

Matter 5 – Infrastructure and viability

Issue – Does the Plan set out a robust and viable framework for the delivery of growth and infrastructure?

[Policy WSP 12 Sustainable transport]

[Policy WSP 13 Transport network]

[Policy WSP 14 Influencing the demand for travel]

[Policy WSP 19 Digital infrastructure]

[Policy WLP 26 Access and highway safety]

[Policy WLP 69 Viability review]

[Allocation Alignment for HS2 Phase 2b - vol 1 p.183]

[Allocation South Featherstone Link Road LP1335 - vol 1 p.184]

[Allocation Barnsley Canal Restoration - vol 1 p.185]

[Allocations Transport schemes - vol 2 p.59, p.94, p.125, p.201, p.224, p.272, p.280, p.339]

[please note, in some cases further specific questions relating to infrastructure schemes are included in the Matters on specific development sites]

Questions

Viability

p) Is the Council's residential viability testing in document 1.37 based on robust assumptions and does it capture all of the cumulative impacts of the policies on development schemes? Are Green Belt compensatory measures accounted for?

1. The HBF is concerned at some of the cost assumptions used by the Council as part of the viability testing. For example, the viability assessment suggests that a cost allowance of £250 per unit has been included within the assessment for the EV Charging policy, this is not in line with the Government's assessment of the costs. The Government's consultation on Electric Vehicle Charging in Residential and Non-Residential Buildings suggests that installing charge points in residential buildings will add an additional cost of approximately £976 per car parking space for an average home. The HBF is also concerned that the allowance of £1,500 per unit for S106 costs is particularly low and not necessarily reflective of the policy requirements in the Plan.
2. The HBF could not find information within the Viability Assessment of the consideration given to Green Belt compensatory measures.

q) The residential viability work shows housing development in Value Area 4 to be marginal or unviable. How will viability be mitigated to allow development to come forward in these locations? Which of the Plan allocations containing housing are located in Value Area 4?

3. The HBF is concerned at the viability issues identified in value area 4. The HBF consider that it will be important for the Council to ensure that they can identify how viability can be addressed in these areas to ensure that development can come forward and homes can be delivered.

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r) *Does the Council's commercial viability testing in document 1.38 cover a reasonable breadth and range of assessment work? How were the two specific employment sites selected for viability testing? Are they representative of the range of different sizes, types and locations of employment allocations in the Plan? Why are typologies or area-based assessments not included?*

4. The HBF does not wish to comment on this question at this time.

s) Where developer contributions are identified as a key funding source for large-scale highways and transport schemes in the IDP, how has this been factored into the site-specific viability testing in documents 1.37 and 1.38?

5. The HBF does not wish to comment on this question at this time.

t) Overall, does the Council's viability work demonstrate that the Plan is deliverable?

6. The HBF is concerned that the viability work shows that there viability issues within value area 4 and with a number of the strategic site appraisals, this is likely to have implications for the deliverability of the Plan.

u) Is the viability review framework in Policy WLP 69 justified, clear and consistent with paragraph 58 in the NPPF and PPG on Viability?

7. The NPPF¹ states that it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. It goes on to state that the weight to be given to the assessment is a matter for the decision maker having regard to the circumstances. It then suggests that these circumstances could include whether the Plan and the viability evidence underpinning it is up to date and whether there is any change in site circumstances since the Plan was brought into force. This does not appear to be in line with the first line of Policy WLP 69 which states that the NPPF identifies a limited number of exceptional circumstances where it may be relevant for the applicant to demonstrate whether circumstances justify the need for a viability assessment.

8. The HBF considers that given the viability issues highlighted within the Viability Assessment the Council should not be seeking to restrict the potential to utilise a viability assessment as part of a planning application process. It is evident there are viability issues already identified and therefore, further circumstances should not need to be identified in relation to applications.

9. The HBF considers that there may be some circumstances where deferred planning obligations can be utilised to bring forward the delivery of homes. However, the HBF has significant concerns around the implementation of this policy and how frequently it will be used. It is considered this will add further burdens to any developer who will need to reproduce viability assessments at a potentially regular basis, going against Government initiatives which are looking to reduce the need for viability assessments. The HBF considers that this policy causes unnecessary uncertainty and additional risk for developers, and that such disincentivising of developers could become an

¹ Paragraph 58

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impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods.