

## Draft Sites for Housing Allocation – Viability Assessment

### Policy IM4 Sensitivity

The impact assessment which is an Appendix to the Government document; Electric Vehicle Charging in Residential and Non-Residential Buildings (July 2019); states that it is the Governments preferred option to require the installation of at least one charge point (minimum 7KW) as well as the necessary cabling and ducting for all parking spaces associated with new dwellings. The assessment also identifies that costs associated with off-street private charge point provision is likely to range between £615 to £1,115 per charge point<sup>1</sup>.

Within our viability report for the 'Draft Sites for Housing Allocation (August 2020)' we assumed one charging point per dwelling. However, for the purpose of our assessment we assumed that the developer would only install the ducting, cabling and backplate with the homeowners installing the actual charge point if required. On this basis the assessment only included a cost of £100 per dwelling. However, the Council has subsequently confirmed that through Policy IM4, they would also require developers to install the actual charger.

Within this context it was suggested within representations submitted to the EIP that our previous assessment did not accurately reflect the cost implications of Policy IM4 and therefore the policy would likely have major implications on the viability of most schemes and therefore needs to be fully considered.

Despite the underestimation of the costs associated with Policy IM4 our assessment has taken a caution approach with respect to other key appraisal variables; including build / construction costs. As set out within Section 3.12 to 3.13 of our original assessment we applied build costs based on lower quartile rates from BCIS. However, it is a known fact that house builders (particularly the large PLC's) don't contribute to the BCIS data and it is argued by many practitioners that the actual market rates are often much lower than the costs from BCIS. For example, recent anecdotal evidence suggests that typical build cost range between £505psm (£47psf) and £570psm (£53psf) for estate housing compared to the rates used in our assessment from BCIS of £975psm (circa £90psf). Assuming the higher 'market rate' of £570psm (£53psf) this results, as demonstrated in the table below, in a potential viability cushion of £37,500 per dwelling.

	Average Unit Build Cost (BCIS)	Average Unit Build Cost (Market)	Difference Inherent Build Cost Cushion
Houses	£90,577.5 <sup>2</sup>	£53,000 <sup>3</sup>	-£37,577.5

As outlined above the cost of an off-street charge point is likely to range between £615 to £1,115. Within this context the costs of the charge points account for only a small fraction (between 1.63% and 2.97%) of this potential 'build cost cushion'.

Whilst there is already an in-built cushion within our assessment to mitigate the cost increases associated with electric vehicle charging points, we have re-run our assessment applying the median costs (i.e. £865 per charge point). The results of our sensitivity analysis are highlighted below.

<sup>1</sup> Refer to Table 5 on Page 18 of the Impact Assessment

<sup>2</sup> Average dwelling size of 92.9sq.m (refer to Table 3.2 of our original assessment) multiplied by build cost of £975psm for estate housing (refer to section 3.12 of our original assessment).

<sup>3</sup> Average dwelling size of 92.9sq.m (refer to Table 3.2 of our original assessment) multiplied by build cost of £570psm for estate housing (refer to section 3.12 of our original assessment).

## Brighouse Local Plan Area

Local Plan Ref	Gross Site Area (HA)	Zone	Net Residual Land Value	Value £ per ha	Value £ per acre	Viable	Minimum Land Value Benchmark Exceeded	Viability by Land Type	Viability by Land and Development Type
0174	2.82	Zone 8	101,677	36,056	14,591	Yes	n/a	YesMixed	YesMixedHousing
0338	0.60	Zone 8	755,436	1,259,061	509,514	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0548	0.55	Zone 8	651,799	1,185,089	479,579	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0565	0.52	Zone 8	611,852	1,176,638	476,160	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0568	4.34	Zone 8	3,142,297	724,032	293,000	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0571	0.48	Zone 8	(3,550,328)	-	-	No	n/a	NoMixed	NoMixedApartments
0846	0.30	Zone 8	560,422	1,868,072	755,968	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0945	1.82	Zone 8	2,034,745	1,117,992	452,427	Yes	n/a	YesBrownfield	YesBrownfieldHousing
1000	0.54	Zone 8	875,707	1,621,679	656,258	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1032	1.65	Zone 8	1,508,689	914,357	370,020	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1033	3.22	Zone 8	4,022,206	1,249,132	505,496	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1053	3.73	Zone 8	2,799,302	750,483	303,704	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1054	1.23	Zone 8	1,196,356	972,647	393,609	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1060	0.64	Zone 8	815,572	1,274,331	515,694	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1077	13.02	Zone 8	5,931,099	455,538	184,346	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1078	10.62	Zone 8	10,881,562	1,024,629	414,645	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1093	1.23	Zone 8	797,307	648,217	262,319	Yes	n/a	YesBrownfield	YesBrownfieldHousing
1095	4.83	Zone 8	6,120,675	1,267,220	512,816	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1116	1.83	Zone 8	1,982,585	1,083,380	438,420	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1322	0.48	Zone 8	(2,493,581)	-	-	No	No	NoGreenfield	NoGreenfieldApartments
1469	0.44	Zone 8	763,753	1,716,792	694,748	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1468	0.85	Zone 8	655,682	771,391	312,165	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0771	0.61	Zone 8	1,193,979	1,957,342	792,093	Yes	n/a	YesBrownfield	YesBrownfieldHousing

The results of our assessment demonstrate that increasing the costs of the electric vehicle charging points has little material impact. Sites 0571 and 1322 remain unviable but as we highlighted in our original report these sites are modelled based on apartments and could be viably developed for housing. The same is true even with the higher costs for electric vehicle charging points. Site 0174 remains viable but once again generates a very low land value. As we identified in our main report this is because the density on this site, at circa 8 dwellings per hectare, is exceptionally low. Except for these sites the remaining sites (including the brownfield / mixed sites) are all viable and generate land values that are in excess of the benchmark land value for Greenfield sites (i.e. £159,000).

## Elland Local Plan Area

Local Plan Ref	Gross Site Area (HA)	Zone	Net Residual Land Value	Value £ per ha	Value £ per acre	Viable	Minimum Land Value Benchmark Exceeded	Viability by Land Type	Viability by Land and Development Type
0026	2.23	Zone 5	2,758,941	1,234,821	499,705	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0037	0.95	Zone 5	1,118,449	1,175,807	475,823	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0065	1.01	Zone 5	872,939	864,296	349,762	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0146	0.86	Zone 5	1,169,330	1,361,298	550,887	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0177	9.87	Zone 5	8,009,438	811,727	328,488	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0952	10.63	Zone 5	10,596,066	996,613	403,307	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0964	0.63	Zone 5	605,385	960,929	388,867	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0978	8.28	Zone 5	9,901,297	1,196,078	484,027	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1030	0.54	Zone 5	722,835	1,334,449	540,022	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1283	0.51	Zone 5	474,152	929,710	376,233	Yes	n/a	YesMixed	YesMixedHousing
1407	0.44	Zone 5	656,266	1,495,602	605,237	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1567	20.53	Zone 5	18,008,111	877,279	355,016	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1616	2.19	Zone 5	1,755,319	800,759	324,049	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1625	1.01	Zone 5	1,118,449	1,106,693	447,854	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1657	0.76	Zone 5	1,118,449	1,467,543	593,883	Yes	Yes	YesGreenfield	YesGreenfieldHousing

Even with the inclusion of the higher costs for electric vehicle charging all the allocations are viable and generate land values in excess of £320,000 per acre even the mixed greenfield/brownfield site (1283). Such values are more than reasonable for the landowners.

## Halifax Local Plan Area

Local Plan Ref	Gross Site Area (HA)	Zone	Net Residual Land Value	Value £per ha	Value £ per acre	Viable	Minimum Land Value Benchmark Exceeded	Viability by Land Type	Viability by Land and Development Type
0046	0.75	Zone 3	708,125	949,315	384,167	Yes	Yes	YesGreenfield	GreenfieldHousing
0103	1.25	Zone 9	427,598	343,245	138,904	Yes	No	YesGreenfield	GreenfieldHousing
0164	0.38	Zone 9	(605,383)	-	-	No	n/a	NoBrownfield	BrownfieldApartments
0234	3.33	Zone 9	916,829	275,324	111,418	Yes	n/a	YesMixed	MixedHousing
0238	0.31	Zone 9	319,870	1,033,581	418,268	Yes	Yes	YesGreenfield	GreenfieldHousing
0242	0.40	Zone 9	371,432	918,085	371,529	Yes	Yes	YesGreenfield	GreenfieldHousing
0261	2.69	Zone 9	618,184	229,621	92,923	Yes	n/a	YesMixed	MixedHousing
0353	0.32	Zone 8	629,789	1,952,404	790,095	Yes	Yes	YesGreenfield	GreenfieldHousing
0397	0.52	Zone 7	519,311	1,005,879	407,057	Yes	Yes	YesGreenfield	GreenfieldHousing
0400	0.31	Zone 7	315,787	1,015,317	410,877	Yes	Yes	YesGreenfield	GreenfieldHousing
0407	0.47	Zone 9	15,101	31,986	12,944	Yes	n/a	YesBrownfield	BrownfieldHousing
0452	2.45	Zone 9	1,735,392	708,302	286,634	Yes	Yes	YesGreenfield	GreenfieldHousing
0454	1.06	Zone 9	371,432	349,505	141,437	Yes	No	YesGreenfield	GreenfieldHousing
0478	0.28	Zone 7	410,346	1,485,414	601,115	Yes	n/a	YesBrownfield	BrownfieldHousing
0523	3.46	Zone 3	4,945,898	1,429,450	578,467	Yes	Yes	YesGreenfield	GreenfieldHousing
0531	7.18	Zone 3	3,781,240	526,635	213,118	Yes	Yes	YesGreenfield	GreenfieldHousing
0683	0.32	Zone 9	319,870	999,748	404,576	Yes	Yes	YesGreenfield	GreenfieldHousing
0814	0.99	Zone 7	862,134	872,462	353,066	Yes	n/a	YesBrownfield	BrownfieldHousing
0815	1.34	Zone 7	959,226	715,840	289,685	Yes	n/a	YesBrownfield	BrownfieldHousing
0950	2.17	Zone 9	992,541	457,392	185,097	Yes	Yes	YesGreenfield	GreenfieldHousing
0968	2.71	Zone 3	2,578,903	950,212	384,530	Yes	Yes	YesGreenfield	GreenfieldHousing
0983	1.35	Zone 9	453,378	335,312	135,693	Yes	No	YesGreenfield	GreenfieldHousing
0990	1.07	Zone 9	479,159	447,812	181,220	Yes	Yes	YesGreenfield	GreenfieldHousing
1004	0.79	Zone 3	315,755	399,690	161,746	Yes	n/a	YesBrownfield	BrownfieldHousing
1009	1.52	Zone 9	93,048	61,342	24,824	Yes	n/a	YesMixed	MixedHousing
1019	1.32	Zone 3	476,356	360,876	146,038	Yes	n/a	YesMixed	MixedHousing
1128	1.06	Zone 7	1,054,029	995,809	402,982	Yes	Yes	YesGreenfield	GreenfieldHousing
1137	0.84	Zone 9	198,929	237,805	96,235	Yes	n/a	YesMixed	MixedHousing
1180	2.61	Zone 7	1,420,962	544,430	220,319	Yes	n/a	YesMixed	MixedHousing
1194	1.18	Zone 7	901,386	763,225	308,860	Yes	Yes	YesGreenfield	GreenfieldHousing
1196	0.79	Zone 7	578,698	732,529	296,438	Yes	Yes	YesGreenfield	GreenfieldHousing
1197	1.09	Zone 7	994,252	912,158	369,130	Yes	Yes	YesGreenfield	GreenfieldHousing
1215	0.27	Zone 9	294,089	1,073,561	434,447	Yes	Yes	YesGreenfield	GreenfieldHousing
1216	9.60	Zone 9	743,022	77,398	31,321	Yes	n/a	YesMixed	MixedHousing
1229	16.68	Zone 9	10,171,132	609,780	246,765	Yes	Yes	YesGreenfield	GreenfieldHousing
1368	0.26	Zone 3	151,562	574,471	232,476	Yes	n/a	YesBrownfield	BrownfieldHousing
1379	1.13	Zone 3	1,181,755	1,047,251	423,799	Yes	Yes	YesGreenfield	GreenfieldHousing
1409	4.31	Zone 9	1,942,486	450,254	182,208	Yes	Yes	YesGreenfield	GreenfieldHousing
1425	3.30	Zone 7	2,259,780	684,782	277,116	Yes	n/a	YesMixed	MixedHousing
1429	2.76	Zone 3	1,550,775	561,875	227,378	Yes	n/a	YesBrownfield	BrownfieldHousing
1481	1.05	Zone 3	617,637	588,401	238,113	Yes	n/a	YesMixed	MixedHousing
1486	0.76	Zone 9	461,594	604,430	244,599	Yes	Yes	YesGreenfield	GreenfieldHousing
1487	0.34	Zone 9	371,432	1,087,452	440,068	Yes	Yes	YesGreenfield	GreenfieldHousing
1488	0.27	Zone 9	294,089	1,098,979	444,733	Yes	Yes	YesGreenfield	GreenfieldHousing
1489	0.34	Zone 9	371,432	1,092,446	442,089	Yes	Yes	YesGreenfield	GreenfieldHousing
1547	2.49	Zone 3	1,166,116	468,320	189,519	Yes	n/a	YesBrownfield	BrownfieldHousing
1590	0.59	Zone 7	434,950	735,725	297,732	Yes	Yes	YesGreenfield	GreenfieldHousing
1603	0.44	Zone 9	288,187	654,970	265,052	Yes	Yes	YesGreenfield	GreenfieldHousing
1609	0.99	Zone 9	394,179	398,160	161,127	Yes	n/a	YesMixed	MixedHousing

Our assessment shows that all but one of the sites (0164) are viable. Site 0164 is a Brownfield site that has been appraised on the basis of apartments and was unviable before the inclusion of higher costs for electric vehicle charging points. All the Greenfield sites remain viable and all but three generate land values which exceed the benchmark land value (£159,000 per acres). The three Greenfield sites that don't generate land values in excess of the benchmark (0103, 0454 and 0983) generate land values of around £140,000 per acre so they are only marginally below the benchmark. These sites did not achieve the benchmark land value prior to the inclusion of the higher costs.

With respect to the viable Brownfield/Mixed sites most of the sites generate land values that are considered reasonable, except sites 0261, 0407, 1009, 1137 and 1216 whose values are below £100,000 per acre. Such values may not be enough to persuade landowners to sell.

## Hebden Bridge Local Plan Area

Local Plan Ref	Gross Site Area (HA)	Zone	Net Residual Land Value	Value £ per ha	Value £ per acre	Viable	Minimum Land Value Benchmark Exceeded	Viability by Land Type	Viability by Land and Development Type
1501	0.65	Zone 1	1,704,075	2,621,653	1,060,926	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1503	0.43	Zone 1	1,153,318	2,682,135	1,085,401	Yes	Yes	YesGreenfield	YesGreenfieldHousing

Both sites within the Hebden Bridge Local Plan Area remain viable after the inclusion of the higher costs for the electric vehicle charging points and still generate land values that exceed £1,000,000 per acre.

### Mytholmroyd Local Plan Area

Local Plan Ref	Gross Site Area (HA)	Zone	Net Residual Land Value	Value £ per ha	Value £ per acre	Viable	Minimum Land Value Benchmark Exceeded	Viability by Land Type	Viability by Land and Development Type
0011	2.63	Zone 3	1,943,054	740,014	299,467	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0253	0.28	Zone 3	370,902	1,322,240	535,082	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0931	1.21	Zone 3	1,229,050	1,011,882	409,487	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1372	3.23	Zone 3	1,342,701	415,324	168,072	Yes	Yes	YesGreenfield	YesGreenfieldHousing

The Greenfield sites within the Mytholmroyd Local Plan area remain viable and generate land value in excess of the benchmark land value of £159,00 after the costs of the electric vehicle charging points are increased. Site 0253 despite being Brownfield also generates a land value of just over £350,000 per acre, which is more than reasonable for a Brownfield site especially in view of our cautious approach to appraising this site typology. As noted in our original report the land value for this site is high because it's a small site (the actual residual value is £380,000) and the site has capacity for only 11 dwellings meaning it falls below the threshold for providing affordable housing.

### Northowram and Shelf Local Plan Area

Local Plan Ref	Gross Site Area (HA)	Zone	Net Residual Land Value	Value £ per ha	Value £ per acre	Viable	Minimum Land Value Benchmark Exceeded	Viability by Land Type	Viability by Land and Development Type
0221	1.82	Zone 6	2,377,903	1,304,851	528,045	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0589	0.38	Zone 6	842,029	2,215,865	896,712	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0759	0.54	Zone 6	842,029	1,558,083	630,522	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0766	5.81	Zone 6	6,515,444	1,120,648	453,502	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0782	5.86	Zone 6	9,023,897	1,539,914	623,170	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1034	1.97	Zone 6	3,233,451	1,641,082	664,110	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1035	0.95	Zone 6	1,438,222	1,511,921	611,841	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1036	0.89	Zone 6	1,438,222	1,624,028	657,209	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1037	0.98	Zone 6	1,324,039	1,351,061	546,745	Yes	n/a	YesMixed	YesMixedHousing
1041	1.63	Zone 6	1,568,127	962,041	389,317	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1044	2.11	Zone 6	1,832,184	869,361	351,811	Yes	n/a	YesMixed	YesMixedHousing
1523	1.62	Zone 6	3,233,451	1,995,958	807,720	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1543	11.17	Zone 6	17,985,306	1,610,144	651,590	Yes	Yes	YesGreenfield	YesGreenfieldHousing

All the allocations that are Greenfield are viable and generate land values in excess of the benchmark land value even with the higher costs for electric vehicle charging points. The two mixed sites (1037 and 1044) also remain viable generating land values of circa £546,000 per acre (site 1037) and £351,000 per acre (site 1044).

### Ripponden Local Plan Area

Local Plan Ref	Gross Site Area (HA)	Zone	Net Residual Land Value	Value £ per ha	Value £ per acre	Viable	Minimum Land Value Benchmark Exceeded	Viability by Land Type	Viability by Land and Development Type
0938	0.53	Zone 4	1,122,398	2,114,773	855,802	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1023	1.41	Zone 4	455,892	323,328	130,844	Yes	n/a	YesBrownfield	YesBrownfieldHousing
1027	0.54	Zone 4	703,643	1,303,043	527,313	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1224	1.84	Zone 4	1,396,786	761,121	308,009	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1602	0.76	Zone 4	1,396,786	1,840,336	744,744	Yes	Yes	YesGreenfield	YesGreenfieldHousing

The Greenfield sites remain viable and generate land values in excess of the benchmark land value (i.e. £159,000per acre). The Brownfield site is also viable and generates a land value of circa £130,000 per acre. We believe this is a reasonable land value for a Brownfield site especially in view of the cautious approach we have adopted when appraising this site typology.

### Sowerby Bridge Local Plan Area

Local Plan Ref	Gross Site Area (HA)	Zone	Net Residual Land Value	Value £per ha	Value £ per acre	Viable	Minimum Land Value Benchmark Exceeded	Viability by Land Type	Viability by Land and Development Type
0044	2.95	Zone 3	3,520,004	1,191,776	482,285	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0287	0.84	Zone 3	483,453	576,341	233,232	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0435	0.30	Zone 3	672,635	2,262,063	915,407	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0438	0.63	Zone 3	625,340	984,927	398,578	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1356	1.20	Zone 3	(775,622)	-	-	No	No	NoGreenfield	NoGreenfieldApartments
1398	4.11	Zone 3	2,745,772	668,071	270,354	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1412	0.61	Zone 3	484,130	790,400	319,857	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1415	0.24	Zone 3	494,691	2,061,213	834,128	Yes	n/a	YesMixed	YesMixedHousing
1654	1.51	Zone 3	(3,913)	-	-	No	n/a	NoBrownfield	NoBrownfieldHousing
1655	1.45	Zone 3	320,663	221,736	89,732	Yes	n/a	YesBrownfield	YesBrownfieldHousing

All the Greenfield sites are viable expect site 1356 after the inclusion of higher electric vehicle charging points costs. However, site 1356 was unviable in our original report. This is because the site has been modelled based on apartments and it can be viably developed for housing even with the higher costs for electric vehicle charging points. Site 1654 becomes unviable after the inclusion of the higher costs. However, it should be noted that in our original report this site was only generating a very low land value of circa £6,000 per acre. Site 1415 remains viable and generates a land value which is almost £835,000 per acre. Site 1655 is also viable, but the land value is only around £90,000 per acre (down from circa £96,000 per acre in our original report). This may not be enough to persuade a landowner to sell.

### Todmorden Local Plan Area

Local Plan Ref	Gross Site Area (HA)	Zone	Net Residual Land Value	Value £per ha	Value £ per acre	Viable	Minimum Land Value Benchmark Exceeded	Viability by Land Type	Viability by Land and Development Type
0053	0.43	Zone 2	549,739	1,291,760	522,747	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0635	0.93	Zone 2	1,336,801	1,441,663	583,409	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0640	1.33	Zone 2	1,732,478	1,302,615	527,140	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0651	0.64	Zone 2	555,169	867,451	351,038	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0658	0.47	Zone 2	469,704	1,007,735	407,808	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0659	0.61	Zone 2	649,072	1,064,053	430,599	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0901	0.73	Zone 2	594,605	811,073	328,224	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0914	1.31	Zone 2	1,222,312	933,063	377,590	Yes	n/a	YesMixed	YesMixedHousing
1534	0.71	Zone 2	454,345	643,208	260,292	Yes	n/a	YesMixed	YesMixedHousing

All of the Greenfield sites in the Todmorden Local Plan area remain viable after the inclusion of the higher costs for the electric vehicle charging points and generate land values which are considerably higher the benchmark land value (i.e. £159,000 per acre). The Brownfield and Mixed sites also remain viable and despite our cautious approach to appraising these typologies they still generate land values which exceed the benchmark land value for unconstrained Greenfield sites.

### Conclusions

Through this sensitivity we have demonstrated that the inclusion of higher costs in relation to the provision of electric vehicle charging points, in accordance with Policy IM4, has no material impact on the viability results as presented in our original report. It should also be recognised that within our original report there is potentially an inherent viability cushion within our build costs of around £37,500 per dwelling which would more than offset any cost increases associated with Policy IM4 in additional to any other unforeseen costs at this point in time.