HBF
HOME BUILDERS FEDERATION

Spatial Policy Team
Durham County Council

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11/04/2023

Dear Planning Policy Team,

DEVELOPMENT VIABILITY, AFFORDABLE HOUSING AND FINANCIAL CONTRIBUTIONS SUPPLEMENTARY PLANNING DOCUMENT (SPD)

1. Thank you for consulting with the Home Builders Federation (HBF) on the Development Viability, Affordable Housing and Financial Contributions Supplementary Planning Document (SPD).

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 HBF welcomes the invitation to engage on this current SPD and the workshop which was hosted by the Council. The HBF hopes that this ongoing discussion and engagement can help to ensure that this SPD, and the wider suite of planning documents, deliver Durham's aspirations and sufficient homes throughout the Plan period.

4. The SPD affords the industry and Council the chance to review the validity of various inputs which supported the County Durham Plan (CDP) and to reflect the shifting legislative landscape around development and in particular the housebuilding industry. There have been a significant amount of changes introduced since the CDP evidence base was prepared and the preparation of this SPD provides an excellent opportunity to reflect the current picture to ensure housing needs are met throughout the plan period.

5. As you will be aware, members of the HBF have been involved with the viability work in Durham over an extensive period, including during the production of this SPD and during the consultation of the now adopted local plan, worked with bodies such as RICS to try our best to assist Durham County Council (DCC) in developing the County Durham Plan. In particular, to ensure that the CDP that was deliverable, viable and capable of achieving the housing requirement.

6. As an industry there is a strong desire to invest in County Durham, to enhance existing settlements and to use new homes as a catalyst for regeneration across many parts of

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the County. However, as we've expressed previously, we have an increasing concern over the role planning policy is playing in the investment potential of the County. In our view the CDP is not delivering as anticipated and a number of the assumptions upon which it was based have either changed or been shown to be inaccurate.

Delivery

7. A number of HBF members have significantly fewer sales outlets in County Durham now as compared to October 2020 when the Local Plan was being examined. The economic impact of this reduction in sales outlets and homes which Developers can build, and sell, is significant. The below demonstrates the economic impact on the County between October 2020 and February 2023 (infographic available as Appendix 2.1):

- 718 fewer construction jobs
- 977 fewer indirect jobs in areas supporting new house building
- £7,458,000 reduction in 'first occupation' spend – much of which is spent within the County
- £1,878,060 reduction in Council Tax receipts each year
- £7,512,240 reduction in New Homes Bonus payments to the Council
- £17.6m reduction in Section 106 monies

*based on 6 HBF members

8. The figures above, coupled with the trajectory work set out within this response, show that Durham is losing out on significant investment which is being redirected elsewhere in the north-east. Durham has had great success in attracting economic investment over the past decade however without the delivery of new homes required to support employment opportunities within the County the long—term benefits of these investments will not be reaped by Durham and its existing residents and businesses.

9. Our response addresses these points in full however we feel it necessary to set out the implications of these matters and why they are causing concern for the home building industry. Below we have reviewed two key indicators which demonstrate that the CDP is not delivering as anticipated – namely the number of outlets for new homes and the delivery trajectory of new homes.

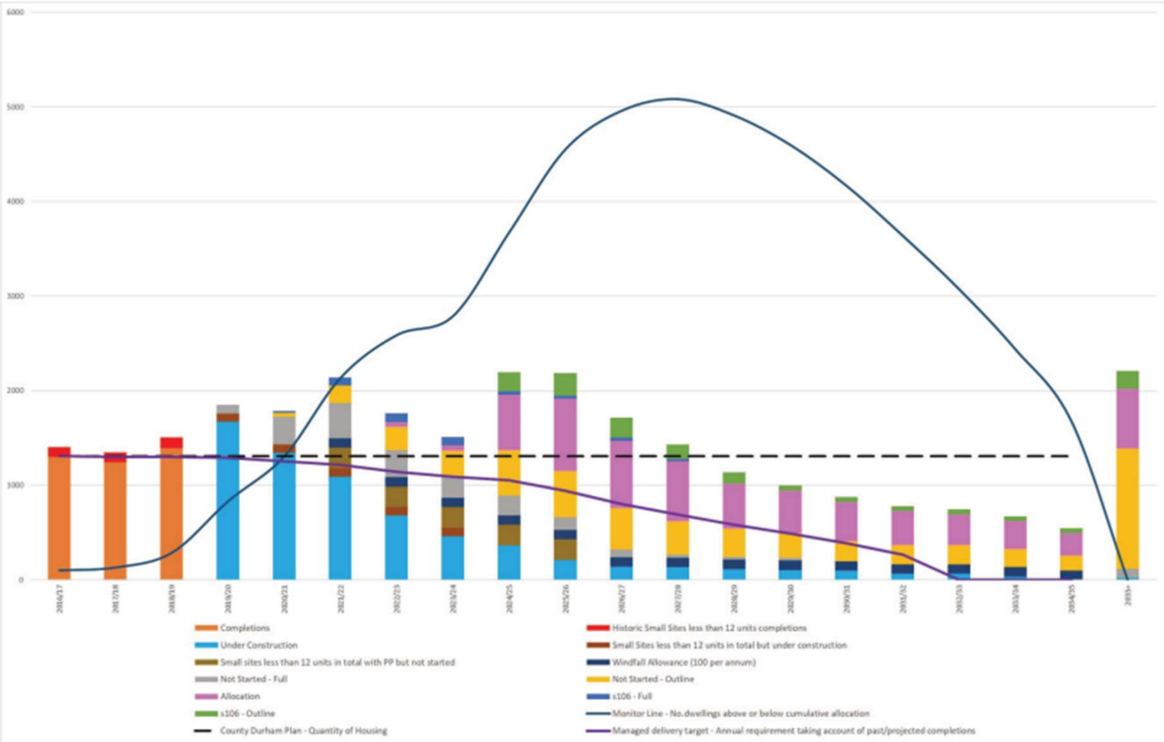
Outlets

10. We have surveyed 6 of our members (including the UK's largest four housebuilders) to understand the position of their business within the County since the CDP was at Examination in Public (EiP). The evidence shows that since EiP in October 2020 these companies have 9 fewer sales outlets across County Durham, with this number expected to rise to 19 fewer outlets by this time next year. Putting this into housing numbers, the developers have nearly 1,400 fewer consented homes to sell than October 2020.

Trajectory

11. The trend of reduced outlets evidenced above, in particular the further drop off by 2024, indicates that Durham's housing trajectory is trending towards ever reducing numbers of new homes. This is in stark contrast to the trajectory put forward as part of the CDP

(below and Appendix 2.1) which anticipated 2024/25 and 2025/26 to have the highest rates of delivery across the plan period.



12. Analysis undertaken by Pegasus Group (Appendix 2) confirms that there's a real possibility that local housing need will not be met in the coming years. The impact of this is significant for the County financially as investment will leave County Durham and the wider benefits of new homes are not felt through the local economy. Moreover, Durham County Council's corporate aspiration of bringing new and better jobs to the area will not be supported by the homes to support these jobs, threatening their delivery and Durham's ability to capture the increase in population though taxation and general spend within the County.

13. A significant proportion of the delivery since adoption of the CDP has been through historic sites which were approved pre-Examination of the CDP. A number of these sites are due to be completed in the coming year, hence the 19 fewer outlets predicted by the surveyed developers between now and March 2024.

14. This consistent reduction in outlets looks set to continue based on a review of the allocations and sites coming forward through Policy 6 (below). The end result is a County which is providing fewer homes than it has planned for, which ultimately represents a failure of the Local Plan, and a failure to allow for continued investment by HBF members in the County.

Policy 6

15. Analysis of the CDP's allocations (Appendix 2 and 2.3) shows that they are not coming forward as anticipated in the CDP. This is for a variety of reasons; however, it causes a

problem given that the CDP did not over-allocate to ensure headroom for this kind of scenario. Instead, Policy 6 was viewed as a mechanism to ensure that non-allocated land could come forward should allocations under deliver. The HBF recommends that close monitoring of Policy 6 is required and this should include considerations such as:

- How many units has policy 6 actually delivered?
- What size/type?
- What location?

16. The HBF does not believe that the purpose of Policy 6 is to act as a release valve for continuous and significant shortfalls in housing delivery. Policy 6 is a policy that is supported by the industry, however, it does have limitations and cannot be viewed as a 'safety net' which will ensure local housing needs are met throughout the plan period. There are two primary factors which limit the effectiveness of Policy 6 in meeting shortfalls in the delivery trajectory:
    - Policy 6 sites will not deliver consistently across the plan period. We expect the most suitable Policy 6 sites to already be in the system as applicants seek to bring them forward as quickly as possible after adoption of the CDP. As time progresses the overall suitability of new Policy 6 sites will decrease as the 'best' sites have been progressed early in the plan period, leading to less suitable and sustainable sites coming forward. In this instance the Council need a robust housing supply to reduce pressure on approving such sites.
    - Policy 6 will not deliver in the most sustainable locations. The Policy does not allow even application across the County as it is not applicable outside settlement boundaries defined in a Neighbourhood Plan. In County Durham there are made Neighbourhood Plans in Cassop-cum-Quarrington, Cotherstone, Durham City, Great Aycliffe, Lanchester, Oakenshaw, Sedgefield, Whorlton and Witton Gilbert and further Plans in production or Neighbourhood Areas approved in Barnard Castle, Bearpark, Branspeth, Belmont, Coxhoe, Dene Valley, Eggleston, Ferryhill, Gainford and Langton, Haswell, Middridge, Monk Hesleden, Sherburn Village, Shotton, Stanley, Startforth, Tow Law and West Auckland. As a result of this coverage, Policy 6 does not apply to development outside of existing settlement boundaries in many settlements. This significantly reduces the potential of major sites (10+ homes) coming forward in these key settlements and therefore drastically impacts the role which Policy 6 can play in making up shortfalls across the County.

Durham County Council Sites

17. The CDP allocates 27 sites for residential development through Policy 4, of which 12 are on land owned or controlled by Durham County Council. In light of the industry's concerns over the deliverability of a number of allocated sites for the reasons set out in this representation, it is imperative that the Council brings its landholdings to the market quickly and efficiently to ensure a continued supply of land, and subsequent housing delivery, across the County.

18. We are aware that the Council recently secured consent for a new primary school at housing allocation site H24 (application ref. DM/21/04097/FPA). The loss of this allocated site raises concerns over the deliverability and corporate strategy for delivery over other Council owned allocated sites.

19. A number of DCC sites are within low to medium viability areas and therefore are likely to be on the cusp of being viable according to the typologies provided in the updated plan viability assessment. At the EiP DCC Officers confirmed to the Inspector that the Council had the ability to accept lower land values than a private owner in order to bring sites forward. We would welcome an update on this position and confirmation as to whether this has been formally agreed in relation to the sites that will be brought to the market.

Plan Viability

Typologies & Gross to Net Ratios

20. As raised within the HBF's initial response to the Development Viability SPD; the industry retains significant concerns in respect to the viability assumption with regard to Gross to Net Ratios.

21. It is understood that the February 2023 Local Plan Viability Testing update retains the Site Typologies utilised within the original June 2018 report, which can be summarised as follows.

Table 1

Site Type (dwellings)	Density (units per net Ha)	Gross to net Ratio %	Extrapolated Gross Area (Ha)	Extrapolated Net Area (HA)
5	30	90	0.19	0.17
20	30	90	0.74	0.67
50	32.5	85	1.81	1.63
80	32.5	85	2.90	2.61
125	35	80	4.46	4.02
200	35	80	7.14	6.43
350	35	80	12.50	11.25

22. At the time of the 2018 Viability the 80-90% gross to net ratios were likely reflective of achievable net developable ratios at the time. However, the introduction a policy requirement to achieve a Biodiversity Net Gain, rising to a 10% net gain later this year will significantly reduce the gross to net ratios achievable on development sites moving forward.

23. It is acknowledged that the 2023 Viability Update seeks to make cost provisions for Biodiversity Net Gain, however, no consideration is given to the implications upon the net developable area potential of achieving net gain onsite, given the Government's preference for on-site delivery.

24. To evidence the significance of the effect of onsite BNG the below table provides an assessment of several sites which are either recently approved or currently in the planning process with Durham.

Table 2

Developer	Site	Units	Gross (Ha)	Net (Ha)	Gross to Net Ratio %	Density (units/net Ha)
Persimmon	High West Road, Crook	260	14.81	6.73	45.4	39
Persimmon	Consett, Templetown	176	12.58	5.4	42.9*	33
Persimmon	Aykley Heads Ph2	48	2.04	1.29	63.2	37
Millers	Delves Lane	288	16.64	9.1	54.7	32
Taylor Wimpey	Pelton Fell	80	5.58	2.58	46.2**	31

*1% BNG not achievable onsite (additional offsite mitigation required)
**10% BNG sought

25. It is appreciated that BNG implications are site specific and much dependent upon the scope and quality of existing habitats inputted into the base habitat calculation. However, the above table highlights that gross to net ratios of between 43-63% are being achieved. Far lower than the 80-85% gross to nets assumed in the corresponding site typologies.

26. The implications on reduced gross to net ratios cannot be underplayed, as quite simply this is a significant restriction upon the revenue generating potential of all sites and should be sensitivity tested.

27. To highlight the potential implication of this significant net area reduction on the viability of the Plan; the table within appendix 3 of this representation seeks to calculate a residual £/net HA (residual value / Extrapolated net Ha (see table 1) and applies this to a revised net HA (assuming a conservative 60% net developable area), creating a revised Residual price which can be considered against the BMLV, which remain unchanged.

28. The Table in Appendix 3 shows that at a 60% Gross to Net ratio a total of 27 of 48 site typologies are rendered unviable.

Revenues

29. It is fully accepted by HBF members that a continued undersupply of housing nationally since 2018 with record low borrowing rates has continued the trend of house price increases. The Covid pandemic, creating pent up demand and race for space, coinciding with a 15-month SDLT reduction and availability of Help to Buy; did, in combination, create a significant lift in house prices.

30. In 2023 and looking forward, the housing market picture is starkly different. SLDT has been increased back to normal rates; Help to Buy has ended, BoE interest rates are at a 15 year high and continue to increase; whilst inflation is running at 10.4%. All of which is significantly reducing the affordability of housing across the sector.

31. Accordingly, it is appreciated that an adjustment to revenues is considered and applied within the report with a reduction applied to the 2017 (+HPI) Revenues, which are summarised below.

Market Area	2017 adopted rev £/sqm	2017 adopted rev + UK HPI £/sqm	2023 adopted revenues £/sqm	% Adjustment	Adjusted
Highest Value	£2,500	£3,270	£3,100	5.19	% decrease
High Value	£2,150	£2,812	£2,750	2.2	% decrease
Medium Value	£1,900	£2,485	£2,500	0.6	% increase
Low Value	£1,750	£2,289	£2,100	8.2	% decrease

32. However, the 2023 report gives no justification for the rate of reduction applied nor as to why different rates of adjustments (including a 0.6% increase in the medium value area) have been applied. As the same market influences are being experience by potential buyers across all market areas, it is logically that a single rate of adjustment should be applied.

33. Further to the above, it is understood that Revenue evidence within all iterations of the Plan Viability Reports continue to be derived from Selling Prices reported to Land Registry.

34. HBF members review of the revenue evidence supplied within Appendix 1 of the 2023 update continue to show inconsistencies against members sales data for the period.

35. At this macro-data level it is difficult to pinpoint exactly the cause of this however the HBF continue to have significant concerns that Land Registry Prices continue to inflate revenues through the reporting of Gross Selling Price, rather than net prices (net of incentives and extras).

36. This criticism has been raised previously and was addressed within the 2019 Report within which it was stated *"With respect to sales incentives, we note the following as stated within HM Land Registry Guidance "Practice guide 7: entry of price paid or value stated data in the register";*

    "Discounts and Incentives: Often developers offer discounts and incentives to prospective buyers. In this case we enter the net (lower) price in the register. If we are unable to identify the net price, we will request this. The reason for this is that entry of the pre-discount price may be misleading. Certain incentives, such as legal and moving costs, are not treated as a discount for price paid purposes""

37. It is noted that the Land Registry Practice Guide 7 latest guidance on this point states:

    "Often sellers offer discounts and incentives to prospective buyers.

*We consider that a **<u>discount is a cash sum deducted from the purchase price</u>**. A discount may also be referred to as an equity discount, a gifted deposit, a gifted equity or cashback. When a property transaction **<u>includes a discount</u>**, **<u>we will deduct the value of the discount from the gross price and enter the net (lower) price paid in the register.</u>** If we are unable to identify the net price, we will request this. For example, where a sale is stated to be for £300,000 and this includes a deposit of £30,000 paid by the seller, we would record the price paid as £270,000.*

*Where a consideration includes an **<u>incentive, our practice is to enter the gross price</u>**. We consider that an incentive is something like help with moving costs, the seller paying legal costs or stamp duty land tax or land transaction tax, providing carpeting or white goods, or upgraded kitchen and bathroom fittings because these don't involve a sum being deducted from the sale price."*

38. In none of the Viability Reports to date has an allowance for Incentives been applied to revenues. In current market conditions the role, and cost, of incentives having to be offered to assist buyer and secure sales is increasing. The viability should be updated to reflect this fact with an allowance made against assumed revenues for incentives.

<u>Build Costs</u>

39. It is understood that with respect to Build Costs the 2023 Viability update seeks to retain the use of BCIS General Estate Housing (rebased to Durham) and updated to current day as Build Cost Source, applying median BCIS to Site Type 2 and Lower Quartile BCIS to Site Types 3-7.

40. This appears to generate a 15-16% uplift in BCIS build costs during this period. It would however be appreciated if evidence of the BCIS General Estate Housing (rebased to Durham) base and updated Index can be appended to the report.

41. As is acknowledged in the 2023 Viability Report to ensure robustness of testing there is a need for forthcoming build cost increases in respect to Building Regulation amendments to be considered. The 2023 report details that an allowance of £5,000 per dwellings has been allowed in the appraisals (in addition to BCIS) to achieve 2021 Part L compliance. This £5,000 allowance is considered acceptable by the HBF.

42. However, Building Regulations are set to be upgraded further to Future Homes Standard in 2025. As transitional arrangements now confirm that Building Regulation standards are to be applied on a plot start basis, as opposed to site start, it is a certainty that all sites not yet implemented will be FHS compliant and bear the costs associated.

43. Accordingly, to ensure robustness of testing, the HBF are firmly of the opinion that an additional allowance should be made for FHS compliance; above the £5,000 per plot for 2021 Part L. The HBF suggests an additional figure of at least £7,500 per plot for FHS should be allowed.

44. BCIS build costs cover plot construction costs, site preliminaries and contractor overheads. As they are backward looking the HBF have concerns that the BCIS costs

underplay the implications of reduced sales rates in respect to Overheads costs. Many of our members have provided trading updates to the market this year and indicated anticipated annual completions to fall in 2023 by circa 30-40% based upon early reservation and cancellation rates.

45. The effect of this slow-down in sales will be the elongating of build periods which will come with increased overhead costs. An allowance to reflect this in the Build Cost should be made.

Externals

46. The 2023 Viability update confirms External costs are allowed at a rate of 15% of BCIS + Part L uplift. Noting points raised above in respect to FHS and overhead cost increases; the HBF consider that the 15% External Cost allowance should be applied to BCIS + Overhead uplift + 2021 Part L + FHS.

47. Further as the it is anticipated that Gross to Net ratios are to significantly decrease due to BNG, logic follows that this shall create an increase in external costs as a percentage of Build Costs as net developable areas reduce and non-developable (external) areas increase as a proportion.

Contingencies

48. It is noted that the 2023 Viability Report retains the use of agreed 3% (greenfield) and 5% (brownfield) contingencies applied to BCIS + Externals + Part L. For reasons detailed above the HBF firmly believes the cost implications of FHS compliance should be applied and contingency allowances adjusted to reflect 15% of the Build Cost / Externals inclusive of both 2021 Part L and FHS.

Abnormals

49. The 2023 Viability report details that the previously utilised abnormal cost allowance of £75,000 per net Ha for greenfield sites and £150,000 per net Ha for brownfield sites has been retained.

50. The report however states that no inflation has been applied as an uplift to abnormal allowances as *"an uplift in abnormals has to result in a reduction in the benchmark land value".* Although principally accepted that increased abnormal costs, above the allowances, will result in a reduction in benchmark land values, the HBF considers in the interest of robustness, that inflation is applied to abnormal costs to allow the effect as to the impact on Benchmark Land Values (BMLV) to be considered.

51. Whilst National Guidance directs that abnormal costs should be reflected in Benchmark Land Values; the HBF retains significant concerns of the implications of this approach on true deliverability as ultimately if abnormals costs reduce the Benchmark Land Value to a level that owners will simply not bring land to the market. The HBF continues to be concerned that DCC appear to believe land will come to the market in any circumstance, thereby bucking the lesson of history that landowners will delay bringing land to the market until a value is generated that incentivise them to sell, as this is often seen as a once in a lifetime opportunity.

52. In 2019 the HBF supplied substantial evidence of average abnormal costs of £459,000 per net HA for greenfield sites and £711,000 per net HA for brownfield sites. Application of the 16% BCIS cost increase to these figures increases the evidenced abnormal costs sums to £532,440 per net HA (greenfield) and £824,760 per net HA (brownfield).

53. In order to ensure the abnormal costs do not erode Benchmark Land Values to below a level that a reasonable landowner will transact, DCC need to engage with owners and their Agents to establish these values and carry out sensitivity testing applying the above HBF abnormal evidence figures on top of the existing allowances. The HBF considers that the Council should seek further evidence from agents and landowners, in order to make appropriate assumptions in relation to the levels at which they are willing to sell their land, this should include considerations in relation to the levels of abnormals.

Planning Policy Assumptions

Biodiversity Net Gain

54. With regards to Biodiversity Net Gain the HBF agrees it is right to make cost allowances for BNG mitigation within the Plan Viability. The cost allowances of £900/Ha for initial site surveys appears generally reasonable, however, the HBF considers that additional allowances at the same rate should be made for the ecologist monitoring surveys and reporting which are required to be undertaken in years 1, 5, 10, 20 and 30 years following completion of the development.

55. With respect to the £19,698/Ha allowance for creation and 30 years maintenance; the HBF considers this allowance to be light. Neither the report, nor the Regulatory Policy Committee evidence provides any evidence or breakdown of how the £19,698/Ha allowance is split between creation cost and maintenance allowance. It would be expected that the majority of the BNG cost would lie in the initial habitat creation, however, equating all of the cost to maintenance alone would equate to £658/ha/p.a. allowance. Simple grass cutting of a 1ha area would exceed an annual maintenance cost of £658p.a.

Education

56. The 2017 Viability report noted at the time Primary School place provision was to be charged at £14,516 per child space and Secondary School place provision at £16,344 per child space, before advising that education contributions sought were usually below £2,500 per dwelling but acknowledging that in certain cases contributions could be in the region of £5,000 per dwelling which lead to sensitivity testing being run on education contributions equivalent to £2,500 and £5,000 per dwelling.

57. The 2023 update report details marginal Primary and Secondary costs per place increases at £14,703 and £16,554 respectively. It is however noted that, through the SPD, the Council have introduced Special Education costs into the Education calculation at a significantly higher cost per pupil place of £62,514. Though it is acknowledged that the total pupil generation calculation will not generate a greater number of pupils, the introduction of SEN will result in a proportion of the pupils generated being identified as

in Special Education Need and will bear the increased per pupil cost, resulting in a higher Education contribution on the whole.

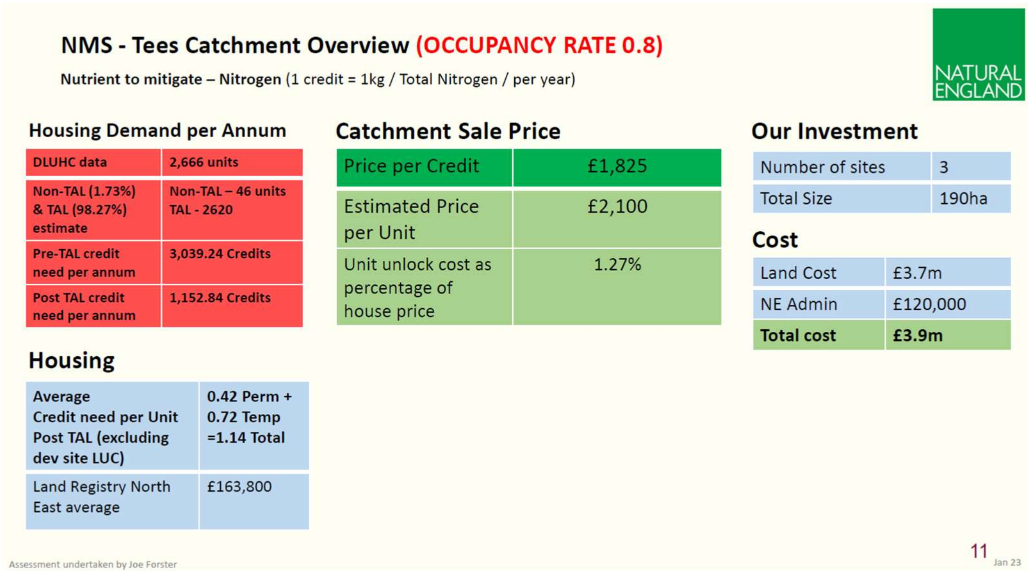
58. Accordingly, the HBF considers that an assessment should be undertaken to determine likely “worst case” Education contribution for the site typologies, assuming no existing educational capacity, and a sensitivity test up to this “worst case” per dwelling sum.

Nutrient Neutrality

59. The HBF notes that with respect to Nutrient Neutrality (NN) the 2023 update report does not factor in any allowance, owing to awaited guidance from Central Government and uncertainty around the cost to mitigate.

60. The HBF welcomes the acknowledgement in the report that Nutrient Neutrality is to be a consideration that will need to be factored in in the coming months and are happy to assist with this.

61. In order to assist a presentation given by Natural England in regards to their Nutrient Mitigation scheme is appended (Appendix 4). Within this document a cost per dwelling to mitigate NN is given as £2,100 per dwelling. This is derived from a calculated cost per NN credit of £1,825/credit and a calculated average requirement credit.



62. The HBF suggests that the Viability Update should utilise as a minimum this £2,100 per dwelling allowance for Nutrient Neutrality.

Benchmark Land Values

63. Benchmark Land Values have been retained at the rates assumed within the 2018 Viability Testing. It is acknowledged that approach taken in a Plan Viability Testing is to fix Benchmark Land Values with only £75k (greenfield) and £150k (brownfield) abnormal allowances with approach taken that any abnormal costs above these rates would be needed to be reflected in a reduced BMLV which is considered that a “reasonable” land owner should accept, without question.

64. The continued overarching concern with this is the real-life application of this approach and implication on the supply of housing land. The approach assumption that landowners, acting reasonably, will simply accept the land value generated, it however ignores the fact the in-reality landowners are not obligated to accept offers at any level and must be incentivised to sell.

65. As was detailed eloquently by the agent representation at the Viability SPD meeting with the Council, the general landownership profile in the region is that of institutional landowner, farmers and/or individuals, for which the land receipt is a once in a lifetime opportunity.

66. The HBF firmly considers that, although guided by Plan Viability in accordance with guidance, the Council must take a wider consideration of the evidence laid bare and consider what risk the cumulative policy burden and BMLV generated creates in respect to adequate housing sites coming forward to deliver their Plan objectives and not simply work on the pretext that the Plan will deliver as the Viability indicates it could be delivered. The wider question is not "can" the Plan be delivered, it is "will" the Plan be delivered.

Suggested Actions

1) **Update the Local Plan viability assessment.**
   This should take full account of the points raised through this representation to ensure that it is robust for current sites and sites to be delivered under increased regulatory burden in the near future.
2) **Update the Local Plan trajectory**
   This is required to better understand the impact of allocated sites not coming forward as predicted and also account for the current sales rates being experienced which are significantly lower than anticipated at the EiP.
3) **Publish disposal strategy for Council owned sites**
   The Council control 44% of allocated sites and as such need to clarify how and when these sites will be disposed of to ensure that they can materially contribute to the County's housing needs. The HBF can offer assistance in reviewing the Council's sites and offering pre-marketing feedback to ensure effective delivery.
4) **Agree a Policy 6 monitoring update**
   Great weight has been placed on Policy 6 to deliver new homes on unallocated sites across the County and to make up the shortfall in new homes being delivered against the CDP trajectory. The HBF suggest that a regular update should be provided setting out the details of approved Policy 6 sites so that the location, size and delivery of these sites can be better understood. The benefit of such a monitoring process will be to identify the effectiveness of Policy 6 in addressing housing shortfalls.

Future Engagement

67. I trust that the Council will find these comments useful as it continues to progress its SPDs and the delivery of the Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

68. 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,

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