

Miny Schofield
Programme Officer
c/o Wakefield District Council,
Spatial Policy Group,
Planning and Transportation,
Wakefield Council
Wakefield One,
PO Box 700,
Wakefield,
WF1 2EB

SENT BY EMAIL
programmeofficer@wakefield.gov.uk
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Dear Miny Schofield,

WAKEFIELD LOCAL PLAN: CONSULTATION 3 – EX.WDC26 NOTE ON VIABILITY IMPACTS OF ACCESSIBLE HOUSING STANDARDS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Note on Viability Impacts of Accessible Housing Standards.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The Council propose a policy which looks for 9% of homes to meet the M4(2) standard, and for 3% of homes to meet the M4(3) standard. The viability of these requirements were discussed at the Local Plan Examination Hearing Sessions. Originally, the Viability Assessment assumed that the M4(2) standard was capable of being addressed from within the standard build costs and the M4(3) would cost a circa of £3,000-£5,000 per unit.
4. The Council have updated the Viability Assessment to take account of the estimated costs for the M4(2) and M4(3) from the EC Harris Report¹. They highlight the range of costs identified in the EC Harris Report as:
 - M4(2) cost range of £520 to £940 per unit
 - M4(3) cost range of £7,764 to £23,052 per unit
5. The Council then propose to use the mid-point of these ranges as part of their viability assessment. The HBF does not consider that the use of the mid-point is appropriate.
6. The EC Harris Report identifies the following costs:

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/353387/021c_Cost_Report_11th_Sept_2014_FINAL.pdf



	1 Bed Apartment	2 Bed Apartment	2 Bed Terrace	3 Bed Semi Detached	4 Bed Detached
Cost all dwellings (extra over current industry practice)					
M4(2)	£940	£907	£523	£521	£520
M4(3) Adaptable	£7,607	£7,891	£9,754	£10,307	£10,568
M4(3) Accessible	£7,764	£8,048	£22,238	£22,791	£23,052

7. The original Viability Assessment identifies the housing mix percentages for each scheme type assessed it shows that a mix that includes 0% apartments were assessed on schemes 1 to 8, and that only 25% apartments were assessed on schemes 9 to 12.
8. The HBF is concerned that the use of the mid-point figure for the M4(3) standard significantly under-estimates the costs given the housing mix that is assessed in the viability assessment and that is likely to be delivered. The HBF considers that it would have been more appropriate to have assessed the costs of the standard in line with the expected housing mix. Or alternatively, in line with the identified need for a particular house size in relation to the evidence for the M4(3) requirement.
9. The Council goes on to suggest within their note that the viability model includes a contingency allowance of 3%, and that therefore, the cost increases could be absorbed within the contingency allowance. The HBF is concerned that the costs associated with a known policy requirement would be considered appropriate to be included within the contingency allowance. The HBF considers that this is not appropriate, particularly as the HBF considers that the costs are likely to be higher than those currently identified.

Future Engagement

10. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
11. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



Joanne Harding
Planning Manager – Local Plan (North)

Email: joanne.harding@hbf.co.uk

Phone: 07972 774 229

