



**North Norfolk District Council
Plan Wide
Viability Assessment**

July 2018



Nationwide CIL Service

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Executive Summary

Purpose of the Study

1.1 The purpose of the Plan Wide Viability Study is to appraise the viability of the North Norfolk District Local Plan in terms of the impact of its policies on the economic viability of the development expected to be delivered during the Plan period. The study considers policies that might affect the cost and value of development (e.g. Affordable Housing and Design and Construction Standards). As a secondary outcome the study illustrates the potential to accommodate Community Infrastructure Levy Charges in the event the Council wishes to progress this process. The area covered by the study is the North Norfolk District Council administrative area.

1.2 Section 173 of the National Planning Policy Framework requires that plans should be deliverable ensuring that obligations and policy burdens do not threaten the viability of the developments identified in the plan. An assessment of the costs and values of each category of development is therefore required to consider whether they will yield competitive returns to a willing land owner and willing developer thus enabling the identified development to proceed.

1.3 The study primarily assesses the viability of the proposed policy impacts of the Local Plan. The viability model assesses the value of the relevant category of development (e.g. residential) and all the costs associated with its development as well as the cost of policy impacts like Affordable Housing. The model also makes allowance for returns to both landowner and developer. The outcome of the assessment will be a 'viability margin' expressed as a total sum and as a sum per sq metre. If this figure is positive it demonstrates that the Local Plan and its policies are viable. As a secondary outcome the level of positive viability margin illustrates the potential for additional developer contributions. The level of positive viability expressed on a per sq metre basis therefore informs the potential for contributions via a Community Infrastructure Levy. This information is provided to enable the Council to make informed decisions on the scope for future introduction of the Levy if supported.

Methodology

1.4 The viability assessment comprises a number of key stages as outlined below:

EVIDENCE BASE – LAND & PROPERTY VALUATION STUDY

1.5 Collation of an area-wide evidence base of land and property values for both residential and commercial property

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EVIDENCE BASE – CONSTRUCTION COST STUDY

1.6 Collation of an area-wide evidence base of construction costs for both residential and commercial property

IDENTIFICATION OF SUB-MARKETS

1.7 Sub market identification informed by the valuation evidence gathered at stage one above, Large differences in values across a study area indicate the need to define independent sub areas for viability testing purposes and in turn these will inform the creation of different charging zones for Community Infrastructure Levy Purposes.

POLICY IMPACT ASSESSMENT

1.8 Identification of the policies within the plan, which will have a direct impact on the costs of development and hence the viability of development. Typical policy impacts include affordable housing requirements and sustainable construction requirement.

LAND VALUE BENCHMARKING

1.9 The study generates land value benchmarks to be adopted in the viability assessments that represent a 'competitive return to the landowner' as required by the NPPF. These benchmarks represent a premium over the existing use value of land based on sharing the uplift in value resulting from planning permission between the landowner (as a profit return) and the Local Authority (as a means of funding developer contributions. This is explained in detail in the methodology section.

VIABILITY APPRAISAL

1.10 Viability assessment for both residential and commercial development scenarios based on a series of typologies which reflect the development likely to emerge over the plan period. The assessments are conducted for both greenfield and brownfield development as it is recognised this can result in significant difference in viability.

STAKEHOLDER ENGAGEMENT

1.11 Consultation with local developers/landowners with regard to the appropriateness of assumptions used to conduct the appraisals with regard to prevailing market conditions and any local factors.

1.12 The assessment of viability is an iterative process and therefore a number of stages are revisited when new or updated information is received.

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Key Findings – Residential Viability Assessment

1.14 The North Norfolk District Local Plan sets out the strategy to deliver housing over the plan period. The Plan Wide Viability assessment illustrated that firstly, in general terms, housing development proposed in all locations in the North Norfolk District Local Plan are broadly viable and, secondly, have the potential to accommodate additional contributions (for instance through CIL charges). The assessment of residential land and property values indicated that the Authority did possess significantly different residential sub-markets that warrant differential value assumptions being made in the Whole Plan Viability Assessment and, potentially, a differential rate approach to CIL based on two geographical zones. These are set out in the zone maps at Section 4.

1.15 The viability results are summarised in the table below. The figures represent the margin of viability per sqm taking account of all development values and costs, plan policy impact costs and having made allowance for a competitive return to the landowner and developer. In essence a positive margin confirms whole plan viability and the level of positive margin represents the potential to introduce additional CIL charges.

NCS		SHMA Mix				
		Maximum Potential CIL Rates per Sqm				
Sub-Market/Base Land Value		Edge Principal Town Large	Edge Principal Town Medium	Edge Service Centre	Village Edge	Village Infill
Zone 1 – 25% Affordable						
Greenfield		£103	£123	£124	£130	£124
Brownfield		£37	£56	£56	£63	£57
Zone 2 - 45% Affordable						
Greenfield		£247	£265	£265	£277	£249
Brownfield		£160	£175	£175	£181	£158
NCS		10% LCHO Mix				
		Maximum Potential CIL Rates per Sqm				
Sub-Market/Base Land Value		Edge Principal Town Large	Edge Principal Town Medium	Edge Service Centre	Village Edge	Village Infill
Zone 1 – 25% Affordable						
Greenfield		£123	£144	£145	£150	£147
Brownfield		£58	£76	£77	£83	£80
Zone 2 - 45% Affordable						
Greenfield		£254	£272	£272	£285	£257
Brownfield		£167	£182	£182	£188	£166

Executive Summary

Affordable Housing Rates

1.16 A series of Affordable Housing Tests were undertaken based on different tenure delivery rates and tenure mixes (which are set out in more detail at paras 4.5-4.7) to identify an appropriate approach to Affordable Housing delivery against the emerging policy background in context with current market values and costs. The comparative tables above illustrate the viability of housing development based on 25% Affordable Housing Delivery in Zone 1 and 45% Affordable Housing delivery in Zone 2.

1.17 The first table illustrates results based on the SHMA Tenure Mix (20% Low Cost Home Ownership and 80% Affordable Rent). The second table illustrates the results based on 10% Low Cost Home Ownership overall as indicated by draft NPPF guidance.

1.18 The appraisals do not identify any issues that would prejudice the delivery of the emerging strategy and sites in terms of Affordable Housing delivery or other policy cost impacts. The study supports previous conclusions that inform the councils current approach and that the zones remain robust. All sites remain broadly viable based on the adopted assumptions, emerging policy content and that the study identifies that 45% and 25% are appropriate and viable percentages to inform policy development.

Sheltered & Extra Care Housing

1.19 A separate assessment of C3 Sheltered/C2 Extra Care accommodation for the elderly was undertaken elderly based on 25% Affordable Housing in Zone 1 and 35% Affordable Housing in Zone 2 (SHMA Mix). The results are set out in the table below.

Sub-Market/Base Land Value	Elderly C2/C3 Mixed Housing	Elderly C2/C3 Apartments
Zone 1		
Greenfield	£279	£91
Brownfield	£217	£35
Zone 2		
Greenfield	£322	£132
Brownfield	£249	£58

1.20 The results illustrate that the Council's Affordable Housing targets can be viably delivered by retirement development.

Executive Summary

Allocated Site Viability Appraisal Conclusions

1.21 The viability testing of proposed residential sites in North Norfolk District has been undertaken, accounting for the following policy impacts and key assumptions :-

- Greenfield or Brownfield Development
- Delivery Timescale
- Affordable Housing Delivery of 25-45%
- Key Planning Policy Cost Impacts
- Community Infrastructure Levy
- Residual Planning Obligation Allowances
- Site Specific Abnormal Costs and Mitigation Factors

1.22 The study illustrated that all of the proposed sites are broadly viable based on the adopted assumptions including 25% Affordable Housing in Zone 1 and 45% Affordable Housing in Zone 2 as well as the potential imposition of CIL charges.

1.23 The study is a strategic assessment of whole plan viability and as such is not intended to represent a detailed viability assessment of every individual site. The study applies the general assumptions in terms of affordable housing, planning policy costs impacts and identified site mitigation factors based on generic allowances. It is anticipated that more detailed mitigation cost and viability information may be required at planning application stage to determine the appropriate level of affordable housing and planning obligation contributions where viability issues are raised. The purpose of the study is to determine whether the development strategy proposed by the Plan is deliverable given the policy cost impacts of the Plan.

1.24 In conclusion, the assessment of all proposed residential sites in North Norfolk District has been undertaken with due regard to the requirements of the NPPF and the best practice advice contained in 'Viability Testing Local Plans'. It is considered that all sites are broadly viable across the entire plan period taking account of the Affordable Housing requirements and all policy impacts of the Local Plan as well as the potential introduction of CIL in the future.

1.25 It should be noted that this study should be seen as a strategic overview of plan level viability rather than as any specific interpretation of North Norfolk District Council policy on the viability of any individual site or application of planning policy to affordable housing, CIL or developer contributions.

Executive Summary

CIL Appraisal Conclusions

1.26 The study demonstrates that most of the development proposed by the Local Plan is viable and deliverable taking account of the cost impacts of the policies proposed by the plan and the requirements for viability assessment set out in the NPPF. It is further considered that additional margin exists, beyond a reasonable return to the landowner and developer to accommodate CIL charges in the event that the Council wish to progress a CIL System.

1.27 It is recommended that there are sufficient variations in residential viability to justify a differential zone approach to setting residential CIL rates across the North Norfolk District area.

1.28 Taking account of the viability results, the generic nature of the tests, a reasonable buffer to allow for additional site specific abnormal costs, in the event North Norfolk District Council wish to pursue CIL, we would recommend the following zonal rates. North Norfolk District has a primarily greenfield residential delivery strategy and this has been taken into account in the recommended rates. The proposed residential rates are considered deliverable based on differential affordable housing delivery of 25% in Zone 1 and 45% in Zone 2 (based on either 10% Low Cost Home Ownership or the SHMA Mix). In addition separate rates are recommended for C2/C3 retirement apartments based on differential affordable housing delivery of 25% in Zone 1 and 35% in Zone 2.

Residential CIL		
Zone 1 Housing & C2/C3 Retirement Housing	25% Affordable	£50 sqm
Zone 2 Housing & C2/C3 Retirement Housing	45% Affordable	£100 sqm
Zone 1 C2/C3 Retirement Apartments	25% Affordable	£25 sqm
Zone 2 C2/C3 Retirement Apartments	35% Affordable	£35 sqm

1.29 The initial assessment of commercial land and property values indicated that there were not significant differences in values to justify differential sub-market based assumptions or differential CIL charging zones. It can be seen that food supermarket retail and general retail uses demonstrate positive viability. All of the remaining commercial use class appraisals indicate negative viability.

1.30 The assessment indicates that only food supermarket retail, with CIL potential rate of £326-£375 per square metre, dependent on existing land use and general retail with potential rates of £76-£99 provide a margin to introduce CIL charges. It is therefore recommended on the existing evidence, that all non-retail categories should not be charged CIL. These results are typical of our experience of most Local Authorities' commercial viability assessments. In reality much commercial development is delivered direct by business operators who do not require the 'development profit' element. As such many commercial categories of development are broadly viable and deliverable despite the apparent negativity of the results. In addition, it is common practice in mixed use schemes for the viable residential element of a development to be used to cross subsidise the delivery of the commercial component of a scheme.

Executive Summary

 Maximum Commercial CIL Rates		
Sub Market Area/Charging Zone	General Zone	
	Greenfield	Brownfield
Industrial B1b B1c B2 B8	-£375	-£442
Office B1a	-£808	-£834
Food Retail A1	£375	£326
General Retail A1 A2 A3 A4 A5	£99	£76
Residential Institution C2	-£832	-£851
Hotel C1	-£40	-£69
Community D1	-£2,292	-£2,316
Leisure D2	-£160	-£207
Agricultural	-£673	
Sui Generis - Car Sales	-£527	-£558
Sui Generis - Vehicle Repairs	-£1,188	-£1,230

1.31 It is recommended that a single zone approach is taken to setting commercial CIL rates. The viability assessment results indicate that all non-retail commercial uses should be zero rated.

1.32 The retail viability assessment results indicate that differential rates could be legitimately applied to both types of retail use and, in the case of food supermarket development also to scale of development. Based on the viability assessment results and taking account of a reasonable viability buffer, the following Commercial CIL rates are recommended.

Districtwide	
All Non-residential uses (excepting Retail)	£0sqm
Districtwide	
General Retail A1-A5 (excluding Food Supermarket)	£50sqm
Food Supermarket A1	£100sqm

2 Introduction

2.1 The purpose of the study is to assess the overall viability of the emerging Local Plan and to accompany the publication and consultation of the plan.

2.2 In order to provide a robust assessment, the study first uses generic development typologies to consider the cost and value impacts of the proposed plan policies and determine whether any additional viability margin exists to accommodate a Community Infrastructure Levy. The study then goes on to assess the viability of the key strategic sites which are key to the overall development strategy. The individual site assessments take account of policies in the plan, affordable housing requirements, mandatory requirements to be introduced during the Plan period such as the National Housing Standards and Sustainable Construction requirements including SUDS, the potential Community Infrastructure Levy and site specific constraints to determine whether the proposed sites are viable and deliverable in the plan period.

The NPPF and Relevant Guidance

2.3 The National Planning Policy Framework 2012 introduces a new focus on viability assessment in considering appropriate Development Plan policy. Paras 173-177 provide guidance on 'Ensuring Viability and Deliverability' in plan making. They state :-

“173. Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

174. Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence.....

177. It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand District-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan. Any affordable housing or local standards requirements that may be applied to development should be assessed at the plan-making stage, where possible, and kept under review.”

2 Introduction

2.4 In response to the NPPF, the Local Housing Delivery Group, a cross industry group of residential property stakeholders including the House Builders Federation, Homes and Communities Agency and Local Government Association, has published more specific guidance entitled 'Viability Testing Local Plans' in June 2012.

2.5 The guidance states as an underlying principle, that :-

"An individual development can be said to be viable if, after taking account of all costs, including central and local government policy and regulatory costs and the cost and availability of development finance, the scheme provides a competitive return to the developer to ensure that development takes place and generates a land value sufficient to persuade the land owner to sell the land for the development proposed. If these conditions are not met, a scheme will not be delivered."

2.6 The guidance recommends the following stages be completed in testing Local Plan viability:-

- 1) Review Evidence Base and align existing assessment evidence
- 2) Establish Appraisal Methodology and Assumptions (including threshold land values, site and development typologies, costs of policy requirements and allowance for changes over time)
- 3) Evidence Collation and Viability Modelling (including development costs and revenues, land values, developers profit allowance)
- 4) Viability Testing and Appraisal
- 5) Review of Outputs

2.7 The guidance is not prescriptive about the use of particular financial assessment models but advises that a residual appraisal approach which tests the ability of development to yield a margin beyond all the test factors to determine viability or otherwise is widely used and accepted. The guidance sets out the key elements of viability appraisal and the factors that need to be considered to ensure robust assessment.

2.8 The current study adheres to the principles of the NPPF and 'Viability Testing Local Plans' and sets out its methodology and assumptions in the following sections.

2.9 In March 2018 the Government published consultation drafts of the revised NPPF; new guidance for CIL and S106 Contributions (Supporting Housing Delivery Through Developer Contributions) and new guidance on best practice in viability assessment (Planning Practice Guidance for Viability). The methodology section will comment on compliance with these draft revisions.

3 Methodology

The Process

There are a number of key stages to Viability Assessment which may be set out as follows.

1) Evidence Base – Land & Property Valuation Study

3.1 Establish an area wide evidence base of land and property values for development in each sub-market area. The evidence base relies on the area wide valuation study undertaken by Heb Surveyors in 2018 (Appendix I). The evidence is compiled from current data sources and direct engagement with stakeholders in the local development industry.

2) Evidence Base – Construction Cost Study

3.2 Establish an area wide evidence base of construction costs for each category of development relevant to the local area. The study will also indicate construction rates for professional fees, warranties, statutory fees and construction contingencies. The evidence base relies on the Construction Cost Study by Gleeds undertaken in October 2017 (Appendix 2) In addition specific advice on reasonable allowances for abnormal site constraints was obtained from Gleeds and is outlined in the report.

3) Identification of Sub Market Areas

3.3 The Heb Valuation Evidence considered the existence of potential sub-markets within the study area which might inform the application of differential value assumptions in the Whole Plan testing or inform the creation of differential Charging Zones as part of the progression of a Community Infrastructure Levy.

4) Policy Impact Assessment

3.4 The study will establish the policies proposed by the plan that have a direct impact on the cost of development and apportion appropriate allowances based on advice from cost consultants, Gleeds, to be factored in the viability assessment. Typically cost impacts will include sustainable construction requirements based on National Housing Standards and BREEAM standards.

3 Methodology

5) Viability Appraisal – Whole Plan Assessment & Generic CIL Tests

3.5 The study employs a bespoke model to assess Local Plan viability in accordance with best practice guidance. The initial generic tests will be based on a series of development typologies to reflect the type of development likely to emerge over the plan period. The purpose of these tests is two-fold – it will firstly assess cumulative impact of the policies proposed by the plan to determine whether the overall development strategy is deliverable. Secondly, the model will identify the level of additional margin, beyond a reasonable return for the landowner and developer, which may be available for the introduction of CIL.

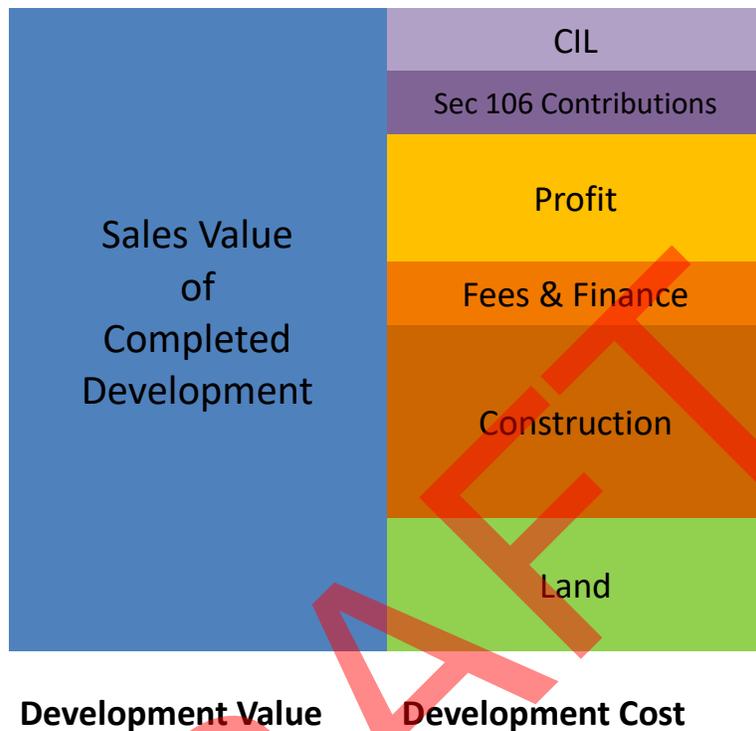
6) Site Specific Appraisal

3.6 The proposed allocated sites undergo very similar appraisal as outlined in the above methodology but site specific factors in terms of site area, housing numbers, housing mix, abnormal cost/mitigation factors are also assessed to ensure sites are deliverable. The tests also enable the draft CIL charges to be applied to determine if they are broadly viable in the context of actual site delivery.

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3 Methodology

The Development Equation



3.7 The appraisal model is illustrated by the above diagram and summarises the 'Development Equation'. On one side of the equation is the development value i.e. the sales value which will be determined by the market at any particular time. The variable element of the value in residential development appraisal will be determined by the proportion and mix of affordable housing applied to the scheme. Appropriate discounts for the relevant type of affordable housing will need to be factored into this part of the appraisal.

3.8 On the other side of the equation, the development cost includes the 'fixed elements' i.e. construction, fees, finance and developers profit. Developers profit is usually fixed as a minimum % return on gross development value generally set by the lending institution at the time. The flexible elements are the cost of land and the amount of developer contribution (CIL and Planning Obligations) sought by the Local Authority.

3.9 Economic viability is assessed using an industry standard Residual Model approach. The model subtracts the Land Value and the Fixed Development Costs from the Development Value to determine the viability or otherwise of the development and any additional margin available for developer contributions.

3 Methodology

Viability Assessment Model

3.10 The NCS model is based on standard development appraisal methodology, comparing development value to development cost. The model factors in a reasonable return for the landowner with the established threshold value, a reasonable profit return to the developer and the assessed cost impacts of proposed planning policies to determine if there is a positive or negative residual output. Provided the margin is positive (ie Zero or above) then the development being assessed is deemed viable. The specific allowances are set out in Section 4. The principles of the model are illustrated below.

Development Value (Based on Floor Area) Eg 10 x 3 Bed 100sqm Houses x £2,200per sqm	£2,200,000
Development Costs	
Land Value	£400,000
Construction Costs	£870,000
Abnormal Construction Costs (Optional)	£100,000
Professional Fees (% Costs)	£90,000
Legal Fees (% Value)	£30,000
Statutory Fees (% Costs)	£30,000
Sales & Marketing Fees (% Value)	£40,000
Contingencies (% Costs)	£50,000
Section 106 Contributions/Policy Impact Cost Assumptions/CIL (Strategic Site Testing Only)	£90,000
Finance Costs (% Costs)	£100,000
Developers Profit (% Return on GDV)	£350,000
Total Costs	£2,175,000
Output	
Viability Margin	£50,000
Potential CIL Rate (CIL Appraisal only)	£50 sqm

3.11 The model will calculate the gross margin available for developer contributions. The maximum rate of CIL that could be levied without rendering the development economically unviable is calculated by dividing the gross margin by the floorspace of the development being assessed.

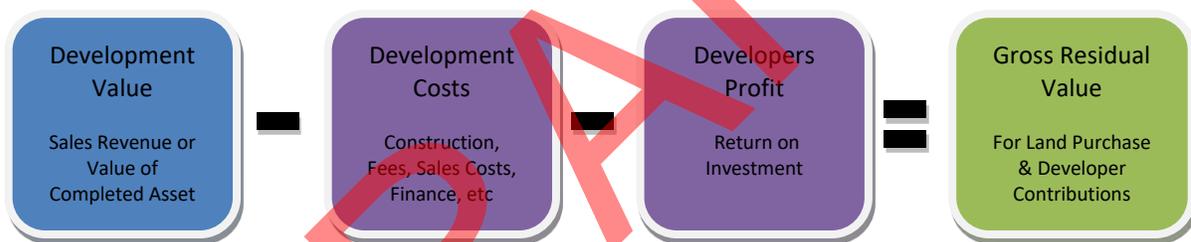
3 Methodology

3.12 It is important to note that the model applies % proportions and further % tenure splits to the housing scenarios to reflect affordable housing discounts which will generate fractional unit numbers. The model automatically rounds to the nearest whole number and therefore some results appear to attribute value proportions to houses which do not register in the appraisal. The fractional distribution of affordable housing discounts is considered to represent the most accurate illustration of the impact of affordable housing policy on viability.

Land Value Assumptions

3.13 It is generally accepted that developer contributions (Affordable Housing, CIL , S106 and S278), will be extracted from the residual land value (i.e. the margin between development value and development cost including a reasonable allowance for developers profit). Within this gross residual value will be a base land value (i.e. the minimum amount a landowner will accept to release a site) and a remaining margin for contributions.

Stage 1 – Residual Valuation



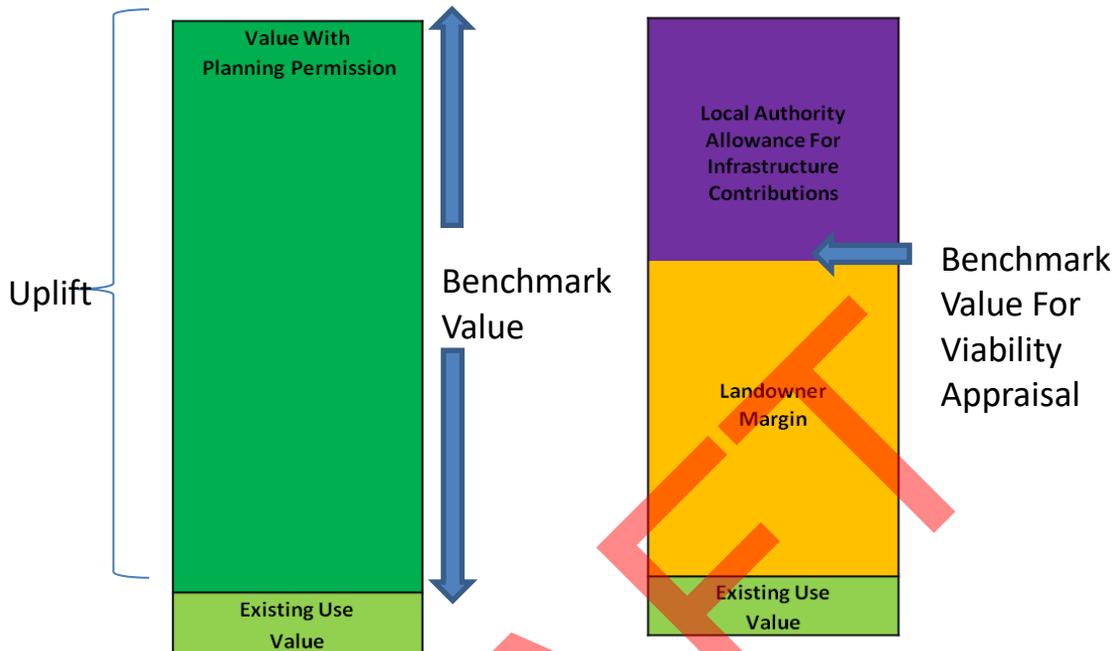
3.14 The approach to assessing the land element of the gross residual value is therefore the key to the robustness of any viability appraisal. There is no single method of establishing threshold land values for the purpose of viability assessment in planning but the NPPF and emerging best practice guidance does provide a clear steer on the appropriate approach.

Stage 2 – Establishing Base Land Value



3 Methodology

Land Value Benchmarking (Threshold Land Values)



3.15 The above diagram illustrates the principles involved in establishing a robust benchmark for land value. Land will have an existing use value (EUV) based on its market value. This is generally established by comparable evidence of the type of land being assessed (e.g. agricultural value for greenfield sites or perhaps industrial value for brownfield sites may be regarded as reasonable existing use value starting points and may be easily established from comparable market evidence).

3.16 The Gross Residual Value of the land for an alternative use (e.g residential use) represents the difference between development value and development cost after a reasonable allowance for development profit, assuming planning permission has been granted. The gross residual value does not make allowance for the impact of development plan policies on development cost and therefore represents the maximum potential value of land that landowners may aspire to.

3.17 In order to establish a benchmark land value for the purpose of viability appraisal, it must be recognised that Local Authorities will have a reasonable expectation that, in granting planning permission, the resultant development will yield contributions towards infrastructure and affordable housing. The cost of these contributions will increase the development cost and therefore reduce the residual value available to pay for the land.

3.18 The appropriate benchmark value will therefore lie somewhere between existing use value and gross residual value based on alternative planning permission. This will of course vary significantly dependent on the category of development being assessed.

3 Methodology

3.19 The key part of this process is establishing the point on this scale that balances a reasonable return to the landowner beyond existing use value and a reasonable margin to allow for infrastructure and affordable housing contributions to the Local Authority.

Benchmarking and Threshold Land Value Guidance

3.20 Benchmarking is an approach which the Homes and Communities Agency refer to in 'Investment and Planning Obligations: Responding to the Downturn'. This guide states: *"a viable development will support a residual land value at a level sufficiently above the site's existing use value (EUUV) or alternative use value (AUV) to support a land acquisition price acceptable to the landowner"*.

3.21 In 2012, The NPPF has introduced a more stringent focus on viability in planning considerations. In particular para 173 states:-

"To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable"

3.22 The NPPF recognises that, in assessing viability, unless a realistic return is allowed to a landowner to incentivise release of land, development sites are not going to be released and growth will be stifled. The most recent practical advice in establishing benchmark thresholds at which landowners will release land was produced by the Local Housing Delivery Group (comprising, inter alia, the Local Government Association, the Homes and Communities Agency and the House Builders Federation) in June 2012 in response to the NPPF. 'Viability Testing Local Plans' states :-

"Another key feature of a model and its assumptions that requires early discussion will be the Threshold Land Value that is used to determine the viability of a type of site. This Threshold Land Value should represent the value at which a typical willing landowner is likely to release land for development, before payment of taxes (such as capital gains tax)".

Different approaches to Threshold Land Value are currently used within models, including consideration of:

- *Current use value with or without a premium.*
- *Apportioned percentages of uplift from current use value to residual value.*
- *Proportion of the development value.*
- *Comparison with other similar sites (market value).*

We recommend that the Threshold Land Value is based on a premium over current use values and credible alternative use values. The precise figure that should be used as an appropriate premium above current use value should be determined locally. But it is important that there is evidence that it represents a sufficient premium to persuade landowners to sell".

3 Methodology

3.23 In March 2018 the Government published draft guidance on best practice in viability assessment (Planning Practice Guidance for Viability). This guidance essentially reflected principles established by the Harman Report and RICS Financial Viability in Planning. With respect to land value benchmarking the draft guidance stated the following :-

“How should land value be defined for the purpose of viability assessment?”

To define land value for any viability assessment, a benchmark land value should be calculated on the basis of the existing use value (EUV) of the land, plus a premium for the landowner. The premium for the landowner should reflect the minimum price at which it is considered a rational landowner would be willing to sell their land. This approach is often called ‘Existing Use Value Plus’ (EUV+).

In order to establish benchmark land value, plan makers, landowners, developers, infrastructure and affordable housing providers should engage with and provide robust and open evidence to inform this process.

In all cases, benchmark land value should:

- *fully reflect the total cost of all relevant policy requirements including planning obligations and, where applicable, any Community Infrastructure Levy charge;*
- *fully reflect the total cost of abnormal costs; site-specific infrastructure costs; and professional site fees;*
- *allow for a premium to landowners (including equity resulting from those building their own homes); and*
- *be informed by comparable market evidence of current uses, costs and values wherever possible. Where recent market transactions are used to inform assessment of benchmark land value there should be evidence that these transactions were based on policy compliant development. This is so that previous prices based on non-policy compliant developments are not used to inflate values over time.*

What is meant by existing use value in viability assessment?

Existing use value (EUV) is the first component of calculating a benchmark land value. EUV is the value of the land in its existing use together with the right to implement any development for which there are extant planning consents, including realistic deemed consents, but without regard to other possible uses that require planning consent, technical consent or unrealistic permitted development. Existing use value is not the price paid and should disregard hope value. Existing use values will vary depending on the type of site and development types.

How should Existing Use Value be established for viability assessment?

Existing use value (EUV) for the purpose of assessing the viability of plans should be determined by plan makers in consultation with developers and landowners.

3 Methodology

When undertaking any viability assessment EUV can be established by assessing the value of the specific site or type of site using published sources of information such as agricultural or industrial land values, or if appropriate capitalised rental levels at an appropriate yield. Sources of data can include (but are not limited to): land registry records of transactions; real estate licensed software packages; real estate market reports; real estate research; estate agent websites; property auction results; valuation office agency; public sector estate/property teams' locally held evidence.

Determining the existing use value of the land should be based on the assumption that no future planning consents will be obtained, but including the value of any consented use.

How should the premium to the landowner be defined for viability assessment?

An appropriate premium to the landowner above existing use value (EUV) should be determined by plan makers in consultation with developers and landowners for the purpose of assessing the viability of plans.

When undertaking any viability assessment, an appropriate minimum premium to the landowner can be established by looking at data from comparable sites of the same site type that have recently been granted planning consent in accordance with relevant policies. The EUV of those comparable sites should then be established.

The price paid for those comparable sites should then be established, having regard to outliers in market transactions, the quality of land, expectations of local landowners and different site scales. This evidence of the price paid on top of existing use value should then be used to inform a judgement on an appropriate minimum premium to the landowner.

Proposed development that accords with all the relevant policies in an up-to-date plan should be assumed to be viable, without need for adjustment to benchmark land values established in the plan making viability assessment. Where a viability assessment does accompany a planning application the price paid for land is not relevant justification for failing to accord with relevant policies in the plan.

NCS Approach to Land Value Benchmarking (Threshold Land Values)

3.24 NCS has given careful consideration to how the Threshold Land Value (i.e. the premium over existing use value) should be established in the light of both the existing and proposed guidance set out above.

3.25 We first adopt an appropriate benchmark for either greenfield or brownfield existing use value dependent on the type of site being assessed. These benchmarks are obtained from comparable market evidence of land sales for the relevant land use in the local area.

3 Methodology

3.26 In determining the appropriate premium to the landowner above existing use value in the 'Existing Use Value Plus' approach, we have concluded that adopting a fixed % over existing value is inappropriate because the premium is tied solely to existing value – which will often be very low - rather than balancing the reasonable return aspirations of the landowner to pursue a return based on alternative use as required by the NPPF. Landowners are generally aware of what their land is worth with the benefit of planning permission. Therefore a fixed % uplift over existing use value will not generally be reflective of market conditions and may not be a realistic method of establishing threshold land value.

3.27 We believe that the uplift in value resulting from planning permission should effectively be shared between the landowner (as a reasonable return to incentivise the release of land) and the Local Authority (as a margin to enable infrastructure and affordable housing contributions). The % share of the uplift will vary dependent on the particular approach of each Authority but based on our experience the landowner will expect a minimum of 50% of the uplift in order for sites to be released. Generally, if a landowner believes the Local Authority is gaining greater benefit than he is unlikely to release the site and will wait for a change in planning policy. We therefore consider that a 50:50 split is a reasonable benchmark and will generate base land values that are fair to both landowners and the Local Authority (this became known as the 'Shinfield Approach' after the methodology adopted by the Inspector to establish benchmark land value in 2013 in an affordable housing appeal – ref. APP/X0360/A/12/2179141)

The Threshold Land Value is established as follows :-

Existing Use Value + % Share Of Uplift from Planning Permission = Threshold Land Value
EUV + Premium to Landowner = Benchmark

3.28 The resultant threshold values are then checked against market comparable evidence of land transactions in the Authority's area by our valuation team to ensure they are realistic. We believe this is a robust approach which is demonstrably fair to landowners. The threshold values are set out in the assumptions section at paras 4.35-4.40.

Worked Example of EUV+ Illustrating Fixed% over Existing Use vs % Share of Uplift

3.29 A landowner owns a 1 Hectare field at the edge of a settlement. The land is proposed to be allocated for residential development. Agricultural value is £20,000 per Ha. The Gross Residual Value of the land with residential planning permission is £1,000,000. Land sales in the area range from £400,000 per Ha to £1 Million per Ha. For the purposes of viability assessment what should this Greenfield site be valued at?

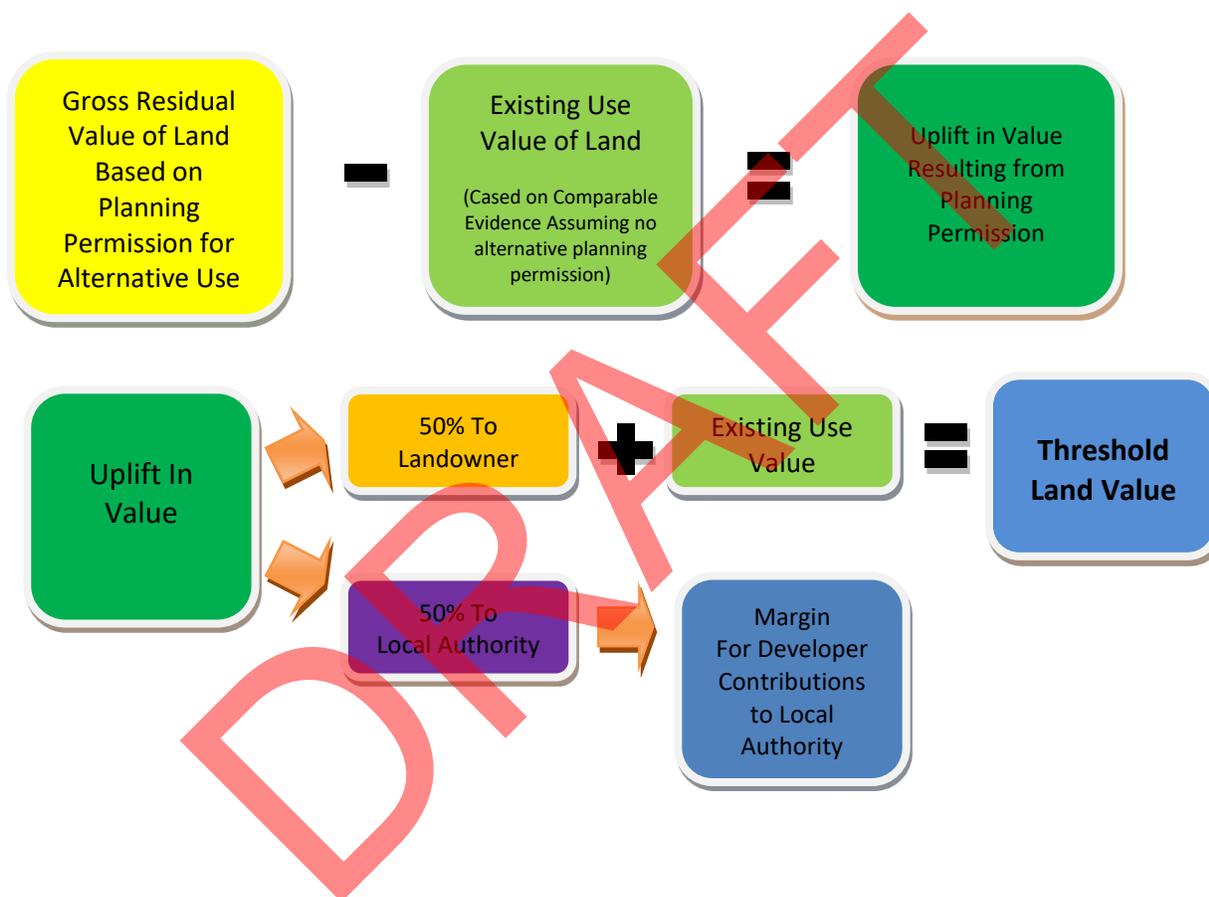
Using a fixed 20% over EUV the land would be valued at £24,000 (£20,000 + 20%)

3 Methodology

Using % Share of Uplift in Value the land would be valued at £510,000 (£20,000 + 50% of the uplift between £20,000 and £1,000,000) – realising a market return for the landowner but reserving a substantial proportion of the uplift for infrastructure contribution.

In our view the % share of uplift method is more realistic to market circumstances than the application of a fixed premium over EUV.

Benchmarking Based on EUV + % Share of Uplift in Land Value



3.30 Whilst comparable evidence of policy compliant local land sales with planning permission is useful as a sense check, in our view it is difficult to find two sites that are directly comparable in view of the various factors that will influence the purchase price of land including precise location, abnormal site development cost, lower build cost rates enjoyed by volume housebuilders and the particular business decision of the purchaser.

3 Methodology

3.31 The alternative method at the other end of the scale, following the part of the guidance which states *'benchmark land value should fully reflect the total cost of all relevant policy requirements including planning obligations and, where applicable, any Community Infrastructure Levy charge'*, would be to calculate the total cost of all policy targets of the LPA first and determine what is left for the landowner and provided this margin offered some level of premium over EUV, accept it as a benchmark. In effect this would guarantee a positive viability result in every instance as no attempt is made to first establish 'the minimum land value at which a landowner would sell.'

3.32 We believe the purpose of viability appraisal and indeed the intention of the guidance is to ensure the total costs of policy compliance still leave enough room for the developer to make a sensible profit and for the landowner to achieve a reasonable return to induce him to sell. Since developer contributions must be extracted from the uplift in land value resulting from planning permission, unless some attempt is made to create a benchmark land value that reflects this 'reasonable return' to the landowner before the total costs of policy targets are subtracted, then the appraisal would serve no purpose. We consider the EUV + % Uplift method represents a balanced approach between the alternatives outlined above that is fair and reasonable and relies more precisely on the specific development cost and value of the site being assessed.

Brownfield and Greenfield Land Value Benchmarks

3.33 In order to represent the likely range of benchmark scenarios that might emerge in the plan period for the appraisal it will be necessary to test alternative threshold land value scenarios. A greenfield scenario will represent the best case for developer contributions as it represents the highest uplift in value resulting from planning permission. The greenfield existing use is based on agricultural value.

3.34 The median brownfield position recognises that existing commercial sites will have an established value. The existing use value is based on a low value brownfield use (industrial). The viability testing firstly assesses the gross residual value (the maximum potential value of land based on total development value less development cost with no allowance for affordable housing, sec 106 contributions or planning policy cost impacts). This is then used to apportion the share of the potential uplift in value to the greenfield and brownfield benchmarks. This is considered to represent a reasonable scope of land value scenarios in that change from a high value use (e.g. retail) to a low value use (e.g. industrial) is unlikely.

3.35 Actual market evidence will not always be available for all categories of development. In these circumstances the valuation team make reasoned assumptions.

Residential

Benchmark 1	Greenfield	Agricultural – Residential (Maximum Contribution Potential)
Benchmark 2	Brownfield	Industrial – Residential

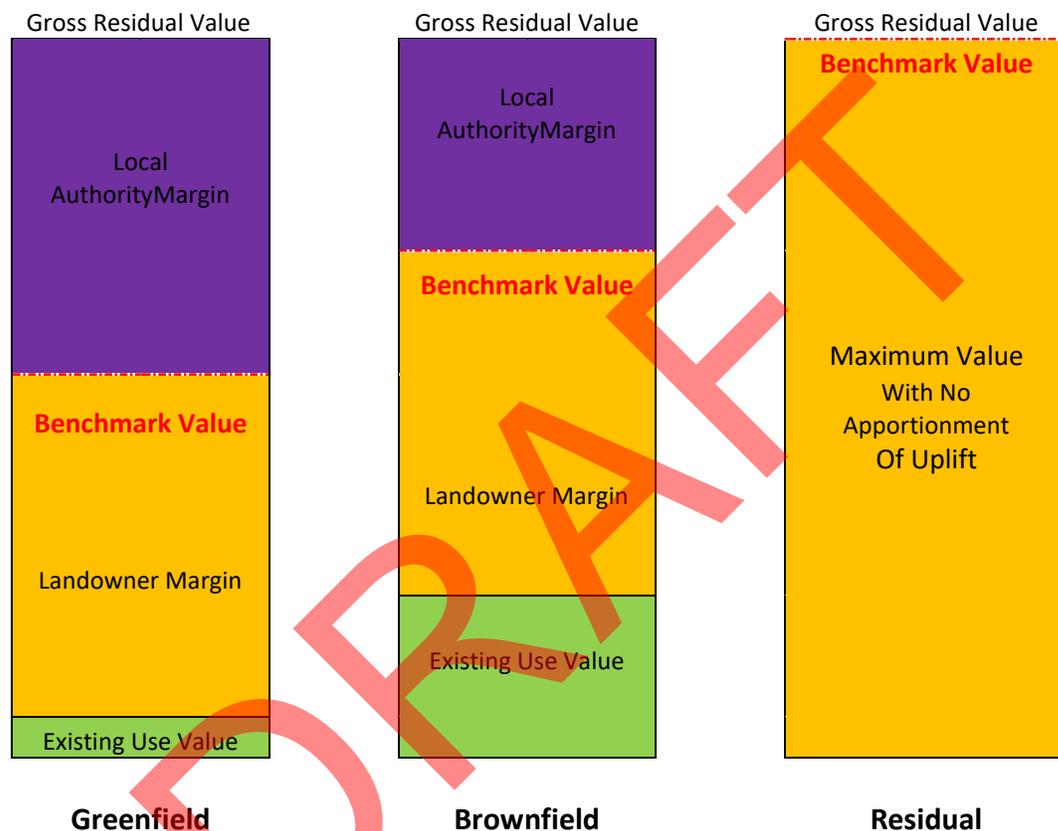
Commercial

3 Methodology

Benchmark 1 Greenfield
 Benchmark 2 Brownfield

Agricultural – Proposed Use (Maximum Contribution Potential)
 Industrial – Proposed Use

3.36 The viability study assumes that affordable housing land has limited value as development costs form a very high proportion of the ultimate discounted sale value of the property.



3.37 The above diagram illustrates the concept of Benchmark Land Value. The level of existing use value for the three benchmarks is illustrated by the green shading. The uplift in value from existing use value to proposed use value is illustrated by the blue and gold shading. The gold shading represents the proportion of the uplift allowed to the landowner for profit. The blue shading represents the allowance of the uplift for developer contributions to the Local Authority. The Residual Value assumes maximum value with planning permission with no allowance for planning policy cost impacts. This benchmark is used solely to generate the brownfield and greenfield threshold values.

4 Appraisal Assumptions

Development Categories

4.1 In order to ensure that the study is sufficiently comprehensive to inform a Differential Rate CIL system, all categories of development in the Use Classes Order will be considered, including a relevant sample of Sui Generis uses to reflect typical developments in the North Norfolk District Local Plan area, as follows :-

Residential (C3) - Based on varying residential development scenarios and factoring in the affordable housing requirements of the Authority. Land values are assessed based on house type plots. Sales values are assessed on per sqm rates.

Commercial - The following categories are considered. Land Values and Gross Development Values are assessed on sqm basis.

Industry (B1(b)B1(c), B2, B8)

Offices (B1a)

Food Supermarket Retail (A1)

General Retail (A1, A2, A3, A4, A5)

Hotels (C1)

Residential Institutions (C2)

Institutional and Community (D1)

Leisure (D2)

Agricultural

Sui Generis - Vehicle Sales

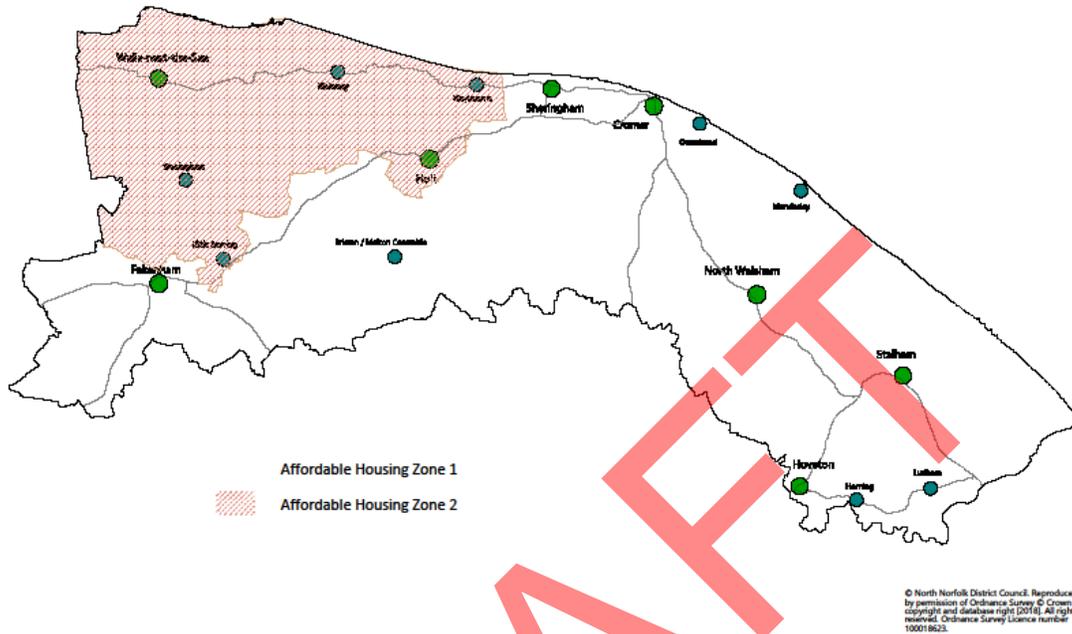
Sui Generis – Car Repairs

Sub Market Areas and Potential Charging Zones

4.2 The Heb valuation study considered evidence of residential land and property values across North Norfolk District and concluded that there were sufficient distinctions between sales prices to warrant differential value assumptions being made in the Whole Plan Viability Assessment and, potentially, a differential rate approach to CIL based on geographical zones.

4.3 The sub-market areas which may also form potential CIL Charging Zones are set out in the residential zone map below. The study acknowledged that the two sub-market areas that support the Council's current affordable housing policy remain robust. There were a few anomalies where high value properties abut low value areas but the zoning is intended to represent an overview of the tone of values in an area rather than a street specific analysis and also acknowledges the values of new development that are likely to emerge.

4 Appraisal Assumptions



Affordable Housing Sub-Market Areas

4.4 The variations in commercial values were not considered significant enough across the District to justify the application of differential assumptions based on sub-market areas or to indicate a differential charging zone approach to CIL.

4 Appraisal Assumptions

Affordable Housing

4.5 A series of residential viability tests have been undertaken, reflecting affordable housing delivery from 20%-45%. The following extract from a generic sample residential viability appraisal model illustrates how affordable housing is factored into the residential valuation assessment. The relevant variables (e.g. unit numbers, types, sizes, affordable proportion, tenure mix etc.) are inputted into the appropriate cells. The model will then calculate the overall value of the development taking account of the relevant affordable unit discounts.

DEVELOPMENT SCENARIO	Mixed Residential Large Scale				Apartments	20
BASE LAND VALUE SCENARIO	Greenfield				2 bed houses	40
DEVELOPMENT LOCATION	Zone 3				3 Bed houses	80
DEVELOPMENT DETAILS	200	Total Units			4 bed houses	40
Affordable Proportion	30%	30	Affordable Units		5 bed house	20
Affordable Mix	42%	Intermediate	19%	Social Rent	39%	Affordable Rent
Development Floorspace	13,706	Sqm Market Housing	4,560	Sqm Affordable Housing		
Development Value						
Market Houses						
14	Apartments	65	sqm	2853	£ per sqm	£2,596,230
28	2 bed houses	75	sqm	3390	£ per sqm	£7,119,000
56	3 Bed houses	90	sqm	3337	£ per sqm	£16,818,480
28	4 bed houses	120	sqm	3122	£ per sqm	£10,489,920
14	5 bed house	164	sqm	2906	£ per sqm	£6,672,176
Intermediate Houses						
		60%	Market Value			
5	Apartments	65	sqm	1718	£ per sqm	£560,786
15	2 Bed house	75	sqm	2034	£ per sqm	£2,306,556
5	3 Bed House	90	sqm	2002	£ per sqm	£908,198
Social Rent Houses						
		40%	Market Value			
2	Apartments	65	sqm	1141.2	£ per sqm	£169,126
7	2 Bed house	75	sqm	1356	£ per sqm	£695,628
2	3 Bed House	90	sqm	1334.8	£ per sqm	£273,901
Affordable Rent Houses						
		50%	Market Value			
5	Apartments	65	sqm	1426.5	£ per sqm	£433,941
14	2 Bed house	75	sqm	1695	£ per sqm	£1,784,835
5	3 Bed House	90	sqm	1668.5	£ per sqm	£702,772
200	Total Units					
Development Value						£51,531,549

It is important to note that the model applies % proportions and further % tenure splits to the housing scenarios which will generate fractional unit numbers. The model automatically rounds to the nearest whole number and therefore some results appear to attribute value proportions to houses which do not register in the appraisal. The fractional distribution of affordable housing discounts is considered to represent the most accurate illustration of the impact of affordable housing policy on viability.

4 Appraisal Assumptions

4.6 The following Affordable Housing Assumptions have been agreed for the purpose of the residential viability appraisals in line with the proposed alternative approaches of the Council. The assumptions relate to the overall proportion of affordable housing, the tenure mix between Low Cost Home Ownership (Shared Ownership and Shared Equity) and Rented Housing (Affordable Rent). Finally the transfer values in terms of % of open market value are set out for each tenure type. The transfer value equates to the assumed price paid by the registered housing provider to the developer and is assessed as a discounted proportion of the open market value of the property in relation to the type (tenure) of affordable housing. The Council are seeking to test the impact of the tenure split required by the SHMA of 20% Low Cost Home Ownership and 80% Rented compared to the potential requirement to provide a minimum of 10% Low Cost Home Ownership (in line with emerging NPPF policy) as part of any overall Affordable Housing delivery.

Affordable Housing	Proportion %	Tenure Mix %		
		Shared Ownership	Shared Equity	Affordable Rent
Affordable Housing SHMA Test 1	20%	12%	8%	80%
Affordable Housing SHMA Test 2	25%	12%	8%	80%
Affordable Housing SHMA Test 3	30%	12%	8%	80%
Affordable Housing SHMA Test 4	45%	12%	8%	80%
Affordable Housing 10% LCHO Test 1	20%	30%	20%	50%
Affordable Housing 10% LCHO Test 2	25%	24%	16%	60%
Affordable Housing 10% LCHO Test 3	30%	20%	13%	67%
Affordable Housing 10% LCHO Test 4	45%	13%	9%	78%
Transfer Values % OMV		60%	70%	50%

4.7 The affordable assumptions were applied to all residential scenario testing. For the smaller unit number tests the proportional and tenure splits result in fractions of unit numbers. In these cases the discounts may be considered to equate to the impact of off-site contributions.

Development Density

4.8 Density is an important factor in determining gross development value and land value. Density assumptions for commercial development will be specific to the development category. For instance the floorplate for industrial development is generally around 50% of the site area to take account of external servicing, storage and parking. Offices will vary significantly dependent on location, town centre offices may take up 100% of the site area whereas out of town locations where car parking is a primary consideration, the floorplate may be only 25% of the site area. Food retailing generally has high car parking requirements and large site areas compared to floorplates.

4 Appraisal Assumptions

The land : floorplate assumptions for commercial development are as follows:-

Industrial	2:1
Offices	2:1
General Retail	1.5:1 (shopping parades, local centres etc.)
Food retail	3:1
Leisure	3:1
Hotels	2:1
Residential Institutions	1.5:1
Community Uses	1.5:1

4.9 Residential densities vary significantly dependent on house type mix and location. Mixed housing developments may vary from 10-50 dwellings per Hectare. Town Centre apartment schemes may reach densities of over 150 units per Hectare. We generate plot values for residential viability assessment related to specific house types. The plot values allow for standard open space requirements per Hectare. The densities adopted in the study reflect the assumptions of the Local Authority on the type of development that is likely to emerge during the plan period.

4.10 The density assumptions for house types related to plot values are as follows :-

Apartment	100 units per Ha
2 Bed House	40 units per Ha
3 Bed House	35 units per Ha
4 Bed House	25 units per Ha
5 Bed House	20 units per Ha

House Types and Mix

4.11 The study uses the following standard house types as the basis for valuation and viability testing as unit types that are compliant with National Housing standards and meet minimum Local Plan policy requirements. The assessment is intended to provide a 'worst case' scenario as marginally larger unit types are unlikely to command higher plot values and so larger unit types will generally demonstrate improved levels of viability.

Apartment	70 sqm
2 Bed House	75 sqm
3 Bed House	90 sqm
4 Bed House	120 sqm
5 Bed House	150 sqm

4.12 Housing values and costs are based on the same gross internal area. However, apartments will contain circulation space (stairwells, lifts, access corridors) which will incur construction cost but which is not directly valued. An additional construction cost allowance is made of 15% to reflect the difference between gross and net floorspace. For C2 Extra Care/C3 Sheltered Accommodation for the elderly an additional allowance of 30% is made for the provision of communal facilities, wardens accommodation etc that is not directly revenue earning.

4 Appraisal Assumptions

Residential Development Scenarios

4.13 The study tests a series of residential development scenarios to reflect general types of development that are likely to emerge over the plan period.

4.14 For residential development, five scenarios were considered. The list does not attempt to cover every possible development in the District but provides an overview of residential development in the plan period.

1. Edge Principal Town Large Scale (Apts, 2, 3, 4 & 5 Bed Housing)	200 Units
2. Edge Principal Town Medium Scale (2, 3 & 4 Bed Housing)	100 Units
3. Edge Service Centre (2, 3 & 4 Bed Housing)	30 Units
4. Village Edge (2, 3 & 4 Bed Housing)	15 Units
5. Village Infill (2 & 3 Bed Housing)	9 Units
1. Elderly Mixed Housing (Apartments & 2 Bed Houses)	40 Units
2. Elderly Apartments	40 Units

Commercial Development Scenarios

4.15 The viability appraisal tests all forms of commercial development broken down into use class order categories. For completeness the appraisal includes a sample of sui generis uses. A typical form of development that might emerge during the plan period, is tested within each use class.

4.16 The density assumptions for commercial development will be specific to the development category. For instance the floorplate for industrial development is generally around 50% of the site area to take account of external servicing, storage and parking. Offices will vary significantly dependent on location, town centre offices may take up 100% of the site area whereas out of town locations where car parking is a primary consideration, the floorplate may be only 25% of the site area. Food retailing generally has high car parking requirements and large site areas compared to floorplates.

4.17 The viability model also makes allowance for net:gross floorspace. In many forms of commercial development such as industrial and retail, generally the entire internal floorspace is deemed lettable and therefore values per sqm and construction costs per sqm apply to the same area. However in some commercial categories (e.g. offices) some spaces are not considered lettable (corridors, stairwells, lifts etc.) and therefore the values and costs must be applied differentially. The net:gross floorspace ratio enables this adjustment to be taken into account.

4 Appraisal Assumptions

4.18 The table below illustrates the commercial category and development sample testing as well as the density assumptions and net:gross floorspace ratio for each category. In acknowledgement of consultation responses to initial retail viability work more detailed assessment of retail viability has been undertaken in respect to use and scale of development to reflect the type of general retail (A1-A5) and food supermarket (A1) development considered likely to emerge over the plan period.

Commercial Development Sample Typology					
Unit Size & Land Plot Ratio					
		Unit Size Sqm	Plot Ratio		Sample
			%	Gross:Net	
Industrial	B1b B1c B2 B8	1000	200%	1.0	Factory Unit
Office	B1a	1000	200%	1.2	Office Building
Food Retail	A1	3000	300%	1.0	Supermarket
General Retail	A 1 – A5	300	150%	1.0	Roadside Type Shop Unit
Residential Inst	C2	4000	150%	1.2	Care Facility
Hotels	C3	3000	200%	1.2	Mid Range Hotel
Community	D1	200	150%	1.0	Community Centre
Leisure	D2	2500	300%	1.0	Bowling Alley
Agricultural		500	200%	1.0	Farm Store
Sui Generis	Car Sales	1000	200%	1.0	Car Showroom
Sui Generis	VehicleRepairs	300	200%	1.0	Repair Garage

Sustainable Construction Standards

4.19 The former Code for Sustainable Homes standards have been replaced by changes to the Building Regulations based on the National Housing Standards. It is considered that Building Regulation changes do not impose standards beyond an equivalent of the former CoSH 4 and the cost rates adopted in the study reflect this. The Commercial Viability assessments are based on BREEAM 'Excellent' construction rates.

Construction Costs

4.20 The construction rates will reflect allowances for external works, drainage, servicing preliminaries and contractor's overhead and profit. The viability assessment includes a 5% allowance for construction contingencies.

4 Appraisal Assumptions

4.21 The following residential construction rates are adopted in the study to reflect National Housing Standards, Category 2 Dwellings, average house sizes built on typical development sites and the water standards of North Norfolk District Council. Whilst the Code for Sustainable Homes standards have been withdrawn, the cost parameters that inform them remain a useful guide to the cost implications of the National Housing standards and are considered within the study. The cost rates include an upward adjustment for the adaptable and accessible dwelling standards proposed by the Council. The construction cost rates are set out at Page 6 of the Gleeds Cost report at Appendix 2.

Residential Construction Cost Sqm		
Apartments	1472	sqm
2 bed houses	1003	sqm
3 Bed houses	1003	sqm
4 bed houses	1003	sqm
5 bed house	1003	sqm
Extra Care Apts	1424	sqm
Sheltered Housing	1210	sqm

Commercial Construction Cost Sqm	
747	Factory Unit
1551	Office Building
1116	Supermarket
981	Roadside Retail Unit
1351	Care Facility
1524	Mid Range Hotel
2633	Community Centre
1059	Bowling Alley
793	Farm Store
1541	Car Showroom
1477	Repair Garage

Abnormal Construction Costs

4.22 Most development will involve some degree of exceptional or 'abnormal' construction cost. Brownfield development may have a range of issues to deal with to bring a site into a 'developable' state such as demolition, contamination, utilities diversion etc. Whole Plan and CIL Viability Assessment is based on generic tests and it would be unrealistic to make assumptions over average abnormal costs to cover such a wide range of scenarios. In reality abnormal cost issues like site contamination are reflected in reductions to land values so making additional generic abnormal cost assumptions would effectively be double counting costs unless the land value allowances were adjusted accordingly.

4.23 It is considered better to bear the unknown costs of development in mind when setting CIL rates and not fix rates at the absolute margin of viability. Nevertheless, for the assessment of strategic or allocated sites, where there is specific evidence of abnormal site constraint costs, these will be factored into the site specific appraisals. The abnormal assumptions are set out in the Strategic Site Appraisal section.

4 Appraisal Assumptions

Policy Cost Impacts & Planning Obligation Contributions

4.24 The study seeks to review Whole Plan Viability and therefore firstly assesses the potential cost impacts of the proposed policies in the plan to determine appropriate cost assumptions in the viability assessments and broadly determine if planned development is viable.

4.25 CIL may replace some if not all planning obligation contributions. The second purpose of the study is to test the maximum margin available for CIL that is available from various types of development. CIL, if adopted, will represent the first 'slice' of tax on development. Planning Obligations may be used to top up contributions on a site specific basis subject to viability appraisal at planning application stage.

4.26 Nevertheless the CIL Guidance 2014 (contained in the National Planning Practice Guidance) indicates that Authorities should demonstrate that the development plan is deliverable by funding infrastructure through a mixture of CIL and planning obligation contributions in the event that the Authority does not intend to completely replace planning obligations with CIL.

4.27 Costs have been factored into the viability appraisals to reflect the impact of relevant development plan policy and the residual use of planning obligations for site specific mitigation. Based on historic evidence of planning obligation contributions over the last five years (excluding Affordable Housing which is factored in separately) the following cost allowances have been adopted in the study:-

Residual Planning Obligations for site specific mitigation

**£3000 per dwelling
£10 per sqm commercial**

4.28 Historical evidence demonstrates that where residential planning obligations have been charged these amount to an average of £3078 per dwelling. Since it is anticipated that CIL will replace the funding of some types of infrastructure previously covered by planning obligations the adopted allowance of £3000 per dwelling is considered to be fully robust. An estimate of £10 per sqm has been made for commercial development.

4.29 Costs have been factored into the viability appraisals to reflect the impact of relevant development plan policies and the residual use of planning obligations for site specific mitigation. The cost impact of these mitigation measures has been assessed by Gleeds and may be summarised as follows :-

ACCESSIBILITY STANDARDS - Houses Cat 2 £10sqm x 100% Apartments Cat 2 £15sqm x 100%

The appraisals test the impact of requiring 100% of homes to be built to Category 2 standard for accessibility. For the majority of housing development this is estimated to add £10sqm over National Housing Standards equivalent build cost allowance for houses and £15 sqm for apartments.

4 Appraisal Assumptions

WATER CONSERVATION STANDARDS

The higher optional water standard of 110 lpd is considered to be covered by the adopted construction cost rates (equivalent of CoSH Code 4) and do not require any additional allowance.

ENERGY

No additional allowance has been made for Zero Carbon costs in view of the Government's policy change on this issue.

BREAAM Standards

The construction costs for commercial development make allowance for BREAAM 'Excellent' rating including additional professional fees.

SPACE STANDARDS

The residential unit sizes adopted in the appraisals comply with National Space Standards.

Developers Profit

4.30 Developer's profit is generally fixed as a % return on gross development value or return on the cost of development to reflect the developer's risk. In current market conditions, and based on the assumed lending conditions of the financial institutions, a 20% return on GDV is used in the residential viability appraisals to reflect speculative risk on the market housing units. This is in line with the draft guidance on viability assessment introduced by the Government in March 2018. However it must be acknowledged that affordable housing does not carry the same speculative risk as it effectively pre-sold. There is significant evidence of this 'split profit' approach being accepted as a legitimate approach in Whole Plan Viability and Community Infrastructure Levy Examinations and Affordable Housing Sec 106 BC Appeals.

4.31 In line with the draft guidance on viability assessment introduced by the Government in March 2018 the profit allowance on the affordable housing element has been set at 6%. It should also be recognised that a 'competitive profit' will vary in relation to prevailing economic conditions and will generally reduce as conditions improve, generally remaining within a 15-20% range for speculative property.

4.32 In the generic commercial development assessments, a 17.5% profit return is applied in recognition that most development will be pre-let or pre-sold with a reduced level of risk. If it is considered that industrial and other forms of commercial are likely to be operator rather than developer led, this allowance may be further reduced to a 5-10% allowance to reflect an allowance for operational/opportunity cost rather than a traditional development risk.

4 Appraisal Assumptions

Property Sales Values

4.33 The sale value of the development category will be determined by the market at any particular time and will be influenced by a variety of locational, supply and demand factors as well as the availability of finance. The study uses up to date comparable evidence to give an accurate representation of market circumstances.

4.34 A valuation study of all categories of residential and commercial property has been undertaken by HEB Chartered Surveyors in 2018. A copy of the report is attached at Appendix I.

Residential Sales Values						
Charging Zone	Sales Value £sqm					
	Apartment	2 Bed	3 Bed	4 Bed	5 Bed	Retirement
Zone 1	2400	2500	2400	2400	2300	3600
Zone 2	2900	3300	3200	3200	3100	3900

Commercial Sales Values Sqm		
Charging Zones		
Area Wide		
Industrial		650
Office		1600
Food Retail	A1	2750
General Retail	A1-A5	1750
Residential Inst		1200
Hotels		2750
Community		1077
Leisure		1450
Agricultural		350
Sui Generis	Car Sales	1600
Sui Generis	Vehicle Repairs	700

Land Value Allowances - Residential

4.35 Following the land value benchmarking 'uplift split' methodology set out in Section 3 the following greenfield and brownfield existing residential land use value assumptions are applied to the study. The gross residual value (the maximum potential value of land assuming planning permission but with no planning policy, affordable housing sec 106 or CIL cost impacts). An example for Village Edge land in the High Value zone is illustrated in the table below.

4 Appraisal Assumptions

Land Value	£20000	Existing Greenfield (agricultural) Per Ha Brownfield (equivalent general commercial) Per Ha Gross Residual Residential Value per Ha	Uplift	50%
	£308,000			
	£3,976,521			

4.36 50% of the uplift in value between existing use and the gross residual value of alternative use with planning permission is applied to generate benchmarked land values per Ha. These land values are then divided by the assumed unit type densities to generate the individual greenfield and brownfield plot values to be applied to the appraisals.

EUV	+	50% of Uplift in Value	=	Threshold Land Value
Greenfield	£20,000	+	50% (3,976,521 - £20,000)	= £1,998,261 per Ha
Brownfield	£308,000	+	50% (£3,976,521 - £308,000)	= £2,142,261 per Ha

Density Assumptions	Apt	2 Bed	3 Bed	4 Bed	5 Bed
	100	40	35	25	20
LAND VALUES (Plot Values)					
	Apt	2 Bed	3 Bed	4 Bed	5 Bed
Greenfield	£19983	£49957	£57093	£79930	£99913
Brownfield	£21423	£53557	£61207	£85690	£107113

4.37 The complete set of gross residual residential values for all the residential tests from which the benchmarked threshold land value allowances were derived, is set out in the table below.

Gross Residual Land Value per Ha	Zone 1	Zone 2
Edge Principal Town Large Scale	£1929754	£3862473
Edge Principal Town Medium Scale	£2077008	£3988231
Edge Service Centre	£2084301	£3986664
Village Edge	£2072139	£3976521
Village Infill	£2109371	£4031034

Land Value Allowances - Commercial

4.38 The approach to commercial land value allowances is the same in principle. Obviously there will be a broad spectrum of residual land values dependent on the commercial use. A number of residual land calculations for commercial categories actually demonstrate negative values – which is clearly unrealistic for the purpose of viability appraisal. Therefore where residual values are less

4 Appraisal Assumptions

than market comparable evidence the market comparable is used as the minimum gross residual figure. In the North Norfolk District assessments only retail gross residual values exceeded these market comparable benchmarks.

4.39 The following provides an example threshold land value allowances food supermarket retail

	EUV	+	50% of Uplift in Value	=	Threshold Land Value
Greenfield	£20,000	+	50% (£2,985,965 - £20,000)	=	£1,502,983 per Ha
Brownfield	£308,000	+	50% (£2,985,965 - £308,000)	=	£1,646,983 per Ha

4.40 The greenfield and brownfield land value threshold allowances are all set out within the commercial viability appraisals but in summary the gross residual values on which they are based may be summarised as follows :-

Commercial Residual Land Values	Area Wide
Industrial Land Values per Ha	
Residual Land Value per Ha	£308000
Office Land Values per Ha	
Residual Land Value per Ha	£308000
Food Retail Land Values per Ha	
Residual Land Value per Ha < 3000sqm	£2985965
General Retail Land Values per Ha	
Residual Land Value per Ha	£1649149
Residential Institution Land Values per Ha	
Residual Land Value per Ha	£308000
Hotel Land Values per Ha	
Residual Land Value per Ha	£7500000
Community Use Land Values per Ha	
Residual Land Value per Ha	£308000
Leisure Land Values per Ha	
Residual Land Value per Ha	£350000
Agricultural Land Values per Ha	
Comparable Land Value per Ha	£20000

4 Appraisal Assumptions

Fees, Finance and Other Cost Allowances

4.41 The following 'industry standard' fee and cost allowances are applied to the appraisals.

Residential Development Cost Assumptions			
Professional Fees		8.0%	Construction Cost
Legal Fees		0.5%	GDV
Statutory Fees		1.1%	Construction Cost
Sales/Marketing Costs		2.0%	Market Units Value
Contingencies		5.0%	Construction Cost
Planning Obligations		3000	£ per Dwelling
		10	£ per sqm Commercial
Interest	5.0%	12	Month Construction
Arrangement Fee	1.0%	Cost	3-6 Mth Sales Void

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5 Viability Appraisal Results

5.1 The results of the residential typology Viability Testing are set out in the tables below. In order to inform the policy position of the Council the residential viability tests were undertaken on the assumption that schemes would deliver between 20 - 45% Affordable Housing, dependent on location, and the Council's adopted tenure mix.

5.2 Any positive figures confirm that the category of development tested is economically viable in the context of Whole Plan viability and the impact of planning policies. The level of positive viability indicates the potential additional margin for developer contributions on a per sq metre basis (which could inform CIL rates).

5.3 Each category of development produces a greenfield and brownfield result in each test area. These results reflect the benchmark land value scenario. The first result assumes greenfield development which generally represents the highest uplift in value from current use and therefore will produce the highest potential CIL Rate. The second result assumes that development will emerge from low value brownfield land.

5.4 It should be recognised that the CIL Rates that have emerged from the study are maximum potential rates, based on optimum development conditions. The viability tests are necessarily generic and do not factor in site specific abnormal costs that may be encountered on many development sites. The tests produce maximum contributions for infrastructure and therefore ultimate CIL charges should consider an appropriate 'viability buffer' to account for additional unforeseen costs and site specific abnormals.

Residential Accommodation

SHMA MIX (12% Shared Ownership, 8% Shared Ownership, 80% Affordable Rent)

Test 1 – 20% Affordable Housing

NCS		Maximum Potential CIL Rates per Sqm			
Sub-Market/Base Land Value	Edge Principal Town Large Scale	Edge Principal Town Medium Scale	Edge Service Centre	Village Edge	Village Infill
Zone 1					
Greenfield	£133	£156	£157	£162	£160
Brownfield	£71	£92	£93	£99	£97
Zone 2					
Greenfield	£412	£444	£446	£446	£445
Brownfield	£351	£380	£381	£382	£381

5 Viability Appraisal Results

SHMA MIX (12% Shared Ownership, 8% Shared Ownership, 80% Affordable Rent)
Test 2 – 25% Affordable Housing

		Maximum Potential CIL Rates per Sqm				
Sub-Market/Base Land Value	Edge Principal Town Large	Edge Principal Town Medium	Edge Service Centre	Village Edge	Village Infill	
Zone 1						
Greenfield	£103	£123	£124	£130	£124	
Brownfield	£37	£56	£56	£63	£57	
Zone 2						
Greenfield	£388	£418	£419	£421	£416	
Brownfield	£323	£350	£351	£353	£348	

SHMA MIX (12% Shared Ownership, 8% Shared Ownership, 80% Affordable Rent)
Test 3 – 30% Affordable Housing

		Maximum Potential CIL Rates per Sqm				
Sub-Market/Base Land Value	Edge Principal Town Large	Edge Principal Town Medium	Edge Service Centre	Village Edge	Village Infill	
Zone 1						
Greenfield	£68	£86	£86	£93	£84	
Brownfield	-£2	£14	£14	£22	£12	
Zone 2						
Greenfield	£360	£388	£389	£391	£383	
Brownfield	£291	£316	£316	£319	£311	

SHMA MIX (12% Shared Ownership, 8% Shared Ownership, 80% Affordable Rent)
Test 4 – 45% Affordable Housing

		Maximum Potential CIL Rates per Sqm				
Sub-Market/Base Land Value	Edge Principal Town Large	Edge Principal Town Medium	Edge Service Centre	Village Edge	Village Infill	
Zone 1						
Greenfield	-£73	-£67	-£69	-£58	-£82	
Brownfield	-£160	-£157	-£159	-£146	-£172	
Zone 2						
Greenfield	£247	£265	£265	£277	£249	

5 Viability Appraisal Results

Brownfield	£160	£175	£175	£181	£158
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10% LCHO MIX (30% Shared Ownership, 20% Shared Ownership, 50% Affordable Rent)

Test 1 – 20% Affordable Housing

		Maximum Potential CIL Rates per Sqm				
Sub-Market/Base Land Value	Edge Principal Town Large	Edge Principal Town Medium	Edge Service Centre	Village Edge	Village Infill	
Zone 1						
Greenfield	£156	£179	£180	£185	£185	
Brownfield	£94	£115	£116	£122	£122	
Zone 2						
Greenfield	£442	£475	£477	£477	£478	
Brownfield	£381	£411	£412	£413	£414	

10% LCHO MIX (24% Shared Ownership, 16% Shared Ownership, 60% Affordable Rent)

Test 2 – 25% Affordable Housing

		Maximum Potential CIL Rates per Sqm				
Sub-Market/Base Land Value	Edge Principal Town Large	Edge Principal Town Medium	Edge Service Centre	Village Edge	Village Infill	
Zone 1						
Greenfield	£123	£144	£145	£150	£147	
Brownfield	£58	£76	£77	£83	£80	
Zone 2						
Greenfield	£415	£445	£447	£448	£445	
Brownfield	£349	£377	£379	£380	£377	

10% LCHO MIX (20% Shared Ownership, 13% Shared Ownership, 67% Affordable Rent)

Test 3 – 30% Affordable Housing

		Maximum Potential CIL Rates per Sqm				
Sub-Market/Base Land Value	Edge Principal Town Large	Edge Principal Town Medium	Edge Service Centre	Village Edge	Village Infill	
Zone 1						
Greenfield	£85	£103	£103	£110	£85	
Brownfield	£15	£31	£31	£38	£15	
Zone 2						
Greenfield	£382	£410	£412	£413	£382	

5 Viability Appraisal Results

Brownfield	£313	£338	£339	£342	£313
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**10% LCHO MIX (13% Shared Ownership, 9% Shared Ownership, 78% Affordable Rent)
Test 4 – 45% Affordable Housing**

		Maximum Potential CIL Rates per Sqm			
Sub-Market/Base Land Value	Edge Principal Town Large	Edge Principal Town Medium	Edge Service Centre	Village Edge	Village Infill
Zone 1					
Greenfield	-£68	-£62	-£63	-£52	-£76
Brownfield	-£155	-£151	-£153	-£141	-£166
Zone 2					
Greenfield	£254	£272	£272	£285	£257
Brownfield	£167	£182	£182	£188	£166

5.5 The results of the residential viability testing demonstrate that the majority of housing development is viable and deliverable in North Norfolk based on the Council's adopted approach to Affordable Housing delivery and other policy cost impacts of the Development Plan.

5.6 Based on the SHMA MIX (12% Shared Ownership, 8% Shared Ownership, 80% Affordable Rent), the viability of brownfield development in the lower value Zone 1 sub-market area starts to become marginal at 30% Affordable Housing. The 10% Low Cost Home Ownership mix improves viability with Zone 1 brownfield development being able to sustain 30% Affordable Housing. Greenfield development in Zone 1 can sustain 30%+ Affordable Housing based on either tenure mix. 25% delivery remains broadly viable across the zone.

5.7 In the higher value Zone 2 sub-market area, residential development can sustain 45% Affordable Housing based on either tenure mix with additional margin for CIL.

Elderly Accommodation

Sub-Market/Base Land Value	Elderly C2/C3 Mixed Housing	Elderly C2/C3 Apartments
Zone 1		
Greenfield	£279	£91
Brownfield	£217	£35
Zone 2		
Greenfield	£322	£132
Brownfield	£249	£58

5.8 The above table illustrates the viability of C2/C3 accommodation for the elderly based on 25% Affordable Housing in Zone 1 and 35% Affordable Housing in Zone 2 (SHMA Mix).

5 Viability Appraisal Results

Commercial Development

Sub Market Area/Charging Zone	Maximum Commercial CIL Rates	
	General Zone	
	Greenfield	Brownfield
Industrial B1b B1c B2 B8	-£375	-£442
Office B1a	-£808	-£834
Food Retail A1	£375	£326
General Retail A1 A2 A3 A4 A5	£99	£76
Residential Institution C2	-£832	-£851
Hotel C1	-£40	-£69
Community D1	-£2,292	-£2,316
Leisure D2	-£160	-£207
Agricultural	-£673	
Sui Generis - Car Sales	-£527	-£558
Sui Generis - Vehicle Repairs	-£1,188	-£1,230

5.9 Most of the above commercial use class appraisals indicated negative viability and therefore no margin to introduce CIL charges. Only food supermarket and general retail demonstrated significant positive viability. These results are typical of our experience of most Local Authorities' commercial viability assessments. In order for viability assessment to be consistent between residential and commercial development, full development profit allowances are contained within all appraisals (assuming all development is delivered by third party developers requiring a full risk return).

5.10 In reality much commercial development is delivered direct by business operators who do not require the 'development profit' element. As such many commercial categories of development are broadly viable and deliverable despite the apparent negativity of the results. In addition, it is common practice in mixed use schemes for the viable residential element of a development to be used to cross subsidise the delivery of the commercial component of a scheme.

6 Site Viability Appraisals

6.1 The study has undertaken specific Viability Appraisals of the residential sites proposed to be allocated by the Local Plan. In addition to the assumptions outlined above additional abnormal site constraint costs associated with the development of the individual sites have been applied to the individual site tests. Advice on cost allowances for these constraints was obtained from Gleeds and is summarised in the table below.

Abnormal Site Development Costs	Budget Cost £/Hectare
<p>Archaeology</p> <p>Typically, Archaeology is addressed by a recording/monitoring brief by a specialist, to satisfy planning conditions Intrusive archaeological investigations are exceptional and not allowed for in the Budget cost</p>	£11,000
<p>Flood Defence Works</p> <p>Generally involves raising floor levels above flood level, on relevant sites Budget £2,000 per unit x 35 units/Hect, apply to 1 in 3 sites</p>	£28,000
<p>Site Specific Access Works</p> <p>New road junction and S278 works, allowance for cycle path linking Major off-site highway works not allowed for.</p>	£22,000
<p>Land Contamination</p> <p>Heavily Contaminated land is not considered, as remediation costs will be reflected in the land sales values Allow for remediation/removal from site of isolated areas of spoil with elevated levels of contamination</p>	£28,000
<p>Ground Stability</p> <p>Former Mining area. Allow raft foundations to dwellings, on 75% of sites Budget £2000 per unit x 35 units x 25% of sites</p>	£20,000
<p>Utilities</p> <p>Allowance for Infrastructure Upgrade</p>	£90,000
<p>Site Specific Biodiversity Mitigation/Ecology</p> <p>Allow for LVIA and Ecology surveys and mitigation and enhancement allowance.</p>	£22,000

6 Site Viability Appraisals

6.2 Draft CIL charges are applied to the allocated site tests as well as the standard cost and value outlined in Section 4. The overall assumptions applied to the allocated site tests may be summarised as follows.

ALLOCATED SITE APPRAISAL GENERAL ASSUMPTIONS							
Affordable Housing							
Affordable Proportion%	25% or 45%						
Affordable Mix	12%	Shared Ownership	8%	Shared Equity	80%	Affordable Rent	
Transfer Value (% OMV)	60%	Shared Ownership	70%	Shared Equity	50%	Affordable Rent	
NB – Not Applied to Student Housing							
Professional Fees @			8.0%	Construction Cost			
Legal Fees			0.5%	GDV			
Statutory Fees			1.1%	Construction Cost			
Sales/Marketing Costs			2.0%	Market Units Value			
Contingencies			5.0%	Construction Cost			
Interest @	5.0%	12	Month Construction		6	Mth Sales Void	
Arrangement Fee	1.0%	Cost					
Development Profit	Market Hsg	20.0%	of GDV	Afford Hsg	6%	of GDV	
CONSTRUCTION COSTS							
	Apt	2 Bed	3 Bed	4 Bed	5 Bed		
Sqm	1644	1120	1120	1120	1120		
Abnormal Costs							
Archlogy (Ha)	Flood (Ha)	Access (Ha)	Contam (Ha)	Sec 106 & Policy Costs(unit)	Ground Stability (Ha)	Utilities Upgrade (Ha)	
11000	28000	22000	28000	3000	20000	90000	

6 Site Viability Appraisals

6.3 The Sales, Land Value and draft CIL Rate assumptions varied dependent on sub market area as follows :-

ZONE 1

LAND VALUES (Plot Values)					
	2B Apt	2 Bed	3 Bed	4 Bed	5 Bed
Greenfield	9749	24372	27854	38995	48744
Brownfield	11189	27972	31968	44755	55944

SALES VALUES					
	2B Apt	2 Bed	3 Bed	4 Bed	5 Bed
Sqm	2400	2500	2400	2400	2300

COMMUNITY INFRASTRUCTURE LEVY	50	£ Per Sqm
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ZONE 2

LAND VALUES (Plot Values)					
	2B Apt	2 Bed	3 Bed	4 Bed	5 Bed
Greenfield	19412	48531	55464	77649	97062
Brownfield	20852	52131	59578	83409	104262

SALES VALUES					
	2B Apt	2 Bed	3 Bed	4 Bed	5 Bed
Sqm	2900	3300	3200	3200	3100

COMMUNITY INFRASTRUCTURE LEVY	100	£ Per Sqm
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HOUSING MIX

Market Housing Mix					
	Apt	2 Bed	3 Bed	4 Bed	5 Bed
% Mix	10%	20%	50%	15%	5%

Affordable Housing Mix			
	Apt	2 Bed	3 Bed
% Mix	20%	30%	50%

6 Site Viability Appraisals

6.5 The site specific testing indicates whether individual development sites are considered viable on a 'traffic light' red, green, amber approach (having applied draft CIL rates as well as all of the policy cost impacts outlined in Section 4).

Green – Site considered broadly viable having made allowance for all reasonable development impacts, a standard developers profit and return to the landowner.

Amber – Site considered capable of viable development making allowance for all reasonable development impacts, a standard developers profit but acknowledging that landowners may need to accept land value reductions for abnormal site development costs if development is to proceed.

Red – Site not currently considered viable based on implementation of Council policies and standard returns to landowners. It should be recognised that sites in this category may be viable if (a) the abnormal costs of bringing the site into a developable state (including some up front infrastructure investment) are deducted from the land value, (b) the Council is minded to relax affordable housing or infrastructure contributions or (c) landowner/developers accept some reduced profit return to stimulate the development.

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6 Site Viability Appraisals

MIXED HOUSING – ZONE 1 – 25% Affordable Housing

Mixed Housing Viability Results		Zone 1		0-5 Year Delivery	
Ref	Site	Size	Units	Type	Viability
BRI01	Land East of Astley School Briston	1.43	40	Greenfield	£637,822
BRI02	Land West of Astley School Briston	1.95	50	Greenfield	£785,831
C07	Land Gurney' s Wood, Norwich Road, Cromer	0.84	22	Greenfield	£309,120
C10	Land at Runton Road / Clifton Park Cromer	8.02	90	Greenfield	£1,414,496
C22	Land West of Pine Tree Farm Cromer	9.71	300	Greenfield	£4,577,627
C16	Golf Practice Area, Overstrand Road Cromer	6.30	190	Greenfield	£2,899,164
C19	Land at Compitt Hills (Larners Plantation) Cromer	5.25	150	Greenfield	£2,288,814
F01/B	Land North of Rudham Stile Lane Fakenham	26.45	560	Greenfield	£6,750,202
F03	Land at Junction of A148 and B1146 Fakenham	2.16	65	Greenfield	£1,021,580
F10	Land South of Barons Close Fakenham	2.13	55	Greenfield	£864,414
HV01	Land East of Tunstead Road Hoveton	5.40	300	Greenfield	£4,577,627
LUD01	Land South Of School Road Ludham	1.20	20	Greenfield	£294,124
LUD06	Land South Of Grange Road Ludham	0.57	20	Greenfield	£323,490
MUN04/A	Land off Links Road & Church Lane Mundesley	2.50	50	Greenfield	£785,831
NW1	Land West North Walsham	87.00	1500	Greenfield	£8,855,988
NW54&NW43	Land Adjacent Mushroom Farm, A149 North Walsham	4.55	136	Greenfield	£2,075,191
ED1	Playing Field, Station Road North Walsham	3.82	115	Greenfield	£1,754,757
NW14/53	Land at Bradfield & Cromer Road North walsham	2.63	79	Greenfield	£1,241,613
SH04	Land adjoining Seaview Crescent Sheringham	1.68	45	Greenfield	£717,550
SH18/1	Land South of Butts Lane Sheringham	2.74	80	Greenfield	£1,257,330
ST19/A	Land Adjacent Ingham Road Stalham	2.33	100	Greenfield	£1,525,876
ST23	Land North of Yarmouth Road, East of Broadbeach Gardens Stalham	2.10	80	Greenfield	£1,154,549

MIXED HOUSING – ZONE 2 – 45% Affordable Housing

Mixed Housing Viability Results		Zone 1		0-5 Year Delivery	
Ref	Site	Size	Units	Type	Viability
BLA04	Land East of Langham Road Blakeney	4.40	40	Greenfield	£118,681
H04	Land South of Lodge Close Holt	7.10	100	Greenfield	£229,843
H17	Land North of Valley Lane Holt	0.90	30	Greenfield	£99,040
H19	Land West Of Norwich Road Holt	2.00	50	Greenfield	£148,351
H20	Land at Heath Farm Holt	5.00	150	Greenfield	£344,764
W01	Land to rear of Market Lane Wells	0.78	20	Greenfield	£66,026
W07/1	Land Adjacent Holkham Road Wells	2.60	60	Greenfield	£178,021

7 Conclusions

Key Findings - Residential Viability Assessment

7.1 The North Norfolk District Local Plan sets out the strategy to deliver housing over the plan period. The Plan Wide Viability assessment illustrated that firstly, in general terms, housing development proposed in all locations in the North Norfolk District Local Plan are broadly viable and, secondly, can accommodate CIL charges in the event the Council wish to pursue CIL. The assessment of residential land and property values indicated that the Authority did possess significantly different residential sub-markets that warrant differential value assumptions being made in the Whole Plan Viability Assessment and, potentially, a differential rate approach to CIL based on two geographical zones. These are set out in the zone maps at Section 4.

7.2 The viability results are summarised in the table below. The figures represent the margin of viability per sqm taking account of all development values and costs, plan policy impact costs and having made allowance for a competitive return to the landowner and developer. In essence a positive margin confirms whole plan viability and the level of positive margin represents the potential to introduce additional developer contributions such as CIL.

NCS		SHMA Mix Maximum Potential CIL Rates per Sqm				
Sub-Market/Base Land Value	Edge Principal Town Large	Edge Principal Town Medium	Edge Service Centre	Village Edge	Village Infill	
Zone 1 – 25% Affordable						
Greenfield	£103	£123	£124	£130	£124	
Brownfield	£37	£56	£56	£63	£57	
Zone 2 - 45% Affordable						
Greenfield	£247	£265	£265	£277	£249	
Brownfield	£160	£175	£175	£181	£158	
NCS		10% LCHO Mix Maximum Potential CIL Rates per Sqm				
Sub-Market/Base Land Value	Edge Principal Town Large	Edge Principal Town Medium	Edge Service Centre	Village Edge	Village Infill	
Zone 1 – 25% Affordable						
Greenfield	£123	£144	£145	£150	£147	
Brownfield	£58	£76	£77	£83	£80	
Zone 2 - 45% Affordable						
Greenfield	£254	£272	£272	£285	£257	
Brownfield	£167	£182	£182	£188	£166	

7 Conclusions

7.3 The comparative tables above illustrate the CIL potential of housing development based on 25% Affordable Housing Delivery in Zone 1 and 45% Affordable Housing delivery in Zone 2. The first table illustrates results based on the SHMA Tenure Mix (20% Low Cost Home Ownership and 80% Affordable Rent). The second table illustrates the results based on 10% Low Cost Home Ownership delivery overall.

7.4 A separate assessment of C3 Sheltered/C2 Extra Care accommodation for the elderly was undertaken elderly based on 25% Affordable Housing in Zone 1 and 35% Affordable Housing in Zone 2 (SHMA Mix). The results are set out in the table below.

Sub-Market/Base Land Value	Elderly C2/C3 Mixed Housing	Elderly C2/C3 Apartments
Zone 1		
Greenfield	£279	£91
Brownfield	£217	£35
Zone 2		
Greenfield	£322	£132
Brownfield	£249	£58

7.5 The results illustrate that the Council's Affordable Housing targets can be viably delivered by retirement development.

Allocated Site Viability Appraisal Conclusions

7.6 The viability testing of proposed residential sites in North Norfolk District has been undertaken, accounting for the following policy impacts and key assumptions :-

- Greenfield or Brownfield Development
- Delivery Timescale
- Affordable Housing Delivery of 25-45%
- Key Planning Policy Cost Impacts
- Community Infrastructure Levy
- Residual Planning Obligation Allowances
- Site Specific Abnormal Costs and Mitigation Factors

7 Conclusions

7.7 The study is a strategic assessment of whole plan viability and as such is not intended to represent a detailed viability assessment of every individual site. The study applies the general assumptions in terms of affordable housing, planning policy costs impacts and identified site mitigation factors based on generic allowances. It is anticipated that more detailed mitigation cost and viability information may be required at planning application stage to determine the appropriate level of affordable housing and planning obligation contributions where viability issues are raised. The purpose of the study is to determine whether the development strategy proposed by the Plan is deliverable given the policy cost impacts of the Plan.

7.8 The study illustrated that all of the proposed sites are broadly viable based on the adopted assumptions including 25% Affordable Housing in Zone 1 and 45% Affordable Housing in Zone 2 as well as the potential imposition of CIL charges.

Commercial Viability Assessment

7.9 The initial assessment of commercial land and property values indicated that there were not significant differences in values to justify differential sub-market based assumptions. It can be seen that food supermarket retail and general retail uses demonstrate positive viability. All of the remaining commercial use class appraisals indicate negative viability.

Sub Market Area/Charging Zone	Maximum Commercial CIL Rates	
	General Zone	
	Greenfield	Brownfield
Industrial B1b B1c B2 B8	-£375	-£442
Office B1a	-£808	-£834
Food Retail A1	£375	£326
General Retail A1 A2 A3 A4 A5	£99	£76
Residential Institution C2	-£832	-£851
Hotel C1	-£40	-£69
Community D1	-£2,292	-£2,316
Leisure D2	-£160	-£207
Agricultural	-£673	
Sui Generis - Car Sales	-£527	-£558
Sui Generis - Vehicle Repairs	-£1,188	-£1,230

7 Conclusions

7.10 It should be stressed that whilst the generic appraisals showed that most forms of commercial and employment development are not viable based on the test assumptions, this does not mean that this type of development is not deliverable. For consistency a full developer's profit allowance was included in all the commercial appraisals. In reality many employment developments are undertaken direct by the operators. If the development profit allowance is removed from the calculations, then much employment development would be viable and deliverable. In addition, it is common practice in mixed use schemes for the viable residential element of a development to be used to cross subsidise the delivery of the commercial component of a scheme.

7.11 The assessment indicates that only food supermarket retail, with CIL potential rate of £326-£375 per square metre, dependent on existing land use and general retail with potential rates of £76-£99 provide a margin to introduce CIL charges. It is therefore recommended on the existing evidence, that in the event that the Council pursue CIL, all non-retail categories should not be charged.

CIL Appraisal Conclusions

7.12 The study demonstrates that most of the development proposed by the Local Plan is viable and deliverable taking account of the cost impacts of the policies proposed by the plan and the requirements for viability assessment set out in the NPPF. It is further considered that additional margin exists, beyond a reasonable return to the landowner and developer to accommodate CIL charges.

7.13 In terms of CIL, it is recommended that there are sufficient variations in residential viability to justify a differential zone approach to setting residential CIL rates across the North Norfolk District area.

Housing Units Without Planning Permission Projected in Plan Period	Housing Units	
Zone 1		
Greenfield	4300	87%
Brownfield	640	13%
Zone 2		
Greenfield	1260	89%
Brownfield	150	11%

7.14 The table above illustrates the dwellings estimated over the plan period that may be affected by the introduction of CIL Charges. The table clearly illustrates that the majority of residential development will be on greenfield land and as such the greenfield viability results should guide the proposed CIL Charges.

7 Conclusions

7.15 Taking account of the viability results, the generic nature of the tests, a reasonable buffer to allow for additional site specific abnormal costs, in the event North Norfolk District Council wish to pursue CIL, we would recommend the following zonal rates. North Norfolk District has a primarily greenfield residential delivery strategy and this has been taken into account in the recommended rates. The proposed residential rates are considered deliverable based on differential affordable housing delivery of 25% in Zone 1 and 45% in Zone 2 (based on either 10% Low Cost Home Ownership or the SHMA Mix). In addition separate rates are recommended for C2/C3 retirement apartments based on differential affordable housing delivery of 25% in Zone 1 and 35% in Zone 2.

Residential CIL		
Zone 1 Housing & C2/C3 Retirement Housing	25% Affordable	£50 sqm
Zone 2 Housing & C2/C3 Retirement Housing	45% Affordable	£100 sqm
Zone 1 C2/C3 Retirement Apartments	25% Affordable	£25 sqm
Zone 2 C2/C3 Retirement Apartments	35% Affordable	£35 sqm

7.16 It is recommended that a single zone approach is taken to setting commercial CIL rates. The viability assessment results indicate that all non-retail commercial uses should be zero rated.

7.17 The retail viability assessment results indicate that differential rates could be legitimately applied to both types of retail use and, in the case of food supermarket development also to scale of development. Based on the viability assessment results and taking account of a reasonable viability buffer, the following Commercial CIL rates are recommended.

Districtwide	
All Non-residential uses (excepting Retail)	£0sqm
Districtwide	
General Retail A1-A5 (excluding Food Supermarket)	£50sqm
Food Supermarket A1	£100sqm

CIL Revenue Potential

7.18 In order to estimate residential CIL over the plan period, the recommended CIL rate is applied to an average dwelling size of 90 sq metres for eligible dwellings. In North Norfolk District, if a decision is made to implement CIL, based on the table at para 7.7 above a maximum of 6350 houses would be potentially liable for CIL. Assuming 25-45% of these are exempt as affordable Housing dependent on zone, the projected CIL liable floorspace is as follows :-

7 Conclusions

Zone 1 3705 units x 90sqm = 334500sqm

Zone 2 776 units x 90sqm = 69840sqm

7.19 The floorspace projections for commercial categories of development that would be liable for CIL, over the plan period, are not known at this stage but are unlikely to amount to significant sums, when taken with residential revenue, that would exceed the Infrastructure Funding Deficit set out in the table below.

Charging Zone	Category	CIL Rate	Eligible Floorspace	CIL Revenue
Zone1	Housing	£50	333450	£16,672,500
Zone 2	Housing	£100	69840	£6,984,000
Districtwide	General Retail	£50	TBA	£0
Districtwide	Food Supermarket	£100	TBA	£0
			Total	£23,656,500

Conclusion

7.20 In conclusion, the assessment of residential sites in North Norfolk District has been undertaken with due regard to the requirements of the NPPF and the best practice advice contained in 'Viability Testing Local Plans'. It is considered that all sites are broadly viable across the entire plan period taking account of the Affordable Housing requirements and all policy impacts of the Local Plan as well as the potential introduction of CIL in the future. Overall the study concluded that even if the Council decided not to collect developer contributions through CIL the assessment shows that the emerging local plan remains viable and the 25/45% affordable housing rates proposed are demonstrably deliverable.

7.21 The study is a high level assessment of whole plan viability and as such is not intended to represent a detailed viability assessment of every individual site. The study applies the general assumptions in terms of affordable housing, planning policy costs impacts and identified site mitigation factors based on generic allowances. It is anticipated that more detailed mitigation cost and viability information may be required at planning application stage to determine the appropriate level of affordable housing and planning obligation contributions where viability issues are raised. The purpose of the study is to determine whether the development strategy proposed by the Plan is deliverable given the policy cost impacts of the Plan and, secondly, whether it is viable in principle to introduce a Community Infrastructure Levy Charging Schedule.

7 Conclusions

7.22 It should be noted that this study should be seen as a strategic overview of plan level viability rather than as any specific interpretation of North Norfolk District Council policy on the viability of any individual site or application of planning policy to affordable housing, CIL or developer contributions. Similarly the conclusions and recommendations in the report do not necessarily reflect the views of North Norfolk District Council.

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**Heb Surveyors
Valuation Report
2018**

DRAFT

**Gleeds
Construction Cost Study
October 2017**

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