

Name	
Firm / Developer	
On behalf of	
Site	
Date	

London Borough of Enfield Whole Plan and CIL Viability Update February 2021 - Consultation

1. Enfield Council is producing a new a Local Plan and considering a review of CIL. HDH Planning & Development Ltd has been appointed to update the viability elements of the evidence base as required by the 2019 NPPF and relevant guidance.
2. The new Local Plan will set out the contributions expected from development, including the quantum and mix of affordable housing as well as other infrastructure such as education, health, transport, digital, water and green infrastructure. As part of its preparation, the new Local Plan needs to be tested to ensure it remains viable and deliverable in line with tests set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG) and the revised Community Infrastructure Levy Regulations. This includes:
 - assessing the cumulative impact of the emerging policies, including affordable housing and open space requirements;
 - testing the deliverability of the key development site allocations that are earmarked to come forward over the course of the Local Plan period; and
 - considering the ability of development to accommodate CIL and section 106 contributions alongside other policy requirements.
3. HDH Planning & Development Ltd has been appointed to update the viability elements of the evidence base as required by the 2019 NPPF and relevant guidance. A pre-consultation draft report has been prepared for comment. It is an early working draft setting out the proposed methodology, modelling and assumptions. It is inevitable that some of these will change as a result of the consultation. This early draft report does not include results or recommendations, these will be included following feedback on the base assumptions – and thus ensure that the analysis is firmly based and robust.
4. This questionnaire is being circulated to landowners, site promoters, developers, housing associations, agents and others involved in the local development markets. Consultees are invited to comment on any aspect of this draft report. This questionnaire has been prepared to facilitate comments, however there is no specific need to use the questionnaire form, or to limit the responses to the particular questions or topics.

5. The pre-consultation draft report sets out the evidence as collated by HDH. It draws on a wide range of sources. It is important that responses submitted through this consultation are supported by evidence. Comments that simply observe a particular assumption is too low are too high are not helpful in establishing the correct assumption. Responses need to be supported by evidence, or alternatively point to sources of evidence that HDH can draw on and use to evidence the changes made in the next iteration of this viability assessment.
6. Please do not feel that you need to comment to all aspects of the report – please comment of those areas where you have expertise. Where there are areas of agreement it is useful for these to be acknowledged.
7. Please return to LocalPlan@enfield.gov.uk by midday on 31st March 2021.
8. The pre-consultation report is set out in Chapters as follows:

Chapter 1

10. This chapter sets out the context to this report.
11. It is important to note that the HDH is a firm of Chartered Surveyors and is therefore regulated by the RICS. The report is prepared in line with the requirements of *Financial viability in planning: conduct and reporting. 1st edition, May 2019*. It is mandatory for Chartered Surveyors to follow this guidance, including surveyors responding to this consultation.
12. Please provide any comments on the context and scope of the project.

Context
Response.

Chapter 2

13. This chapter sets out the approach to viability testing, including a review of the requirements of the 2019 NPPF the updated PPG and the CIL Regulations.
14. Please provide any comments on the overall approach taken.

Regulation and Framework.
Response.

Chapter 3

15. This chapter sets out the methodology used.
16. Please provide any comments with regard to the methodology used, including the use of the 'Existing Use Value Plus' approach.

Methodology
Response.

Chapter 4

17. This chapter sets out an assessment of the housing market, including market and affordable housing, with the purpose of establishing the worth of different types of housing in different geographical areas. Please provide any comments on the assumptions proposed, providing evidence to support the comments made:

18. The market housing assumptions are set out in Table 4.7.

Market Housing Values - Typologies
Response.

19. The value assumptions for the Build to Rent sector are set out in paragraph 4.56.

Build to Rent Housing Values
Response.

20. The affordable housing assumptions are set out in paragraphs 4.63, 4.71 and 4.73.

Affordable Housing Values
Response.

21. The assumptions for specialist older peoples housing are set out in paragraph 4.83.

Older Peoples Housing Values
Response.

22. The assumptions for specialist Student Housing and Shared Living are set out in Table 4.22.

Value of Student Housing and Shared Housing s
Response.

Chapter 5

23. This chapter includes an assessment of the non-residential market. The assumptions for non-residential uses are set out in Table 5.1. Are these in line with your understanding of the market?

Non-Residential Values
Response.

Chapter 6

24. This chapter includes an assessment of the approach to Existing Use Value and to establishing Benchmark Land Value.

25. The EUV assumptions are set out in Table 6.4. Are these in line with the current market?

EUV Assumptions
Response.

26. The BLV assumptions are set out in Paragraph 6.31. Does the BLV provide an adequate landowner's premium? If not, why not, and what assumption should be used – and why?

BLV Assumptions
Response.

Chapter 7

27. The cost and general development assumptions to be used in the development appraisals are set out through this chapter. Do the assumptions used reflect current development costs in the Borough?

Construction and Development Costs
Response.

Chapter 8

28. This chapter includes a summary of the policy options that apply to new development, together with our understanding of how they may be implemented and whether they add to the costs of development.
29. Does this correspond to the working of the policies on the ground?

Current local policy requirements
Response.

30. The government is consulting on several new areas of policy (such as the move towards zero carbon, bio-diversity net gain, First Homes). Are there other emerging areas of national policy that should be taken into account?

Emerging national policy requirements
Response.

Chapter 9

31. The modelling is based on the expected development over the period until the Local Plan is reviewed.

32. Do the typologies reflect the expected range of residential development?

Typologies
Response.

33. The assessment includes the modelling of the strategic sites, based on high level information. Is this a sound approach, if not why not?

Strategic Sites
Response.

34. Do the assumptions (such as gross/net and density) reflect local practice?

Modelling Assumptions
Response.

35. Several non-residential uses have been modelled, do others need to be included?

Non-residential development modelling assumptions
Response.

Chapter 10

36. In due course this chapter will set the results of the appraisals and consideration of residential development. It is planned to test the following scenarios:

- a. Impact of changes in costs and values.
- b. Varied developer contributions
- c. Higher environmental standards
- d. District heating
- e. Contributions towards Green Infrastructure
- f. Affordable Housing – quantum, threshold, tenure and mix
- g. First Homes
- h. Low initial portion shared ownership
- i. Sprinklers
- j. Accessible and Adaptable Standards.
- k. Review of CIL

37. Should further sensitivity testing be carried out?

Development Scenarios and Sensitivity Testing
Response.

Chapter 11

38. In due course this chapter will set the results of the appraisals and consideration of residential development.

Chapter 12

39. In due course this chapter will set out the findings and recommendations.

Thank you for your assistance with this consultation. Please return this questionnaire (or other response) to LocalPlan@enfield.gov.uk by midday on 31st March 2021.