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# **Draft Sites for Housing Allocation – Viability Assessment**

## **Final Report**

August 2020

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## Appendices

Appendix 1 – List of Preferred Housing Allocations (August 2020)

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**Status: Final**  
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**For and on behalf of Avison Young (UK) Limited**

# 1. Introduction

- 1.1 Calderdale Council is working towards the adoption of a new Local Plan. This single plan will combine the functions of the Core Strategy and Land Allocations and Designation Plan development plan documents.
- 1.2 In 2017 Avison Young (previously trading as GVA) were appointed by the Council to consider the viability of policies set out within the Local Plan Initial Draft (July 2017) and advise on what CIL rates would be viable to include in the Draft Charging Schedule (DCS) for the purposes of CIL having taken into consideration the cumulative impact of other local plan policies. This assessment also considered the viability of the draft housing and employment allocations within the Calderdale Local Plan Initial Draft (July 2017).
- 1.3 Our report<sup>1</sup> was published in January 2018 and was used by the Council to inform the policies included within the Calderdale Local Plan Publication Draft 2018 and the CIL rates set out within the Draft Charging Schedule (August 2018).
- 1.4 However, the Calderdale Local Plan Publication Draft 2018 included additional draft housing, employment and mixed-use allocations that were not included within the Local Plan Initial Draft (2017). The Council, therefore, subsequently instructed Avison Young<sup>2</sup> to consider the viability of these additional draft allocations. This report was published in March 2019<sup>3</sup>.
- 1.5 As the Council works towards preparing for the Local Plan Examination in Public (EIP) they have instructed Avison Young to undertake a new viability assessment of the 'preferred Local Plan allocations for housing as at 21<sup>st</sup> August 2020. A list of these sites /allocations is included at Appendix 1.
- 1.6 This assessment does not consider the viability of the garden suburbs (sites LP1451 and LP1463) as a separate assessment has been undertaken for these sites<sup>4</sup>.
- 1.7 In preparing this assessment we have also taken into consideration the following policy requirements set out within the Publication Draft of the Local Plan:
- Policy SD7 (Allocated Housing Sites), which sets out the indicative capacity for each of the draft housing allocations. Note the current proposed housing allocations (as at August 2020) and their indicative capacities are those listed in Appendix 1, which supersede the allocations set out under Policy SD7 of the Calderdale Local Plan Publication Draft 2018.
  - Policy HS2 (Residential Density) which states that the Council will expect the capacities for housing allocations indicated in Policy SD7 (allocated Housing Sites) to be achieved. As outlined previously the housing allocations under Policy SD7 of the Calderdale Local Plan 2018 are to be superseded by the latest draft housing allocations, as at August 2020, which are included at Appendix 1.

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<sup>1</sup> Local Plan and Preferred Sites for Allocation Viability Assessment – January 2018 (EV61)

<sup>2</sup> Trading previously as GVA

<sup>3</sup> Local Plan and Preferred Sites for Allocation Viability Assessment – Addendum Report, March 2019 (EV61.2)

<sup>4</sup> Refer to Matter 8 Hearing Statement (HS8.1) Appendix 5

- Policy HS3 (Housing Mix) which states that the Council will seek a mix of type, size, tenure and affordability of new housing. The policy further states that proposed housing developments of 30 or more dwellings should be accompanied by a statement setting out how the mix of housing will assist in meeting local needs. The policy further states that the housing mix should be informed by the most recent SHMA together with other relevant and recent information including market factors and the location and characteristics of the site
- Policy HS4 (Housing for Independent Living) sets out the Council's requirements with respect to housing for independent living. Bullet iii of the policy states that proposals for residential development should ensure that 100% of units are adaptable and accessible homes. A footnote to the policy states that adaptable and accessible homes are those that meet Requirement M4(2) of the Building Regulations 2015, or any subsequent government standard.
- Policy HS6 (Affordable Housing) sets out the Council's requirements with respect to affordable housing. The policy also states that the Council will expect details of the affordable housing mix to be provided in a statement of Affordable Housing Contribution, which is to be informed by the most recent SHMA, together with the Council's published guidance on affordable housing provision. For the purpose of our assessment the Council has advised that 10% of the affordable requirement should be based on Starter Homes with the remaining affordable housing<sup>5</sup> based on more typical /standard affordable tenures.
- Policy IM4 (Sustainable Travel) sets out the mechanisms that the Council will seek to apply to mitigate the impacts of car use and encourage other forms of transport with lower environmental impacts. The requirements of policy IM4 that are likely to have a direct cost on development include the provision of electric vehicle charging points, provided at their parking spaces, within all new homes.
- Policy BT3 (Landscaping) requires that development proposals, where appropriate, be accompanied by landscaping schemes that include good quality hard and soft landscaping. The policy states that Landscaping schemes should ensure that new development integrates appropriately into its surroundings, contributes to the character of the area, and enhances local biodiversity if practicable. Bullet iv of the policy states that schemes should include details of how the proposals will maximise the potential for increasing net biodiversity gains on site through the creation of wildlife habitats.

1.8 It should be noted that it is not the purpose of this report to reassess the viability of the proposed policy approaches set out within the Calderdale Local Plan Publication Draft (2018). This report simply seeks to update the previous assessments of viability to reflect the latest preferred housing allocations and to take into consideration changes in market circumstances, the inclusion of Policy IM4 (not included in the previous assessments) and the change in emphasis on the affordable housing tenure<sup>6</sup>

1.9 This assessment has also considered the impact on viability of the forthcoming Changes to Part L and Part F of the Building Regulations.

1.10 However, this assessment does not consider / include the CIL charges set out within the Draft Charging Schedule. Whilst the Council is preparing for the introduction of its Community Infrastructure Levy (CIL) and has published its Draft Charging Schedule, the Council's priority is on ensuring a viable and deliverable Local Plan. The viability and the evidence which supports the charges in the Draft Charging Schedule will be re-examined later.

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<sup>5</sup> This will vary depending on which affordable housing zone the site lies within – refer to Table 3.4 on page 10.

<sup>6</sup> i.e. 10% Starter homes and 15% more traditional forms of affordable tenure

- 1.11 This report has been prepared in accordance with the RICS Professional Statement Financial Viability in Planning: Conduct, and Reporting, 1<sup>st</sup> edition, May 2019 and the latest Planning Policy guidance (PPG) and National Planning Policy Framework (NPPF) guidance relating to viability.
- 1.12 The advice contained within this report does not constitute a valuation of the sites in accordance with RICS Valuation – Global Standards 2020 and should not be relied upon as such.
- 1.13 The Royal Institution of Chartered Surveyors (RICS) also recommends that suitably qualified professionals are consulted in undertaking viability assessments to inform the planning process. Avison Young is a company regulated by the RICS and this assessment has been undertaken by Dale Robinson, MRICS, a Chartered Planning and Development Surveyor and Registered Valuer. He was responsible for undertaking the original 2018 assessment and subsequent viability addendum.

## 2. Methodology

2.1 There is no standard answer to questions of viability, nor is there a single approach for assessing viability.

2.2 For the purpose of this assessment we have referred to guidance issued by the Royal Institution of Chartered Surveyors (RICS) and the latest Planning Policy Guidance (PPG) and National Planning Policy Framework (NPPF) guidance relating to viability. In the first instance we have referred to the 'RICS Professional Statement Financial Viability in Planning: Conduct, and Reporting, 1<sup>st</sup> edition, May 2019. The Guidance provides recommended good practice when assessing financial viability for planning purposes and is grounded in the statutory and regulatory planning regime that currently operates in England.

2.3 Financial viability for planning purposes is defined as:

*'An objective financial viability test of the ability of a development project to meet its costs, including the cost of planning obligations, while ensuring an appropriate site value for the landowner and a market risk adjusted return to the developer in delivering that project'.*

2.4 An accepted method of valuation of development land is the 'residual method'. This is explained further in the RICS Valuation Information Paper (VIP) 12. In summary this valuation approach recognises that the value of a development scheme is a function of several elements. These include:

- The value of the completed development (GDV<sup>7</sup>);
- The direct costs of developing the scheme (TCC<sup>8</sup>);
- The return (profit) to the developer for taking the development risk and delivering the scheme;
- The cost of any planning obligations; and
- The cost or value of the land.

2.5 Normally the residual method of valuation is used in two basic ways. In the first instance it can be used to assess the level of return (profit) generated from the proposed project where the cost of the land is an input into the appraisal. In the second option it can be used to establish a 'residual site value' by inputting a predetermined level of profit. The consequential outputs of both options can then be compared to a benchmark to assess the viability of the scheme.

2.6 This assessment is based on the second option in which we seek to establish a 'residual site value' for each allocation. This can be expressed through the following simple calculation.

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***Gross Development Value (GDV) (minus) Total Costs (including Developers Profit) = Residual Site Value***

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<sup>7</sup> Gross Development Value

<sup>8</sup> Total Construction Costs

- Gross Development Value includes all sales income generated by the development, including income from affordable housing.
- Total Development Costs include construction costs, professional fees, planning/S106, finance / interest charges etc.
- Developer's profit is expressed by reference to a percentage of the Total Development Costs or Gross Development Value. It can also be expressed by reference to an Internal Rate of Return (IRR)<sup>9</sup> or Return on Capital Employed (ROCE)<sup>10</sup>.

2.7 This replicates the methodology applied within our previous assessments.

2.8 In simple terms; only when the development value exceeds the total project costs and required returns (profit) can a scheme be considered viable. A scheme will not proceed where development costs exceed revenue (i.e. where there is a negative land value). However, even in circumstances where a very modest land value is generated it is not likely to be construed as viable, as it is unlikely to be enough to encourage a landowner to willingly release land for development.

2.9 In terms of the process, land value is a key component of a development appraisal, albeit (as explained previously) it can often be the 'outcome' of the appraisal rather than being a fixed figure (hence why appraisals are often referred to as being 'residual', because once all the inputs are included the 'residue' (if there is any) is the amount that the developer can afford to pay for the site.

2.10 However, the 'residue' from the appraisal (as a land value) does not always meet the expectations of the landowner. If a developer is only able to pay a significantly reduced sum below the landowners' expectations, then the outcome is straight forward. The land will not be sold / released for development. Therefore, when undertaking a viability assessment, a minimum land value (aka benchmark land value) needs to be identified.

### **Benchmark Land Value.**

2.11 Para 013 (Reference ID: 10-013-20190509), of the PPG provides guidance on the issue of benchmark land values and states that a benchmark land value should be established 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 return at which it is considered a reasonable landowner would be willing to sell their land. The premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to comply with policy requirements. Landowners and site purchasers should consider policy requirements when agreeing land transactions. This approach is often called 'Existing Use Value plus (EUV+).

2.12 In determining the benchmark land value the PPG states at Para 014 (Ref ID: 10-014-20190509) what factors should be considered when establishing the benchmark land value. It states that the benchmark land value should:

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<sup>9</sup> Internal Rate of Return (IRR) is the interest rate at which the net present value of all the cash flows (both positive and negative) from a project or investment equal zero. Internal rate of return is used to evaluate the attractiveness of a project or investment. If the IRR of a new project exceeds a company's required rate of return, that project is desirable. If the IRR falls below the required rate of return, the project is normally rejected.

<sup>10</sup> Return on Capital Employed (ROCE) is a financial ratio that measures a company's profitability and the efficiency with which its capital is employed.

- Be based upon Existing Use Value (EUV);
- Allow for a premium to landowners (including equity resulting from those building their own homes);
- Reflect the implications of abnormal costs; site-specific infrastructure costs; and professional site fees; and
- Be informed by market evidence including current uses, costs and values. Where recent market evidence is used to inform assessment of benchmark land value this evidence should be based on developments which are compliant with policies, including for affordable housing. Where this evidence is not available plan makers and applicants should identify and evidence any adjustments to reflect the cost of policy compliance. This is so that historic benchmark land values of non-policy compliant developments are not used to inflate values over time.

2.13 PPG defines Existing Use Value at Para 015 (Reference ID: 10 - 015-20180724). It states that Existing Use Value (EUV) is the first component of calculating benchmark land value. It goes on to state that EUV is the value of the land in its existing use, which will vary depending on the type of site and development types. Para 015 of PPG is also clear in that Existing Use Value is not the price paid for the land and should also disregard hope value.

2.14 The premium (or the 'plus' in EUV+) is the second component of benchmark land value. It is the amount above existing use value (EUV) that goes to the landowner. Para 016 of PPG (Ref: 10-016-20190509) states that the premium should provide a reasonable incentive for a landowner to bring forward land for development while allowing a contribution to fully comply with policy requirements. Para 016 states that the process for establishing the premium will be an iterative process informed by professional judgement and must be based upon the best available evidence informed by cross sector collaboration. Market evidence can include benchmark land values from other viability assessments. Land transactions can be used but only as a cross check to the other evidence. Any data used should reasonably identify any adjustments necessary to reflect the cost of policy compliance (including for affordable housing), or differences in the quality of land, site scale, market performance of different building use types and reasonable expectations of local landowners. PPG states that policy compliance means that the development complies fully with up to date plan policies including any policy requirements for contributions towards affordable housing requirements at the relevant levels set out in the plan. PPG also confirms that a decision maker can give appropriate weight to emerging policies.

2.15 We have assumed the following land value benchmarks within our assessment

### **Benchmark Land Values for Greenfield Sites**

2.16 Like in our previous assessments we have assumed that the majority of these will be agricultural land or Greenfield in nature such as former gardens, grassed areas etc. On this basis we have applied a benchmark which reflects agricultural uses. In the current market a value of £8,500 per gross acre may be achievable. When assessing a suitable premium over and above the EUV the previous assessments referred to guidance issued by the HCA, (now trading as Homes England) which specified that for agricultural land premiums were typically in the range of 10 to 20 times the current use value. For the purpose of this assessment, replicating the approach adopted in the previous assessments we have applied a median uplift of 15 times EUV which results in a land value of £127,500 per acre. Also replicating the approach used within the previous assessment

we have applied a viability cushion of 25% which increases the minimum land value benchmark to £159,375 per acre (say £159,000 per acre).

### **Benchmark Land Values for Brownfield Sites**

2.17 In terms of the Brownfield sites it is difficult to establish what an appropriate minimum benchmark land value should be as the value will be influenced by the extent of the abnormal costs. For the purpose of this assessment we have made a judgement, based on our professional opinion, on whether the residual site values resulting from our assessment will provide an incentive to persuade the landowner to sell / release land for development.

### 3. Appraisal Assumptions

- 3.1 Assessing viability requires judgements which are informed by the relevant available information /evidence. It requires a realistic understanding of the costs and the value of development in the local area and an understanding of the operation of the market.
- 3.2 The development cost and value assumptions applied within our appraisals are set out below. However, even at this stage, it must be recognised that whilst our assumptions will generally align with normal or usual figures expected in the majority of developments they may differ, in some cases, from the figures that may be used in actual development schemes.

#### Number of Dwellings

- 3.3 Policy SD7 (Allocated Housing Sites) of the Calderdale Local Plan Publication Draft 2018 sets out the indicative capacity for each of the draft housing allocations. However, these allocations have been superseded by those listed in Appendix 1, which are latest housing allocations as at August 2020. Policy HS2 (Residential Density) of the Publication Draft also states that the Council will expect the capacities for housing allocations indicated in Policy SD7 (Allocated Housing Sites) to be achieved. The indicative capacities for the latest housing allocations, as at August 2020, are also provided at Appendix 1. We have used these capacities within this assessment.

#### Density and Dwelling Types / Housing Mix

- 3.4 The list of allocations included at Appendix 1 provides the indicative developments areas and capacities for each site. These parameters have been used to derive indicative densities for each site. Based on these densities we have then assumed hypothetical forms of development as summarised in the table below.

Table 3.1 – Development Assumptions

Net Density	Development Type
<50 dwellings per hectare	<b>Housing:</b> typically consisting of 2/3/4 bed semi-detached / detached housing and short terraces of housing with gardens and in-curtilage parking (upper end of suburban density)
>50 but less than 75 dwellings per hectare	<b>Housing:</b> typically consisting of 2/3/4 bed terraces, courtyard and mews houses.
>75 dwellings per hectare	<b>Apartments:</b> Consisting of 1/2/3 bed apartments

Source; Avison Young

- 3.5 In terms of housing mix Policy HS3 of the Publication Draft states that the Council will seek a mix of type, size, tenure and affordability of new housing. The policy further states that proposed housing developments of 30 or more dwellings should be accompanied by a statement setting out how the mix of housing will assist in meeting local needs. The policy also states that the housing mix should be informed by the most recent SHMA together with other relevant and recent information including market factors and the location and characteristics of the site.

- 3.6 The Council's Strategic Housing Market Assessment (2018) suggests that around 17% of the households to form in Calderdale will require one bed dwellings, 36% will require two bed dwellings, 33% three bed dwellings and 14% will require four plus beds.
- 3.7 In exercises such as this it is difficult to identify an appropriate mix that is suitable for every site. Because we have not been provided with a mix / schedule of proposed housing for each site, we have made the following high-level assumptions, as detailed below, for the purpose of this assessment.

Table 3.2 – Housing Mix

	Housing	Apartments
Average unit size	92.9sq.m (1,000sq.ft)	85sq.m (912sq.ft)
Gross to Net	100%	85%

Source: Avison Young

### Affordable Housing

- 3.8 In accordance with Policy HS6 of the Publication Draft, we have applied affordable housing as summarised in Table 3.3.

Table 3.3 - Affordable Housing

Zone	Housing Market Locations <sup>11</sup>	Threshold	Proportion of Affordable Housing
Zone A	Hebden Bridge, Charlestown, Ripponden, Rishworth, Barkisland	>10	35%
Zone B	Northowram, Shelf, Norwood Green, Halifax Town Centre, Skircoat, Lightcliffe (part)	>10	30%
Zone C	Todmorden, Walsden, Cornholme, Mytholmroyd, Sowerby Bridge, Illingworth, Luddendenfoot, Luddenden, Bradshaw, Brighouse, Rastrick, Clifton, Southowram, Hipperholme, Bailiff Bridge, Lightcliffe (part)	15+	25%
Zone D	Elland, Greetland, Holywell Green, Stainland, Wheatley, Ovenden, Mixenden, Boothtown, West Halifax	15+	20%

Source: Calderdale Local Plan Publication Draft (2018)

- 3.9 The policy states that the Council will expect details of the affordable housing mix to be provided in a statement of Affordable Housing Contribution, which is to be informed by the most recent SHMA, together with the Council's published guidance on affordable housing provision.
- 3.10 Within this context and for the purpose of our assessment the Council has advised that 10% of the affordable requirement should be based on Starter Homes with the remainder based on more typical /standard affordable tenures.

<sup>11</sup> Refer to Figure 1 at Section 3.42

3.11 Within this context the following tenure breakdown has been incorporated within this assessment.

Table 3.4 - Affordable Housing Tenure

AH Zone	Overall AH Requirement (%)	% of Overall Requirement as Starter Homes	% of Overall Requirement as more typical AH tenures
A	35	30	70
B	30	33	67
C	25	40	60
D	20	50	50

Source: Calderdale Council

### Construction Costs.

3.12 For the purpose of this assessment we have applied the lower quartile cost data from BCIS, rebased to the third quarter 2020 and adjusted to reflect local sensitivities in Calderdale. On this basis the costs included within this assessment are £975psm (£91psf) for estate housing and £1,253psm (£116psf) for apartments.

3.13 These costs reflect compliance with Part L 2010 Building Regulations and include allowances for:

- Developer on costs including preliminaries, site set up costs etc.
- Standard development costs – sub structures; and
- Standard developer costs - superstructures

### External Works

3.14 Because the data from BCIS excludes costs associated with external works<sup>12</sup> an additional allowance has been included for these items at 15% of the construction costs for housing and 10% for apartments (these assumptions mirror those included within our previous assessments).

### Accessible and Adaptable Homes (Lifetime Homes)

3.15 Policy HS4 of the Calderdale Local Plan Publication Draft 2018 sets out the Councils requirements with respect to housing for independent living. Bullet iii of the policy states that proposals for residential development should ensure that 100% of units are adaptable and accessible homes. A footnote to the policy states that adaptable and accessible homes are those that meet Requirement M4(2) of the Building Regulations 2015, or any subsequent government standard.

3.16 A study undertaken by EC Harris (on behalf of Department for Communities and Local Government) in September 2014 examined the cost impacts of the Accessible and Adaptable Standards. The study concluded that the cost of providing Category 2 – Accessible and Adaptable housing would cost an additional (extra over industry practice) of between £578<sup>13</sup> and £866<sup>14</sup> per house type and for apartments it would cost an average of £289 per property.

<sup>12</sup> Whilst these works are likely to vary from site to site, they would typically include all works associated with the exterior works of a project, ranging from ducts and drainage to general landscaping, parking, paving and perimeter boundaries etc.

<sup>13</sup> For an additional 2sq.m on a 2 bed terrace house

<sup>14</sup> For an additional 3sq.m on a 3 bed semi-detached and 4 bed detached property.

3.17 For the purpose of our assessment we have applied an average cost of £289 per apartment and £722 per dwelling for the housing.

3.18 These costs have only been applied to the private dwellings as there will be limited opportunity to offset the access related space costs, through additional revenue, for the affordable housing. Therefore, the costs for the affordable dwellings have been included in full meaning the overall costs for achieving M42 accessible standards on the affordable dwellings are £722 per apartment and £1,805 per house.

### **Net Biodiversity Gains**

3.19 Policy BT3 of the Calderdale Local Plan Publication Draft 2018 requires that development proposals, where appropriate, be accompanied by landscaping schemes that include good quality hard and soft landscaping. The policy states that Landscaping schemes should ensure that new development integrates appropriately into its surroundings, contributes to the character of the area, and enhances local biodiversity if practicable. Bullet iv of the policy states that schemes should include details of how the proposals will maximise the potential for increasing net biodiversity gains on site through the creation of wildlife habitats.

3.20 For the purpose of our assessment we have included a cost of £207 per dwelling for achieving the net biodiversity gains. This is based on the proportional cost of complying with this policy on another site elsewhere in the Borough.

### **Electric Car Charging Points**

3.21 Policy IM4 (Sustainable Travel) sets out the mechanisms that the Council will seek to apply to mitigate the impacts of car use and encourage other forms of transport with lower environmental impacts. The requirements of Policy IM4 that are likely to have a direct cost on development include the provision of electric vehicle charging points, provided at their parking spaces, within all new homes.

3.22 The costs of installing residential charging points are estimated to be in the region of £100 for 1 charging point. For the purpose of this assessment we have assumed 1 charging point per dwelling.

### **Remediation Costs [Brownfield Sites]**

3.23 In exercises such as this it is very difficult to make allowances for such costs, which are invariably subject to intrusive / detailed ground investigations etc. For the purpose of this assessment we have referred to guidance issued by the Homes and Communities Agency (now trading as Homes England) on dereliction, demolition and remediation costs (March 2015).

3.24 Replicating our approach within the previous assessments it is assumed that most Brownfield sites will fall under Category A, which comprise small scale and general industrial sites, colliery or mine spoil heaps, miscellaneous factories and works (not heavy industry) and sites with very small to small fuel tanks<sup>15</sup>. The assessment makes a second assumption that all Brownfield sites fall within the low water risk category.

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<sup>15</sup> Other categories include; Category B, which includes garages, workshops, pithead sites, railway lines, textiles, small scale timber treatment, sewage works, smaller chemical works, sites with small to mid-sized fuel tanks; Category C, which includes metal workings, scrap yards and shipyards, paints and solvents, small gasworks/gas holder sites, smaller power stations, rail depots (maintenance and refuelling) and site with large fuel tanks; and Category D, which includes major gasworks, iron and steel works, large chemical works, refineries and major fuel depots, ship breaking and building, larger power stations and sites with large tank farms.

3.25 Based on these assumptions the remediation costs are:

- Flats / apartments with limited soft landscaping– between £50,000 and £130,000 per hectare; and
- Residential with private gardens – between £75,000 and £205,000 per ha.

3.26 The median costs have been adopted and a locational factor of 0.86 applied, as per the rates set out within the guidance. On this basis the costs set out within Table 3.5 have been incorporated into our assessment.

Table 3.5 – Remediation Costs (Brownfield Sites)

Description	Median Cost £per ha	Location Factor	Cost £per ha
Flats / Apartments	£90,000	0.86	£77,400
Residential with private gardens	£140,000	0.86	£120,400
Mixed Housing and Apartments	-	-	£98,900 <sup>16</sup>

Source: Homes and Communities Agency - Dereliction, demolition and remediation costs (March 2015).

3.27 Our assessment has assumed a worst-case scenario and applied these costs to the full developable area of all Brownfield sites. However, the reality is likely to be very different and not all the sites will be contaminated, and some may only have contamination present in limited areas across the site.

3.28 Some of the draft allocations also comprise a mixture of Greenfield and Brownfield land. For the purpose of this assessment we have assumed that the remediation costs for these sites will be half of the costs identified in Table 3.4.

### Site Preparation [Brownfield Sites]

3.29 It is also assumed that a proportion of the Brownfield sites will require an element of site preparation and demolition to facilitate their redevelopment. Assuming complex sites, the guidance published by the HCA states that costs range between £15psm and £75psm of site area.

3.30 Assuming the median cost of £45psm and after adjusting for location factors the overall cost for site preparation is £39psm or £390,000 per ha. Once again, our assessment has assumed a worst-case scenario and applied these costs to the full developable area of all Brownfield sites.

3.31 For mixed Greenfield and Brownfield sites we have a cost of £195,000 per hectare.

### Professional Fees.

3.32 Many viability studies incorporate an assessment of fees based upon a percentage of the base construction costs. Figures for fees relating to design, planning and other professional fees can range between 5% and 10%. Mirroring the assumptions used within the previous assessments project fees have been included at a rate of 8% for small developments (i.e. less than 50 dwellings) and 5% for larger sites (i.e. those greater than 50 dwellings).

<sup>16</sup> The average cost of apartments and housing

## Contingency

- 3.32 Contingencies are an allowance for unexpected development costs. Replicating the assumptions used in our previous assessment's contingencies have been included at 3% for Greenfield sites and 5% for the Brownfield sites.

## S106 and S278 Contributions

- 3.33 S106 and S278 (highway contributions) are normally scheme specific and therefore can't be captured in area wide viability assessments which by their very nature are based on hypothetical schemes. To avoid any misplaced assumptions that might prejudice the results the previous assessments did not include an allowance for these costs. This position remains unchanged. Instead within our previous assessments, we applied a viability cushion of 10% to the residual land to take matters such as this into account. However, as outlined previously we have already applied a viability cushion of 25% to the benchmark land value and with hindsight applying a further cushion is being overly cautious and equally may prejudice the results of our assessment.
- 3.34 The Council are also considering an education roof tax for allocations within the Brighouse Local Plan area. The cost of this tariff is currently estimated to be £9,020.79 per dwelling but could be reduced to £4,460 if the Multi Trinity Academy is successful in their application to the DfE for funding for a new free School for 11 to 16 year olds. We have included the education tariff of £9,020.70 per dwelling within our assessment but only applied this to the allocations within the Brighouse Local Plan Area.

## Marketing, Agents and Legal fees.

- 3.35 We have included 1% of GDV for agent's fees and £1,000 per dwelling for legal fees. Further to these allowances we have also included marketing / promotion costs at 2% of GDV.

## Financing

- 3.36 It is difficult to establish what the appropriate rate of interest would be in the current market. Current margins are substantial despite the current Bank of England base rate being 0.1%. It is also widely recognised that the approach to development varies widely and is influenced by the equity invested in the site along with the financial organisation / strength of the developer. The interest rates can therefore differ widely between these approaches.
- 3.37 For the purpose of our appraisal we assumed 100% debt funding at a rate of 6.25%.

## Profit.

- 3.38 Para 018 of PPG (Ref: ID-018-20190509) states that for the purpose of plan making an assumption of 15% to 20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies. It goes on to state that plan makers may choose to apply alternative figures where there is evidence to support this according to the type, scale and risk profile of planned development. It further states that a lower figure may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces risk.
- 3.39 For the purpose of our assessment we have applied a blended return of 20% of GDV.

## Stamp Duty and Purchasers Costs on Residual Land Value

- 3.40 We have assumed stamp duty at the prevailing rate prior to the short-term concessions granted in response to the Covid 19 pandemic. These are set out in Table 3.6.

Table 3.6 - Stamp Duty Thresholds for Non-Residential Land or Property<sup>17</sup>

Purchase Price	SDLT Rate
Up to £150,000	0%
The next £100,000 (the portion from £150,001 to £250,000)	2%
The remaining amount (the portion over £250,000)	5%

Source: HM Customs and Revenue

- 3.41 In addition to the stamp duty rates an extra allowance of 1.75% has been applied to cover the agents', legal fees and VAT associated with the transaction.

## Value Assumptions

- 3.42 It is accepted that different sale values will apply in various locations across the Borough. This fact was recognised in our previous assessments which divided the Borough into a series of submarket locations categorised by their main settlements (refer to Figure 1).
- 3.43 The 'market sales Values, relative to each zone that have been incorporated within our assessment are summarised in Table 3.7.

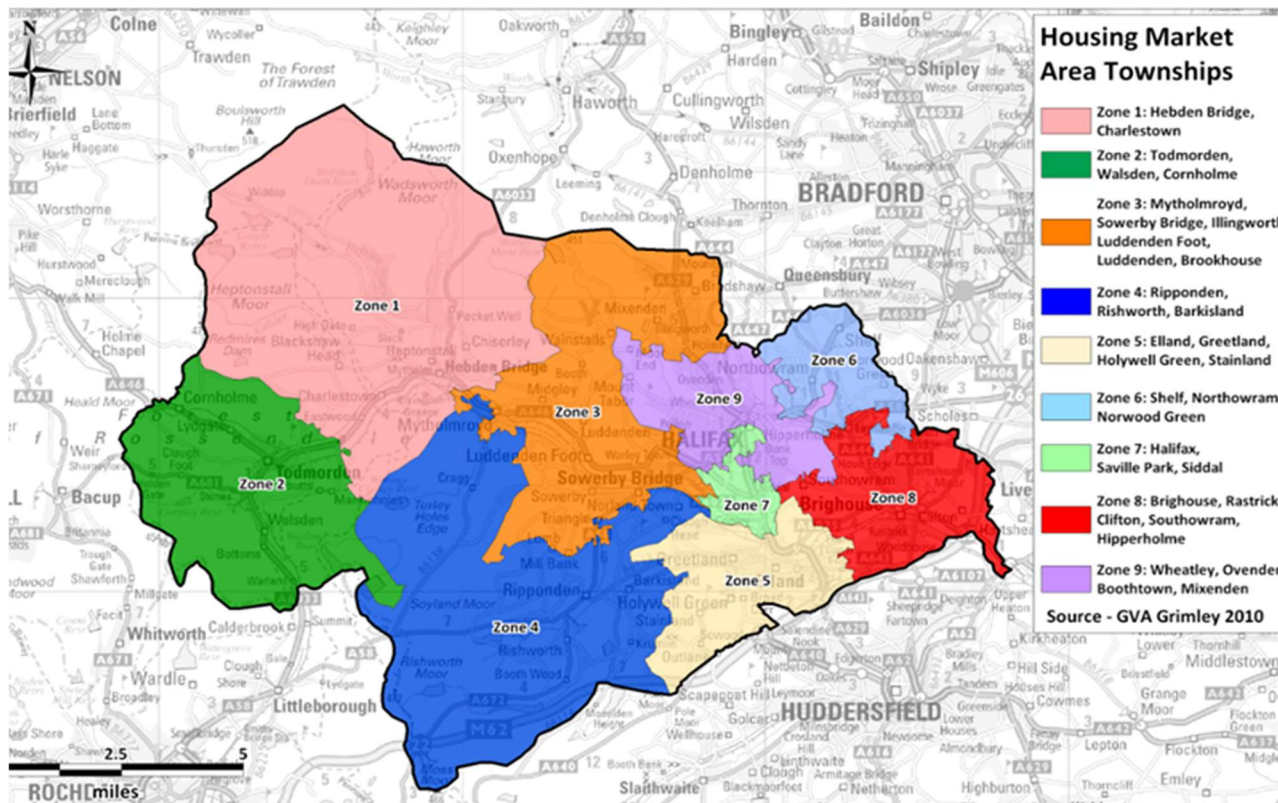
Table 3.7 – Market Sales Values

Market Zone	Houses	Apartments
Zone 1	£300psf	£285psf
Zone 2	£235psf	£215psf
Zone 3	£225psf	£215psf
Zone 4	£300psf	£285psf
Zone 5	£230psf	£230psf
Zone 6	£275psf	£225psf
Zone 7	£230psf	£225psf
Zone 8	£255psf	£195psf
Zone 9	£195psf	£230psf

- 3.44 The Starter Homes have been valued at 80% of the market dwellings and for the affordable housing, we have applied the transfer value of £800psm (£74psf) set out within the Council's Affordable Housing Supporting Guidance Document (August 2018).

<sup>17</sup> The HMRC Guidance states that non – residential properties include commercial property such as shops or offices, agricultural land, forests, and any other land or property transaction which is not used as a dwelling and six or more residential properties bought in a single transaction.

Figure 1 - Housing Market Area Townships



Source: Calderdale Council

## 4. Appraisal Results

4.1 Within this section of the report we outline the results from our assessment which are inclusive of the policy requirements set out within the Calderdale Local Plan Publication Draft 2018, including:

- Policy SD7 (Allocated Housing Sites),
- Policy HS2 (Residential Density)
- Policy HS3 (Housing Mix)
- Policy HS4 (Housing for Independent Living)
- Policy HS6 (Affordable Housing)
- Policy IM4 (Sustainable Travel); and
- Policy BT3 (Landscaping)

### Brighouse Local Plan Area

4.2 The results of our assessment, set out within Table 4.1, show that almost all the allocations are viable. Only two sites (0571 and 1322) are unviable. It's notable that these are the only sites which are likely to be brought forward for apartments and happen to be a Greenfield (site 1322) and Mixed site (0571). All the sites that are 'Greenfield' and viable generate land values that are in excess of the benchmark land value (i.e. £159,000 per acre).

4.3 We have not set a benchmark land value for Brownfield/Mixed sites<sup>18</sup> as it is difficult to establish what an appropriate minimum benchmark land value should, which will be invariably influenced by the extent of the abnormal costs. Instead we have formed an opinion on whether the Net Residual Land Value from our assessments is enough to persuade the landowners to release the site for development. All of the Brownfield / Mixed housing sites are viable and also generate land values that are construed to be reasonable for the landowner. The notable exception to this is site 0174 which generates a land value of £16,418 per acre. If affordable housing is excluded sites 0571 and 1322 remain unviable. The land value on site 0174 increases but is still very low at £62,978 per acre. However, it should be noted that this site has an average net density of 8 dwelling per hectare which will always impact on the ability to generate a reasonable land value.

4.4 In view of the fact that traditional housing is viable on Greenfield, Brownfield and Mixed sites within the Brighouse Local Plan Area this would suggest that the viability issues associated with sites 0571 and 1322 relates to them being developed for apartments. On this basis sites 0571 and 1322 could be viably brought forward for housing.

### Elland Local Plan Area

4.5 All of the allocations are viable, and the Greenfield sites generate land values in excess of the benchmark land value. There is one mixed Greenfield/Brownfield site (1283) and this generates a land value of more than £380,000 per acre which is considered more than reasonable for the landowner. The results of the assessment for the Elland Local Plan Area are presented in Table 4.2.

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<sup>18</sup> This is why the minimum land value benchmark exceeded is shown as n/a for the brownfield / mixed use sites.

### Halifax Local Plan Area

- 4.6 The results of our assessment in relation to the Halifax Local Plan area are set out within Table 4.3. The results show 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,
- 4.7 All of the Greenfield sites are 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 £145,000 per acre so they are only marginally below the benchmark.
- 4.8 With respect to the viable Brownfield/Mixed sites most of the sites generate land values that are considered reasonable, except sites 0407, 1009 and 1216 whose values are below £100,000 per acre. However, at this stage it should not be forgotten that the assessment has taken a very cautious approach with respect to the Brownfield/Mixed sites assuming that all sites will require remediation and site preparation as well as applying the costs to 100% of the developable area. If affordable housing is excluded the land values for these sites increases to £146,000 per acre (site 0407), £152,000 per acre (1009) and circa £78,000 per acre (site 1216). These values are reasonable for sites 0407 and 1009 but low for site 1216.
- 4.9 If affordable housing is excluded 1064 remains unviable. It should be noted that this site has been modelled based on apartments and our assessment has demonstrated that it is viable to deliver housing on Brownfield / Mixed sites despite our conservative assumptions with respect to these site typologies. On this basis it is likely that this site could also be delivered for housing rather than apartments.

### Hebden Bridge Local Plan Area

- 4.10 There are only two sites within the Hebden Bridge Local Plan Area (1501 and 1503) both are Greenfield. The sites are viable and generate land values which significantly exceed the benchmark land value of £159,000 per acre. Our results are presented in Table 4.4.

### Mytholmroyd Local Plan Area

- 4.11 There are four sites within the Mytholmroyd Local Plan Area. Three are Greenfield and one is Brownfield. The Greenfield sites are all viable and generate land value in excess of the benchmark land value of £159,000. Site 0253 is Brownfield and despite being Brownfield generates a land value of almost £550,000 per acre, which is more than reasonable for a Brownfield site especially in view of our cautious approach to appraising this site typology. It should be noted that the land value 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. The results of our assessment are shown in Table 4.5.

### Northowram and Shelf Local Plan Area

- 4.12 All of the allocations that are Greenfield sites are viable and generate land values in excess of the benchmark land value. There are two Mixed sites (1037 and 1044) and both of these sites are also viable generating land values of circa £560,000 per acre (site 1037) and £360,000 per acre (site 1044). The results of our assessment are shown in Table 4.6.

### **Ripponden Local Plan Area**

- 4.13 There are five sites within the Ripponden Local Plan area. Four of the sites are Greenfield and one is Brownfield. The Greenfield sites are all viable and generate land values in excess of the benchmark land value.
- 4.14 The Brownfield site is also viable and generates a land value of circa £135,000 per acre. 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.
- 4.15 The results of our assessments with respect to the sites within the Ripponden Local Plan area are shown in Table 4.7.

### **Sowerby Bridge Local Plan Area**

- 4.16 There are nine Greenfield sites within the Sowerby Bridge Local Plan Area. All of these sites are viable except site 1356 which has been appraised assuming it's developed for apartments. The remaining Greenfield sites all generate land values that are in excess of the minimum benchmark land value. On this basis it is likely that site 1356 would be viable for housing rather than apartments.
- 4.17 In addition there are two Brownfield sites and one Mixed site. All of these sites are viable but the Brownfield sites (1654 and 1655) generate land values that fall below £100,000 per acre. If affordable housing is excluded the land values increase to circa £175,000 and £240,000 per acre respectively, which are considered reasonable land values especially given the cautious approach we have taken to appraising Brownfield sites within this assessment.
- 4.18 The results of our assessments for the sites within the Sowerby Bridge Local Plan area are set out in Table 4.8.

### **Todmorden Local Plan Area**

- 4.19 There are five Greenfield sites within the Todmorden Local Plan Area. All these sites are viable and generate land values in excess of the benchmark land value (i.e. £159,000 per acre).
- 4.20 There are also two Brownfield and two Mixed sites. All are viable and the Brownfield sites (0053 and 0658) generate land values of £530,000 per acre and £425,000 per acre respectively. The Mixed sites (0914 and 1534) generate land values of circa £390,000 per acre and £270,000 per acre respectively. All these values are reasonable.
- 4.21 Table 4.9 sets out the results of our assessments with respect to the Todmorden Local Plan Area.

Table 4.1 - Brighouse Local Plan Area Results

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	114,815	40,714	16,476	Yes	n/a	YesMixed	YesMixedHousing
0338	0.60	Zone 8	773,401	1,289,002	521,631	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0548	0.55	Zone 8	664,864	1,208,844	489,193	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0565	0.52	Zone 8	620,018	1,192,342	482,515	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0568	4.34	Zone 8	3,204,268	738,311	298,778	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0571	0.48	Zone 8	(3,467,493)	-	-	No	n/a	NoMixed	NoMixedApartments
0846	0.30	Zone 8	570,397	1,901,323	769,424	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0945	1.82	Zone 8	2,095,437	1,151,339	465,922	Yes	n/a	YesBrownfield	YesBrownfieldHousing
1000	0.54	Zone 8	895,305	1,657,972	670,945	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1032	1.65	Zone 8	1,542,986	935,143	378,432	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1033	3.22	Zone 8	4,099,273	1,273,066	515,182	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1053	3.73	Zone 8	2,853,329	764,967	309,566	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1054	1.23	Zone 8	1,222,487	993,892	402,206	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1060	0.64	Zone 8	834,353	1,303,676	527,569	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1077	13.02	Zone 8	6,047,097	464,447	187,951	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1078	10.62	Zone 8	11,093,696	1,044,604	422,728	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1093	1.23	Zone 8	826,402	671,871	271,892	Yes	n/a	YesBrownfield	YesBrownfieldHousing
1095	4.83	Zone 8	6,239,056	1,291,730	522,735	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1116	1.83	Zone 8	2,022,311	1,105,088	447,205	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1322	0.48	Zone 8	(2,438,200)	-	-	No	No	NoGreenfield	NoGreenfieldApartments
1469	0.44	Zone 8	780,084	1,753,502	709,604	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1468	0.85	Zone 8	681,452	801,708	324,434	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0771	0.61	Zone 8	1,228,062	2,013,216	814,704	Yes	n/a	YesBrownfield	YesBrownfieldHousing

Table 4.2 – Elland Local Plan Area Results

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	2,812,173	1,258,647	509,347	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0037	0.95	Zone 5	1,142,946	1,201,560	486,245	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0065	1.01	Zone 5	891,721	882,892	357,287	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0146	0.86	Zone 5	1,194,644	1,390,767	562,813	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0177	9.87	Zone 5	8,168,340	827,832	335,005	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0952	10.63	Zone 5	10,805,816	1,016,341	411,291	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0964	0.63	Zone 5	617,634	980,371	396,735	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0978	8.28	Zone 5	10,098,335	1,219,880	493,659	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1030	0.54	Zone 5	734,267	1,355,554	548,563	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1283	0.51	Zone 5	483,297	947,640	383,489	Yes	n/a	YesMixed	YesMixedHousing
1407	0.44	Zone 5	669,331	1,525,377	617,287	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1567	20.53	Zone 5	18,365,640	894,697	362,064	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1616	2.19	Zone 5	1,794,515	818,639	331,285	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1625	1.01	Zone 5	1,142,946	1,130,933	457,664	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1657	0.76	Zone 5	1,142,946	1,499,687	606,890	Yes	Yes	YesGreenfield	YesGreenfieldHousing

Table 4.3 – Halifax Local Plan Area Results

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	728,539	976,682	395,242	Yes	Yes	YesGreenfield	GreenfieldHousing
0103	1.25	Zone 9	451,278	362,255	146,596	Yes	No	YesGreenfield	GreenfieldHousing
0164	0.38	Zone 9	(575,074)	-	-	No	n/a	NoBrownfield	BrownfieldApartments
0234	3.33	Zone 9	996,132	299,139	121,055	Yes	n/a	YesMixed	MixedHousing
0238	0.31	Zone 9	329,669	1,065,244	431,081	Yes	Yes	YesGreenfield	GreenfieldHousing
0242	0.40	Zone 9	382,864	946,343	382,964	Yes	Yes	YesGreenfield	GreenfieldHousing
0261	2.69	Zone 9	680,494	252,766	102,289	Yes	n/a	YesMixed	MixedHousing
0353	0.32	Zone 8	637,138	1,975,187	799,315	Yes	Yes	YesGreenfield	GreenfieldHousing
0397	0.52	Zone 7	527,477	1,021,696	413,458	Yes	Yes	YesGreenfield	GreenfieldHousing
0400	0.31	Zone 7	320,686	1,031,070	417,251	Yes	Yes	YesGreenfield	GreenfieldHousing
0407	0.47	Zone 9	29,114	61,670	24,957	Yes	n/a	YesBrownfield	BrownfieldHousing
0452	2.45	Zone 9	1,813,253	740,082	299,495	Yes	Yes	YesGreenfield	GreenfieldHousing
0454	1.06	Zone 9	382,864	360,262	145,790	Yes	No	YesGreenfield	GreenfieldHousing
0478	0.28	Zone 7	419,490	1,518,515	614,510	Yes	n/a	YesBrownfield	BrownfieldHousing
0523	3.46	Zone 3	5,071,430	1,465,731	593,149	Yes	Yes	YesGreenfield	GreenfieldHousing
0531	7.18	Zone 3	3,878,170	540,135	218,581	Yes	Yes	YesGreenfield	GreenfieldHousing
0683	0.32	Zone 9	329,669	1,030,375	416,970	Yes	Yes	YesGreenfield	GreenfieldHousing
0814	0.99	Zone 7	904,214	915,045	370,299	Yes	n/a	YesBrownfield	BrownfieldHousing
0815	1.34	Zone 7	1,009,397	753,282	304,837	Yes	n/a	YesBrownfield	BrownfieldHousing
0950	2.17	Zone 9	1,035,444	477,163	193,098	Yes	Yes	YesGreenfield	GreenfieldHousing
0968	2.71	Zone 3	2,643,258	973,924	394,126	Yes	Yes	YesGreenfield	GreenfieldHousing
0983	1.35	Zone 9	477,876	353,430	143,025	Yes	No	YesGreenfield	GreenfieldHousing
0990	1.07	Zone 9	504,473	471,470	190,794	Yes	Yes	YesGreenfield	GreenfieldHousing
1004	0.79	Zone 3	337,369	427,049	172,817	Yes	n/a	YesBrownfield	BrownfieldHousing
1009	1.52	Zone 9	126,331	83,284	33,703	Yes	n/a	YesMixed	MixedHousing
1019	1.32	Zone 3	498,801	377,879	152,919	Yes	n/a	YesMixed	MixedHousing
1128	1.06	Zone 7	1,085,059	1,025,125	414,846	Yes	Yes	YesGreenfield	GreenfieldHousing
1137	0.84	Zone 9	222,096	265,500	107,442	Yes	n/a	YesMixed	MixedHousing
1180	2.61	Zone 7	1,471,942	563,963	228,223	Yes	n/a	YesMixed	MixedHousing

Table 4.3 – Halifax Local Plan Area Results (Continued)

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
1194	1.18	Zone 7	929,966	787,425	318,654	Yes	Yes	YesGreenfield	GreenfieldHousing
1196	0.79	Zone 7	595,846	754,235	305,223	Yes	Yes	YesGreenfield	GreenfieldHousing
1197	1.09	Zone 7	1,026,099	941,375	380,954	Yes	Yes	YesGreenfield	GreenfieldHousing
1215	0.27	Zone 9	303,071	1,106,351	447,716	Yes	Yes	YesGreenfield	GreenfieldHousing
1216	9.60	Zone 9	819,089	85,322	34,528	Yes	n/a	YesMixed	MixedHousing
1229	16.68	Zone 9	10,624,001	636,931	257,752	Yes	Yes	YesGreenfield	GreenfieldHousing
1368	0.26	Zone 3	156,710	593,985	240,373	Yes	n/a	YesBrownfield	BrownfieldHousing
1379	1.13	Zone 3	1,216,867	1,078,367	436,392	Yes	Yes	YesGreenfield	GreenfieldHousing
1409	4.31	Zone 9	2,029,087	470,327	190,331	Yes	Yes	YesGreenfield	GreenfieldHousing
1425	3.30	Zone 7	2,344,748	710,530	287,536	Yes	n/a	YesMixed	MixedHousing
1429	2.76	Zone 3	1,630,888	590,901	239,125	Yes	n/a	YesBrownfield	BrownfieldHousing
1481	1.05	Zone 3	644,238	613,744	248,369	Yes	n/a	YesMixed	MixedHousing
1486	0.76	Zone 9	483,641	633,300	256,282	Yes	Yes	YesGreenfield	GreenfieldHousing
1487	0.34	Zone 9	382,864	1,120,922	453,613	Yes	Yes	YesGreenfield	GreenfieldHousing
1488	0.27	Zone 9	303,071	1,132,545	458,316	Yes	Yes	YesGreenfield	GreenfieldHousing
1489	0.34	Zone 9	382,864	1,126,069	455,696	Yes	Yes	YesGreenfield	GreenfieldHousing
1547	2.49	Zone 3	1,233,281	495,294	200,434	Yes	n/a	YesBrownfield	BrownfieldHousing
1590	0.59	Zone 7	448,016	757,825	306,675	Yes	Yes	YesGreenfield	GreenfieldHousing
1603	0.44	Zone 9	301,252	684,663	277,068	Yes	Yes	YesGreenfield	GreenfieldHousing
1609	0.99	Zone 9	432,418	436,786	176,758	Yes	n/a	YesMixed	MixedHousing

Table 4.4 - Hebden Bridge Local Plan Area Results

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	1,727,755	2,658,085	1,075,669	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1503	0.43	Zone 1	1,169,650	2,720,115	1,100,771	Yes	Yes	YesGreenfield	YesGreenfieldHousing

Table 4.5 - 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	1,993,108	759,077	307,182	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0253	0.28	Zone 3	380,046	1,354,838	548,273	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0931	1.21	Zone 3	1,264,979	1,041,463	421,457	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1372	3.23	Zone 3	1,381,080	427,195	172,876	Yes	Yes	YesGreenfield	YesGreenfieldHousing

Table 4.6 - 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	2,415,465	1,325,463	536,386	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0589	0.38	Zone 6	850,195	2,237,354	905,408	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0759	0.54	Zone 6	850,195	1,573,193	636,637	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0766	5.81	Zone 6	6,610,785	1,137,046	460,138	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0782	5.86	Zone 6	9,155,786	1,562,421	632,277	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1034	1.97	Zone 6	3,279,533	1,664,470	673,575	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1035	0.95	Zone 6	1,460,269	1,535,099	621,221	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1036	0.89	Zone 6	1,460,269	1,648,924	667,284	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1037	0.98	Zone 6	1,349,809	1,377,357	557,386	Yes	n/a	YesMixed	YesMixedHousing
1041	1.63	Zone 6	1,594,257	978,072	395,804	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1044	2.11	Zone 6	1,869,592	887,111	358,994	Yes	n/a	YesMixed	YesMixedHousing
1523	1.62	Zone 6	3,279,533	2,024,403	819,231	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1543	11.17	Zone 6	18,248,288	1,633,687	661,117	Yes	Yes	YesGreenfield	YesGreenfieldHousing

Table 4.7 – Ripponden Local Plan Area Results

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	1,131,381	2,131,697	862,651	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1023	1.41	Zone 4	470,024	333,350	134,900	Yes	n/a	YesBrownfield	YesBrownfieldHousing
1027	0.54	Zone 4	713,442	1,321,189	534,656	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1224	1.84	Zone 4	1,416,384	771,800	312,330	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1602	0.76	Zone 4	1,416,384	1,866,157	755,193	Yes	Yes	YesGreenfield	YesGreenfieldHousing

Table 4.8 - Sowerby Bridge Local Plan Area Results

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	3,608,989	1,221,903	494,477	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0287	0.84	Zone 3	491,619	586,075	237,172	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0435	0.30	Zone 3	684,067	2,300,509	930,965	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0438	0.63	Zone 3	635,955	1,001,646	405,344	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1356	1.20	Zone 3	(745,849)	-	-	No	No	NoGreenfield	NoGreenfieldApartments
1398	4.11	Zone 3	2,814,894	684,889	277,160	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1412	0.61	Zone 3	498,828	814,396	329,568	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1415	0.24	Zone 3	504,667	2,102,778	850,948	Yes	n/a	YesMixed	YesMixedHousing
1654	1.51	Zone 3	22,432	14,887	6,024	Yes	n/a	YesBrownfield	YesBrownfieldHousing
1655	1.45	Zone 3	342,277	236,681	95,780	Yes	n/a	YesBrownfield	YesBrownfieldHousing

Table 4.9 - Todmorden Local Plan Area Results

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	560,545	1,317,153	533,023	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0635	0.93	Zone 2	1,367,015	1,474,246	596,595	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0640	1.33	Zone 2	1,772,490	1,332,699	539,314	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0651	0.64	Zone 2	563,334	880,210	356,202	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0658	0.47	Zone 2	488,823	1,048,756	424,408	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0659	0.61	Zone 2	662,954	1,086,810	439,808	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0901	0.73	Zone 2	607,671	828,895	335,436	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0914	1.31	Zone 2	1,260,551	962,253	389,403	Yes	n/a	YesMixed	YesMixedHousing
1534	0.71	Zone 2	469,308	664,391	268,864	Yes	n/a	YesMixed	YesMixedHousing

## 5. Impact of Changes to Part L and F of the Building Regulations

- 5.1 On 7th February this year the Governments consultation period for changes to Part L and Part F of the Building Regulations closed and the Government estimates that these changes will come into effect later this year albeit there is some uncertainty around whether these changes will happen this year.
- 5.2 Within this section of the report we test the impact of the costs associated with changes to Part L and F of the Building Regulations on the viability of the draft housing allocations.

### Part L Changes

- 5.3 For the uplift of Part L standards for new homes, two options are being proposed.

#### Option 1 - 'Future Homes Fabric'

- 5.4 This would deliver a 20% reduction in CO<sub>2</sub> from new dwellings, compared to the current standards. On average this would add £2,870 to the build-cost of a new home<sup>19</sup>. This is based on:

- i. Very high fabric standards to minimise heat loss from windows, walls, floors and roofs (typically with triple glazing).
- ii. A gas boiler; and
- iii. A waste water heat recovery system.

#### Option 2 - 'Fabric plus technology'

- 5.5 This would deliver a 31% reduction in CO<sub>2</sub> from new dwellings, compared to the current standards. This option is likely to encourage the use of low-carbon heating and/or renewables. On average this would add £4,620 to the cost of a new home. This is based on:

- i. An increase in fabric standards (but not as high an increase as in Option 1, likely to have double rather than triple glazing)
- ii. A gas boiler
- iii. A waste water heat recovery system; and
- iv. Photovoltaic (solar) panels

- 5.6 The costs are significantly higher for this option which predominantly relates to the inclusion of photovoltaics (PV). This is the Governments preferred approach.

- 5.7 In practice, the Government expects that some developers would choose less costly ways of meeting the standard, such as putting in low-carbon heating now, which would reduce the average cost to £3130 per dwelling (we have referred to this as Option 2a).

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<sup>19</sup> Based on the Future Homes Standard Impact Assessment (October 2019)

## Part F Changes

- 5.8 Changes to Part F are proposed principally to simplify and clarify the guidance. This will make it easier for installers to understand and comply with the requirements and for building control to check. Changes are also proposed to reflect the latest understanding of how ventilation systems operate.
- 5.9 The Government propose to provide guidance for different ventilation strategies to reflect how these strategies relate to the air tightness of the dwelling, and when specialist advice should be sought. For natural ventilation systems the Government only propose to provide guidance for less airtight homes. For continuous mechanical extract, they propose to only provide guidance for more airtight homes. The changes also simplify the way that background ventilator sizes are determined in the approved document. For balanced supply and extract systems, it is proposed to increase the minimum background ventilation rate to accommodate a likely occupancy level for bedrooms.
- 5.10 The changes propose that the minimum whole dwelling ventilation rates are amended.
- 5.11 For continuous mechanical extract systems, it is proposed that the minimum level of background ventilators is increased from 2500 mm<sup>2</sup> to 5000 mm<sup>2</sup> per habitable room to make sure that air can be drawn through the background ventilators, accounting for the expected pressure differentials.
- 5.12 It is assumed that these changes can be accommodated through increased trickle ventilation. This would result in the requirement of two additional background ventilators – one of 5000mm<sup>2</sup> and one of 10000mm<sup>2</sup> equivalent area. The total capital cost of these trickle ventilators per home is estimated to be in the region of £17<sup>20</sup>.
- 5.13 We have modelled the impact of these additional costs based on the most expensive option (i.e. option 2 at £4,637<sup>21</sup> per dwelling). The results of our assessment shows.
- Whilst land values fall in the **Brighouse** Local Plan area the overall position on viability remains unchanged. All the sites that are 'Greenfield' are still viable and generate land values that are in excess of the benchmark land value (i.e. £159,000 per acres), with the exception of site 1322, this site remains unviable for apartments but could be brought forward viably for housing. All the Brownfield sites remain viable and generate land values that are reasonable. Site 0571 (Mixed) remains unviable but could be viably brought forward for housing. Mixed site 0174 also remains viable but generates a very low land value driven by the exceptionally low density of development on this site (circa 8 dwelling per hectare). Refer to Table 5.1.
  - All the sites in the **Elland** Local Plan Area remain viable with the inclusion of Part L and F costs. The Greenfield sites also generate land values that are in excess of the benchmark land value. The mixed Greenfield/Brownfield site (1283) generates a land value of circa £340,000 per acre which is still considered more than reasonable for the landowner. Our results are set out in Table 5.2.
  - Within the **Halifax** Local Plan Area sites 0407 (Brownfield) and 1009 (Mixed) become unviable in addition to site 0164 (Brownfield) which remains unviable. All the Greenfield sites remain viable, but additional

<sup>20</sup> <sup>20</sup> Based on the Future Homes Standard Impact Assessment (October 2019)

<sup>21</sup> £17 per dwelling for Part F changes and £4,620 per dwellings for Part L Changes

three sites (0950, 0990 and 1409) don't achieve the benchmark land value of £159,000 per acre. In total there are six sites that don't achieve this benchmark. There were only three sites that were not able to achieve this benchmark prior to imposing the costs associated with the Part L and F changes. For the Mixed sites which are viable five generate land values that fall below £100,000 per acre (0234,0261,1137,1216 and 1609). Only three sites generated land values below £100,000 prior to imposing the Part L and F costs. If affordable housing is excluded all these sites except for site 1216 generate land values ranging from circa £160,000 per acre to £275,000 per acre. If affordable housing is excluded, site 0164 remains unviable for apartments but could be viably developed for housing. However, at this stage it should not be forgotten that the assessment has taken a very cautious approach with respect to the brownfield sites assuming that all sites will require remediation and site preparation as well as applying the costs to 100% of the developable area.

- Both sites within the **Hebden Bridge** Local Plan area remain viable and generate land values in excess of the benchmark land value after the inclusion of costs associated with the Part L and F changes. Please refer to Table 5.4.
- All the Greenfield sites in **Mytholmroyd** Local Plan Area remain viable and all but one (1372) generate land values in excess of the benchmark after considering the impact of the Part F and Part L changes. Site 1372 generates a land value of circa £145,000 per acre which is marginally below the benchmark land. The Brownfield site (0253) also remains viable and generates a land value of circa £470,000 per acre, which is more than reasonable for a Brownfield site. Our findings are set out in Table 5.5
- All the allocations within the **Northowram and Shelf** Local Plan Area remain viable. All of the Greenfield sites continue to generate land values which are in excess of the benchmark land value after considering the impact of changes to Part F and L of the Building Regulations. The Mixed sites (1037 and 1044) generate land values of circa £490,000 and £315,000 per acre which are again more than reasonable for Brownfield site. Please refer to Table 5.6.
- All the Greenfield sites within the **Ripponden** Local Plan Area remain viable and generate land values in excess of the benchmark land value after considering the impact of changes to Part F and L. The Brownfield site (1023) is also viable, but the land value falls to circa £110,000 per acre. This is marginal but needs to be considered in the context of the cautious approach we have adopted when appraising brownfield sites. The results of our assessment are set out in Table 5.7.
- All of the greenfield sites in the **Sowerby Bridge** Local Plan Area, except site 1356 remain viable and generate land values in excess of the benchmark land value. Site 1356 was unviable before taking into consideration the costs associated with the Part L and F changes. This site has been appraised based on apartment development and could be viably developed for housing. In terms of the Brownfield sites one site (1654) becomes unviable after the costs of Part L and F changes are considered. However, this site was only marginally viable previously, generating a land value of circa £6,000 per acre. Sites 1412 and 1655 are viable but the land value for site 1655 is low at £58,828 per acres. Previously the value for this site was nearer £100,000 per acre. If affordable housing is excluded sites 1654 and 1655 generate land values of £135,000 and £205,000 per acre respectively. Site 1356 remains unviable. The Mixed site (1415) remains viable and generates land values of circa £750,000 per acre which is more than reasonable. Our findings are set out in Table 5.8.
- All the Greenfield sites within the **Todmorden** Local Plan Area remain viable and generate land values in excess of the benchmark land value (i.e. £159,000 per acre) after the impact of Part F and L changes are taken into consideration. In addition, the Brownfield and mixed Greenfield and Brownfield sites also

remain viable and generate land values which are reasonable, especially given our conservative approach to appraising these sites. Please refer to Table 5.9.

Table 5.1 - Brighouse Local Plan Area – Viability Results with Part F and L Changes

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	35,180	12,475	5,048	Yes	n/a	YesMixed	YesMixedHousing
0338	0.60	Zone 8	664,509	1,107,515	448,187	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0548	0.55	Zone 8	585,670	1,064,854	430,923	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0565	0.52	Zone 8	570,521	1,097,157	443,995	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0568	4.34	Zone 8	2,828,632	651,758	263,752	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0571	0.48	Zone 8	(3,969,593)	-	-	No	n/a	NoMixed	NoMixedApartments
0846	0.30	Zone 8	509,931	1,699,771	687,860	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0945	1.82	Zone 8	1,727,559	949,208	384,124	Yes	n/a	YesBrownfield	YesBrownfieldHousing
1000	0.54	Zone 8	776,514	1,437,988	581,922	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1032	1.65	Zone 8	1,335,101	809,152	327,446	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1033	3.22	Zone 8	3,632,135	1,127,992	456,474	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1053	3.73	Zone 8	2,525,850	677,172	274,037	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1054	1.23	Zone 8	1,064,099	865,121	350,095	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1060	0.64	Zone 8	720,511	1,125,799	455,586	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1077	13.02	Zone 8	5,343,982	410,444	166,098	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1078	10.62	Zone 8	9,807,862	923,527	373,731	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1093	1.23	Zone 8	650,043	528,490	213,869	Yes	n/a	YesBrownfield	YesBrownfieldHousing
1095	4.83	Zone 8	5,521,494	1,143,166	462,614	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1116	1.83	Zone 8	1,781,518	973,507	393,957	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1322	0.48	Zone 8	(2,773,890)	-	-	No	No	NoGreenfield	NoGreenfieldApartments
1469	0.44	Zone 8	681,092	1,530,983	619,555	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1468	0.85	Zone 8	525,249	617,940	250,067	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0771	0.61	Zone 8	1,021,470	1,674,541	677,650	Yes	n/a	YesBrownfield	YesBrownfieldHousing

Table 5.2 - Elland Local Plan Area – Viability Results with Part F and L Changes

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	2,489,511	1,114,232	450,905	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0037	0.95	Zone 5	994,457	1,045,456	423,073	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0065	1.01	Zone 5	777,879	770,177	311,674	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0146	0.86	Zone 5	1,041,205	1,212,139	490,526	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0177	9.87	Zone 5	7,205,168	730,218	295,503	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0952	10.63	Zone 5	9,534,430	896,761	362,899	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0964	0.63	Zone 5	543,389	862,523	349,044	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0978	8.28	Zone 5	8,904,002	1,075,605	435,274	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1030	0.54	Zone 5	664,973	1,227,627	496,794	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1283	0.51	Zone 5	427,870	838,960	339,509	Yes	n/a	YesMixed	YesMixedHousing
1407	0.44	Zone 5	590,137	1,344,897	544,250	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1567	20.53	Zone 5	16,198,504	789,123	319,341	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1616	2.19	Zone 5	1,556,933	710,257	287,425	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1625	1.01	Zone 5	994,457	984,005	398,205	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1657	0.76	Zone 5	994,457	1,304,851	528,045	Yes	Yes	YesGreenfield	YesGreenfieldHousing

Table 5.3 - Halifax Local Plan Area – Viability Results with Part F and L Changes (Part 1)

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	604,799	810,795	328,111	Yes	Yes	YesGreenfield	GreenfieldHousing
0103	1.25	Zone 9	307,739	247,031	99,968	Yes	No	YesGreenfield	GreenfieldHousing
0164	0.38	Zone 9	(758,794)	-	-	No	n/a	NoBrownfield	BrownfieldApartments
0234	3.33	Zone 9	515,438	154,786	62,639	Yes	n/a	YesMixed	MixedHousing
0238	0.31	Zone 9	270,273	873,322	353,414	Yes	Yes	YesGreenfield	GreenfieldHousing
0242	0.40	Zone 9	313,569	775,063	313,651	Yes	Yes	YesGreenfield	GreenfieldHousing
0261	2.69	Zone 9	302,806	112,476	45,516	Yes	n/a	YesMixed	MixedHousing
0353	0.32	Zone 8	592,591	1,837,089	743,429	Yes	Yes	YesGreenfield	GreenfieldHousing
0397	0.52	Zone 7	477,980	925,824	374,661	Yes	Yes	YesGreenfield	GreenfieldHousing
0400	0.31	Zone 7	290,988	935,586	378,611	Yes	Yes	YesGreenfield	GreenfieldHousing
0407	0.47	Zone 9	(56,824)	-	-	No	n/a	NoBrownfield	BrownfieldHousing
0452	2.45	Zone 9	1,341,299	547,453	221,542	Yes	Yes	YesGreenfield	GreenfieldHousing
0454	1.06	Zone 9	313,569	295,058	119,403	Yes	No	YesGreenfield	GreenfieldHousing
0478	0.28	Zone 7	364,063	1,317,875	533,315	Yes	n/a	YesBrownfield	BrownfieldHousing
0523	3.46	Zone 3	4,310,525	1,245,816	504,155	Yes	Yes	YesGreenfield	GreenfieldHousing
0531	7.18	Zone 3	3,290,635	458,306	185,466	Yes	Yes	YesGreenfield	GreenfieldHousing
0683	0.32	Zone 9	270,273	844,735	341,846	Yes	Yes	YesGreenfield	GreenfieldHousing
0814	0.99	Zone 7	649,152	656,928	265,844	Yes	n/a	YesBrownfield	BrownfieldHousing
0815	1.34	Zone 7	705,285	526,332	212,995	Yes	n/a	YesBrownfield	BrownfieldHousing
0950	2.17	Zone 9	775,388	357,322	144,600	Yes	No	YesGreenfield	GreenfieldHousing
0968	2.71	Zone 3	2,253,174	830,196	335,962	Yes	Yes	YesGreenfield	GreenfieldHousing
0983	1.35	Zone 9	329,387	243,609	98,583	Yes	No	YesGreenfield	GreenfieldHousing
0990	1.07	Zone 9	351,035	328,070	132,763	Yes	No	YesGreenfield	GreenfieldHousing
1004	0.79	Zone 3	205,161	259,697	105,094	Yes	n/a	YesBrownfield	BrownfieldHousing
1009	1.52	Zone 9	(76,754)	-	-	No	n/a	NoMixed	MixedHousing
1019	1.32	Zone 3	362,753	274,813	111,211	Yes	n/a	YesMixed	MixedHousing
1128	1.06	Zone 7	896,973	847,428	342,936	Yes	Yes	YesGreenfield	GreenfieldHousing
1137	0.84	Zone 9	80,306	96,000	38,849	Yes	n/a	YesMixed	MixedHousing
1180	2.61	Zone 7	1,162,925	445,565	180,310	Yes	n/a	YesMixed	MixedHousing

Table 5.3 - Halifax Local Plan Area – Viability Results with Part F and L Changes (Part 2)

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
1194	1.18	Zone 7	756,729	640,741	259,294	Yes	Yes	YesGreenfield	GreenfieldHousing
1196	0.79	Zone 7	491,904	622,663	251,978	Yes	Yes	YesGreenfield	GreenfieldHousing
1197	1.09	Zone 7	833,063	764,278	309,287	Yes	Yes	YesGreenfield	GreenfieldHousing
1215	0.27	Zone 9	248,625	907,598	367,285	Yes	Yes	YesGreenfield	GreenfieldHousing
1216	9.60	Zone 9	358,015	37,293	15,092	Yes	n/a	YesMixed	MixedHousing
1229	16.68	Zone 9	7,878,962	472,360	191,154	Yes	Yes	YesGreenfield	GreenfieldHousing
1368	0.26	Zone 3	125,050	473,982	191,810	Yes	n/a	YesBrownfield	BrownfieldHousing
1379	1.13	Zone 3	1,004,033	889,757	360,065	Yes	Yes	YesGreenfield	GreenfieldHousing
1409	4.31	Zone 9	1,504,159	348,653	141,092	Yes	No	YesGreenfield	GreenfieldHousing
1425	3.30	Zone 7	1,829,719	554,460	224,378	Yes	n/a	YesMixed	MixedHousing
1429	2.76	Zone 3	1,145,289	414,960	167,925	Yes	n/a	YesBrownfield	BrownfieldHousing
1481	1.05	Zone 3	482,996	460,134	186,206	Yes	n/a	YesMixed	MixedHousing
1486	0.76	Zone 9	350,001	458,306	185,466	Yes	Yes	YesGreenfield	GreenfieldHousing
1487	0.34	Zone 9	313,569	918,045	371,513	Yes	Yes	YesGreenfield	GreenfieldHousing
1488	0.27	Zone 9	248,625	929,086	375,981	Yes	Yes	YesGreenfield	GreenfieldHousing
1489	0.34	Zone 9	313,569	922,261	373,219	Yes	Yes	YesGreenfield	GreenfieldHousing
1547	2.49	Zone 3	826,163	331,792	134,269	Yes	n/a	YesBrownfield	BrownfieldHousing
1590	0.59	Zone 7	368,821	623,867	252,465	Yes	Yes	YesGreenfield	GreenfieldHousing
1603	0.44	Zone 9	221,364	503,100	203,593	Yes	Yes	YesGreenfield	GreenfieldHousing
1609	0.99	Zone 9	199,250	201,262	81,446	Yes	n/a	YesMixed	MixedHousing

Table 5.4 - Hebden Bridge Local Plan Area – Viability Results with Part F and L Changes

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	1,584,216	2,437,255	986,304	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1503	0.43	Zone 1	1,070,657	2,489,900	1,007,608	Yes	Yes	YesGreenfield	YesGreenfieldHousing

Table 5.5 - Mytholmroyd Local Plan Area – Viability Results with Part F and L Changes

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	1,689,709	643,527	260,421	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0253	0.28	Zone 3	324,619	1,157,245	468,312	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0931	1.21	Zone 3	1,047,196	862,161	348,898	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1372	3.23	Zone 3	1,148,447	355,237	143,757	Yes	No	YesGreenfield	YesGreenfieldHousing

Table 5.6 - Northowram and Shelf Local Plan Area – Viability Results with Part F and L Changes

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	2,187,782	1,200,525	485,826	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0589	0.38	Zone 6	800,698	2,107,101	852,698	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0759	0.54	Zone 6	800,698	1,481,605	599,573	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0766	5.81	Zone 6	6,032,882	1,037,648	419,913	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0782	5.86	Zone 6	8,356,353	1,425,999	577,070	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1034	1.97	Zone 6	3,000,213	1,522,706	616,206	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1035	0.95	Zone 6	1,326,629	1,394,611	564,368	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1036	0.89	Zone 6	1,326,629	1,498,019	606,215	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1037	0.98	Zone 6	1,193,606	1,217,966	492,884	Yes	n/a	YesMixed	YesMixedHousing
1041	1.63	Zone 6	1,435,869	880,901	356,481	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1044	2.11	Zone 6	1,642,845	779,521	315,455	Yes	n/a	YesMixed	YesMixedHousing
1523	1.62	Zone 6	3,000,213	1,851,983	749,457	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1543	11.17	Zone 6	16,654,239	1,490,979	603,367	Yes	Yes	YesGreenfield	YesGreenfieldHousing

Table 5.7 - Ripponden Local Plan Area – Viability Results with Part F and L Changes

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	1,076,935	2,029,113	821,137	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1023	1.41	Zone 4	384,364	272,599	110,315	Yes	n/a	YesBrownfield	YesBrownfieldHousing
1027	0.54	Zone 4	654,046	1,211,197	490,145	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1224	1.84	Zone 4	1,297,593	707,069	286,135	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1602	0.76	Zone 4	1,297,593	1,709,644	691,855	Yes	Yes	YesGreenfield	YesGreenfieldHousing

Table 5.8 - Sowerby Bridge Local Plan Area – Viability Results with Part F and L Changes

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	3,069,613	1,039,286	420,576	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0287	0.84	Zone 3	442,123	527,069	213,293	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0435	0.30	Zone 3	614,772	2,067,471	836,660	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0438	0.63	Zone 3	571,610	900,301	364,332	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1356	1.20	Zone 3	(926,318)	-	-	No	No	NoGreenfield	NoGreenfieldApartments
1398	4.11	Zone 3	2,395,914	582,947	235,906	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1412	0.61	Zone 3	409,735	668,941	270,706	Yes	Yes	YesGreenfield	YesGreenfieldHousing
1415	0.24	Zone 3	444,201	1,850,837	748,993	Yes	n/a	YesMixed	YesMixedHousing
1654	1.51	Zone 3	(139,275)	-	-	No	n/a	NoBrownfield	NoBrownfieldHousing
1655	1.45	Zone 3	210,227	145,370	58,828	Yes	n/a	YesBrownfield	YesBrownfieldHousing

Table 5.9 - Todmorden Local Plan Area – Viability Results with Part F and L Changes

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	495,041	1,163,233	470,735	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0635	0.93	Zone 2	1,183,878	1,276,744	516,670	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0640	1.33	Zone 2	1,529,958	1,150,344	465,519	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0651	0.64	Zone 2	513,838	802,872	324,905	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0658	0.47	Zone 2	372,931	800,111	323,787	Yes	n/a	YesBrownfield	YesBrownfieldHousing
0659	0.61	Zone 2	578,810	948,869	383,987	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0901	0.73	Zone 2	528,476	720,870	291,720	Yes	Yes	YesGreenfield	YesGreenfieldHousing
0914	1.31	Zone 2	1,028,766	785,317	317,801	Yes	n/a	YesMixed	YesMixedHousing
1534	0.71	Zone 2	378,610	535,991	216,904	Yes	n/a	YesMixed	YesMixedHousing

## 6. Conclusions

6.1 Through this assessment we have demonstrated that the draft housing allocations, as at August 2020<sup>22</sup> are viable having taken into consideration the policy requirements set out within the Publication Draft of the Local Plan, including:

- Policy SD7 (Allocated Housing Sites),
- Policy HS2 (Residential Density)
- Policy HS3 (Housing Mix)
- Policy HS4 (Housing for Independent Living)
- Policy HS6 (Affordable Housing)
- Policy IM4 (Sustainable Travel); and
- Policy BT3 (Landscaping)

6.2 Whilst there are a handful of sites that exhibit viability challenges these are mainly related to Brownfield and Mixed Greenfield/Brownfield sites. This is not surprising in view of the cautious approach we have taken to assessing these site typologies within this assessment. In addition, several sites that were appraised based on apartments also exhibited viability challenges, but these sites could be developed viably for housing. Further to this our assessment has demonstrated that for those sites which do exhibit viability challenges this can be mitigated through a more flexible approach to the level of affordable housing being sought, albeit this would only be necessary for a small number of sites.

6.3 With respect to the Brownfield sites it was announced on "On 30 June that a £67m Brownfield Fund allocation was being given to West Yorkshire. This funding has been allocated on a per capita basis to Mayoral Combined Authorities (including Calderdale) and the £67m, which is to be spent by 2024/25, will provide capital funding to move key sites within the pipeline forward. The Council will be working work collaboratively at pace with the Combined Authority to set out a programme of work for the Brownfield Fund monies." This will also assist in the delivery of those Brownfield and Mixed sites that exhibit viability challenges.

6.4 Our assessment also demonstrated that the impact of forthcoming coming changes to Part F and L of the Building Regulations is unlikely to have a material impact on the viability of the housing allocations.

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<sup>22</sup> Refer to Appendix 1

## Appendix 1 – Draft Housing Allocations

Local Plan Site Ref	Property Name/Number	Road/Street Name	Locality	Town	Postcode	Local_Plan_Area	Draft Plan Proposed Use	Land Type	Gross Area	Net Area	dph	No. Dwg's
0011	Tenterfields	Burnley Road	Luddenden Foot	Hallifax	HX2 6	Mytholmroyd	New Housing Site	Greenfield	2.63	2.11	29.86	63
0026	The Gate Farm	Saddleshorn Road	Greetland	Elland	HX8 8NW	Elland	Additional New Housing Site	Greenfield	2.23	2.23	34.04	67
0037	Long Heys Farm	Long Heys	Greetland	Elland	HX4 8BJ	Elland	New Housing Site	Greenfield	0.95	0.84	35.71	30
0044	Cemetery Lane	Lower Bentley Royd		Sowerby Bridge	HX6 1DN	Sowerby Bridge	New Housing Site	Greenfield	2.95	2.95	37.97	112
0046	Goosegate Farm	Heathy Lane	Holmfild	Hallifax	HX2 9UN	Hallifax	New Housing Site	Greenfield	0.75	0.7	35.71	25
0053	Land off Key Syke Lane	Kilnhurst		Todmorden	DL14 6AW	Todmorden	New Housing Site	Brownfield	0.43	0.29	44.83	23
0055	Land north-west	Nab End Lane		West Vale		Elland	New Housing Site	Greenfield	1.01	0.65	35.38	23
0103	Land at	Horley Green Road		Claremount		Hallifax	New Housing Site	Greenfield	1.25	1.25	23.20	29
0146	Land to the west of West View	Church Lane		Elland		Elland	New Housing Site	Greenfield	0.86	0.86	36.05	31
0164	Site of High Level Works	Pellon Lane		Pellon		Hallifax	New Housing Site	Brownfield	0.38	0.38	89.47	34
0174	End of	Wilton Street		Brighouse	HD6 2QY	Brighouse	New Housing Site	Mixed	2.82	1.85	8.11	15
0177	Land adjacent Ellistones Place	Saddleshorn Road		Greetland	HX4 8LG	Elland	Additional New Housing Site	Greenfield	9.87	6.65	30.08	200
0221	Land at	Spains Head		Northorham	HX3	Northorham and Shelf	New Housing Site	Greenfield	1.82	1.27	36.22	46
0234	Swinton	Hay Lane		Mixenden		Hallifax	New Housing Site	Mixed	3.33	2.52	38.89	98
0238	Land at rear of former St Bernadettes Churr	Clough Lane		Mixenden		Hallifax	New Housing Site	Greenfield	0.31	0.31	38.71	12
0242	Land opposite 109-119	Mixenden Road		Mixenden		Hallifax	New Housing Site	Greenfield	0.40	0.4	35.00	14
0253	Junction of Grosvenor Place	Burnley Road	Luddenden Foot	Hallifax		Mytholmroyd	New Housing Site	Brownfield	0.28	0.28	39.29	11
0261	Land at	Turner Avenue South		Ovenden		Hallifax	New Housing Site	Mixed	2.69	2.69	28.52	77
0287	Land rear of 287	Willowfield Road		Ovenden		Sowerby Bridge	New Housing Site	Greenfield	0.84	0.73	13.70	10
0338	Land adjacent Whinney Hill Park	Whinney Hill		Brighouse		Brighouse	New Housing Site	Greenfield	0.60	0.6	36.67	22
0353	Land to the rear 109	Fairfax Crescent		Southorham		Hallifax	New Housing Site	Greenfield	0.32	0.33	27.27	9
0397	Land adjacent to Daisy Bank	Savile Park		Savile Park	HX1	Hallifax	New Housing Site	Greenfield	0.52	0.46	21.74	10
0400	Land off	Birdcage Lane		Hallifax		Hallifax	New Housing Site - with PP	Greenfield	0.31	0.31	0.00	6
0407	Spring Hill Mills	Mile Cross Road		Hallifax		Hallifax	New Housing Site	Brownfield	0.47	0.47	34.04	16
0435	Land off	Haugh End Lane		Sowerby	HX6 3BJ	Sowerby Bridge	New Housing Site	Greenfield	0.30	0.3	46.67	14
0438	Land off	Dean Lane		Sowerby		Sowerby Bridge	New Housing Site	Greenfield	0.63	0.37	35.14	13
0452	Land at Ovenden Green			Ovenden		Hallifax	New Housing Site	Greenfield	2.45	2.45	40.00	98
0454	Land off	Wheatley Road		Lee Mount		Hallifax	New Housing Site	Greenfield	1.06	0.66	21.21	14
0478	Skircoat Road	Skircoat Road		Hallifax		Hallifax	New Housing Site	Brownfield	0.28	0.28	39.29	11
0523	Land at	Furness Avenue		Illingworth		Hallifax	New Housing Site	Greenfield	3.46	3.45	45.80	158
0531	Land off Whitehill Road	Keighley Road		Hallifax		Hallifax	New Housing Site	Greenfield	7.18	4.34	28.11	122
0548	Land at junction of	Granny Hall La. & Blackburn Rd		Brighouse		Brighouse	New Housing Site	Greenfield	0.55	0.55	29.09	16
0565	Land at	Bowling Alley/Scholey Avenue		Rastrick		Brighouse	New Housing Site	Greenfield	0.52	0.28	35.71	10
0588	Land south of Clough Lane	Rear of New Hey Road		Rastrick	HD6	Brighouse	New Housing Site	Greenfield	4.34	2.36	33.05	78
0571	Site to the rear of 3A	Birds Royd Lane		Brighouse		Brighouse	New Housing Site	Mixed	0.48	0.38	26.15	100
0589	Land Adjacent to & Rear of 8 Back Clough		Northorham	Hallifax	HX3 7HH	Northorham and Shelf	New Housing Site	Greenfield	0.38	0.38	26.32	10
0635	Land off	Fir Street		Walsden		Todmorden	New Housing Site	Greenfield	0.93	0.83	44.58	37
0640	Land off The Hollins,	Stansfield Hall Road		Todmorden	OL14	Todmorden	New Housing Site	Greenfield	1.33	1.09	44.95	49
0651	Land off	Stoney Royd Lane		Todmorden		Todmorden	New Housing Site	Greenfield	0.64	0.59	16.95	10
0658	Cinderhill Mills	Hallifax Road		Todmorden	OL145TH	Todmorden	New Housing Site	Brownfield	0.47	0.47	34.04	23
0659	Land rear of 302	Hallifax Road		Todmorden		Todmorden	New Housing Site	Greenfield	0.61	0.51	33.33	17
0683	Land at	Bank Top/Common Lane		Hallifax	HX3 9PD	Hallifax	New Housing Site	Greenfield	0.32	0.32	37.50	12
0759	Land off	Belle Vue Rise		Shelf		Northorham and Shelf	New Housing Site - with PP	Greenfield	0.54	0.27	0.00	10
0766	Land off	Hill Lane		Northorham	HX3 7SN	Northorham and Shelf	Additional New Housing Site	Greenfield	5.81	3.08	38.96	120
0771	Firth's Carpets	432 Bradford Road		Brighouse		Brighouse	New Housing Site	Brownfield	0.61	0.61	67.21	41
0782	Land off	Cock Hill Lane		Hallifax		Northorham and Shelf	New Housing Site	Greenfield	5.86	5.52	34.07	166
0814	Land at Richmond Street	Stannary Place		Hallifax		Hallifax	New Housing Site	Brownfield	0.99	0.99	52.53	52
0815	Works Depot	Stannary Place		Hallifax		Hallifax	New Housing Site	Brownfield	1.34	1.34	46.27	62
0846	The Bramble Inn	Field Lane		Rastrick	HD6 3NX	Brighouse	New Housing Site	Brownfield	0.30	0.3	40.00	12
0901	Land off	Woodlands Avenue		Todmorden		Todmorden	New Housing Site	Greenfield	0.73	0.32	50.00	16
0914	Land Opposite 46-48	Hollins Road		Walsden		Todmorden	New Housing Site	Mixed	1.31	1.03	44.66	46
0931	Land at	Grave House Field		Luddenden	OL14 8BJ	Mytholmroyd	Additional New Housing Site	Greenfield	1.21	1.21	36.36	44
0938	Holme House	Holme House Lane		Risworth	HX6 4PY	Ripponden	New Housing Site	Greenfield	0.53	0.27	40.74	11
0945	Pond Quarry	Lightcliffe Road		Brighouse	HD6 2JJ	Brighouse	New Housing Site	Brownfield	1.82	1.82	41.21	75
0950	Beacon Lodge Quarry	Long Lane		Hallifax		Hallifax	New Housing Site	Greenfield	2.17	1.8	30.00	54
0952	Land at New Gate Farm	Saddleshorn Road		Greetland		Elland	Additional New Housing Site	Greenfield	10.63	7.8	20.00	264
0964	Land off	Wachdale Road		Elland		Elland	New Housing Site	Greenfield	0.63	0.55	35.27	15
0968	Land at West End Golf Club	Paddock Lane	Highroad Well	Hallifax	HX2 0NT	Hallifax	New Housing Site	Greenfield	2.71	2.71	29.89	81
0978	Land off	Lower Edge Road/Shaw Lane		Elland	HD6 3JN	Elland	New Housing Site	Greenfield	8.28	8.28	29.95	248
0983	Land at	Maltins Road		Wheatley		Hallifax	Additional New Housing Site	Greenfield	1.35	0.91	32.97	30
0990	Land off	Denfield Lane		Wheatley		Hallifax	New Housing Site	Greenfield	1.07	0.85	36.47	31
1000	Land off	Woodhouse Lane		Rastrick	Brighouse	Brighouse	New Housing Site	Greenfield	0.54	0.53	45.28	24
1004	Land off	Burnley Road		Wartley	HX2 7NB	Hallifax	New Housing Site	Brownfield	0.79	0.73	35.62	26
1009	Site of demolished School	Clough Lane / Brow Bottom Lane		Mixenden	HX2	Hallifax	New Housing Site	Mixed	1.52	1.52	25.00	38
1019	Land adjacent to White House Farm	Riley Lane		Holmfild	HX2 9SZ	Hallifax	New Housing Site	Mixed	1.32	0.99	27.27	27
1023	Land off	Hallifax Road		Triangle		Ripponden	New Housing Site	Brownfield	1.41	1.06	16.04	17
1027	Land North of	Stonelea		Sowerby Bridge	HX4 0HD	Ripponden	New Housing Site	Greenfield	0.54	0.33	36.36	12
1030	Land adjoining South Parade	Adi Mares Fold		Elland	HX5 0PH	Elland	New Housing Site	Greenfield	0.54	0.54	38.84	14
1032	Southgates Quarry	Ogden Lane & Toothill Bank		Rastrick	Brighouse	Brighouse	New Housing Site	Greenfield	1.65	1.05	40.00	42
1033	Land off	Toothill Bank		Rastrick	HD6	Brighouse	New Housing Site	Greenfield	3.22	3.22	30.12	97
1034	Land off Soaper Lane			Shelf	HX3 7PT	Northorham and Shelf	Additional New Housing Site	Greenfield	1.97	1.95	29.74	58
1035	Land at	30 Burned Road		Shelf	HX3 7PT	Northorham and Shelf	Additional New Housing Site	Greenfield	0.95	0.95	28.42	27
1036	Land north of Shelf Cricket Ground	Can House Lane		Shelf	HX3 7PT	Northorham and Shelf	Additional New Housing Site	Greenfield	0.89	0.89	34.24	27
1037	Land off	Burned Road		Shelf	HX3 7PT	Northorham and Shelf	Additional New Housing Site	Mixed	0.98	0.98	31.63	11
1041	Land at	West Street & Halifax Road		Shelf		Northorham and Shelf	New Housing Site	Greenfield	1.63	0.89	35.96	32
1044	Hud Hill Farm			Northorham	HX3 7LH	Northorham and Shelf	Additional New Housing Site	Mixed	2.11	1.51	29.80	45
1053	Squire Hill Quarry			Brighouse	HD6	Brighouse	New Housing Site	Greenfield	3.73	2.26	30.09	68
1054	Land off	Brookfoot Lane		Brighouse	HX3 9SX	Brighouse	New Housing Site	Greenfield	1.23	0.9	35.56	32
1060	Land at	Shirley Grove		Brighouse		Brighouse	New Housing Site	Greenfield	0.64	0.64	35.24	23
1077	Southedge Quarry	Brighouse Road		Hipperholme	HX3	Brighouse	New Housing Site	Greenfield	13.02	6.65	21.95	146
1078	Land between	Dewsbury Road and New Hey Road		Rastrick	HD6	Brighouse	New Housing Site	Greenfield	10.62	5.14	51.95	267
1093	Former Hill Crest Quarry	Hove Edge		Brighouse	HD6 2QJ	Brighouse	New Housing Site	Brownfield	1.23	0.97	36.08	35
1095		Hove Edge		Brighouse	HD6	Brighouse	New Housing Site	Greenfield	4.83	4.04	36.88	149
1116		Brighouse Road		Hipperholme	HX3	Brighouse	New Housing Site	Greenfield	1.83	1.05	47.62	50
1128	Land off Park Lane			Siddal	HX3	Hallifax	Additional New Housing Site	Greenfield	1.05	0.6	35.24	23
1137	Horley Green Works	Horley Green Road		Claremount	HX3 6AS	Hallifax	New Housing Site	Mixed	0.84	0.84	32.14	27
1180	Old Lane Dyeworks	Old Lane		Hallifax		Hallifax	New Housing Site	Mixed	2.61	1.01	62.38	63
1194	Barn Cottage	5 Lower Exley		Siddal	HX3 9EF	Hallifax	New Housing Site	Greenfield	1.18	1.1	31.82	35
1196	Land off	Park Lane		Siddal	HX3 9FX	Hallifax	New Housing Site	Greenfield	0.79	0.57	36.84	21
1197	Land off	Park Lane		Siddal		Hallifax	New Housing Site	Greenfield	1.09	1.09	35.78	29
1215	Land adjacent	Boothtown Road		Boothtown		Hallifax	New Housing Site	Greenfield	0.27	0.27	40.74	11
1216	Land off	Mill Lane and Old Lane		Boothtown	HX36PT	Hallifax	New Housing Site	Mixed	9.60	3.14	29.94	94
1224	Land North of Meadowcroft Lane	Hallifax Road		Ripponden		Sowerby Bridge	New Housing Site	Greenfield	1.84	1.18	20.34	24
1229		Near Royd		Ovenden	HX3 5QP	Hallifax	New Housing Site	Greenfield	16.68	15.79	36.10	570
1283	Gleeholme	Green Lane		Greetland		Hallifax	New Housing Site	Mixed	0.51	0.3	36.57	11
1322	George Street			Rastrick		Brighouse	New Housing Site - with PP	Greenfield	0.48	0.35	185.71	65
1356	Hollins Park	Cemetery Lane		Sowerby Bridge		Sowerby Bridge	New Housing Site	Greenfield	1.20	0.45	75.56	34
1368	Furness Drive/Turner Avenue South			Hallifax		Hallifax	New Housing Site	Brownfield	0.26	0.26	23.08	6
1372	Kershaw Drive		Luddenden Foot	Hallifax		Mytholmroyd	Additional New Housing Site	Greenfield	3.23	1.79	26.26	47
1379	Heathmoor Park Road/Field Head Lane			Hallifax		Hallifax	New Housing Site	Greenfield	1.13	1.13	38.05	43
1398	Land on the West side of Brockwell Lane			Triangle	HX6 3PQ	Sowerby Bridge	New Housing Site	Greenfield	4.11	2.9	30.0	

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