



**EXAMINATION OF THE CITY OF YORK LOCAL PLAN
2017-2033**

PHASE 3 HEARINGS

**MATTER 10: HOUSING MIX AND DENSITY (POLICIES H2, H3, H4
AND H9)**

**APPENDIX 2: CYC Local Plan Viability Technical Note on
Accessible Home Standards**

CITY OF YORK COUNCIL STATEMENT

Technical Note

CYC Local Plan Viability Technical Note on Accessible Home Standards

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Quality Statement: In preparing this Technical Note, the authors have acted with objectivity, impartially, without interference and with reference to all appropriate available sources of information. No performance-related or contingent fees have been agreed, and there is no known conflict of interest in advising the client group about the viability of the proposed CYC Local Plan.

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Introduction

1. This Technical Note assesses the viability implications of the Local Plan under changes that have occurred since document CD018 - City of York Local Plan Viability Assessment Update Study (April 2018) and Local Plan Examination Matter 6 Document HS/P2/M6/IR/1b App 2 City of York Council (29 Mar 2022) have been produced. It relates specifically to reviewing and testing the new ICENI Local Housing Need draft report¹ (herewith referred to as the draft LNA) suggested requirements for wheelchair 'accessible homes'.
2. The draft LNA at paras 6.71 to 6.77, considers the need for better accessibility standards within new build housing. In particular, the report considers the requirement for properties to meet the needs of wheelchair users defined as meeting M4(3). The draft LNA, in Table 6.12, estimates the following need between 2021-33 for 'wheelchair user homes' by tenure:
 - Market homes: 9% of the total market homes are wheelchair accessible; and
 - Affordable homes: 25% of the total affordable homes are wheelchair accessible.
3. In meeting this standard, the draft LNA notes that the likelihood of delivering to accessible standards vis-a-vis viability impacts on developers, and suggests that developers would be more likely to build market homes to M4(3)A (adaptable) standards, which is slightly cheaper, while affordable housing should be built to meet M4(3)B (accessible), partly because local authorities only have the right to request M4(3)B accessible compliance from homes for which they have nomination

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rights.

¹ Saved as file in Housing Mix folder: 'LHNA Draft Report'.

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Viability Testing Revisions

4. The testing in this note follows the same approach and methodology as followed in CD018. It also uses the same assumptions tested in CD018 and Matter 6 Document HS/P2/M6/IR/1b App 2, except where it is noted in this report.
5. We have revised the Local Plan viability testing based on amending Policy H3 Balancing the Housing Market, to account for the draft LNA requirements for accessible homes, as noted above.
6. As such, the typologies and development assumptions remain the same as previously tested in HS/P2/M6/IR/1b App 2 City of York Council but with an additional category of housing types to account for meeting the 'accessible homes standard'.
7. Also, as noted in the draft LNA para 6.73 and 6.74, the Government is currently consulting on an option to require that all new residential dwellings meet the M4(2) accessible standards, which is generally considered to be lifetime homes standard². At the time of reporting, the outcome of the Government's decision is not yet known, however, the testing below covers two scenarios as follows:
 8. Scenario 1 tests the following proportions of accessible homes:
 - 9% of the total market homes are being built to M4(3)A accessible standard; and
 - 25% of the total affordable homes are being built to M4(3)B accessible standard
 - All remaining units are built as 'standard' homes.
 9. Scenario 2 tests the following proportions of accessible homes:
 - 9% of the total market homes are being built to M4(3)A accessible standard;
 - 25% of the total affordable homes are being built to M4(3)B accessible standard; and
 - All remaining units are built to meet M4(2) standard homes.
10. The draft LNA Table 6.13 identifies the additional costs from an EC Harris report for meeting the process and adaption costs³, which have been averaged across housing and then flats and rounded as follows:
 - M4(2): £925 per flat, £525 per house;
 - M4(3)(A) Adaptable: £7,750 per flat, £10,200 per house; and
 - M4(3)(B) Accessible: £7,900 per flat, £22,700 per house.
11. Meeting this policy might also require additional floorspace to accommodate such specialised categories of homes. **Table 1** overleaf shows the average sizes for 'standard' housing types that have been tested in CD018 and Matter 6 Document HS/P2/M6/IR/1b App 2. It then shows the average sizes for unit types built to M4(2) and M4(3). Where more floorspace is required in meeting the higher size standards compared with the normal floorspace, the additional

² Raising accessibility standards for new homes, a consultation paper, page 10.

³ EC Harris, 2014.

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floorspace is applied at a cost in the BCIS psm costs identified in the original viability report and no additional revenue.

Table 1 Floorspace assumptions for tested M4 (2) & M4 (3) units

Unit type	Tested 'standard' sizes (GIA)	M4 (2)		M4 (3)	
		Sizes	Additional floorspace	Sizes	Additional floorspace
Flats	62.9	65.9	+3.0	80.0	+17.1
2 bed house	74.5	82.5	+8.0	104.0	+29.5
3 bed house	93.0	102.0	+9.0	126.3	+33.3
4+ bed house	117.1	126.0	+8.9	154.3	+37.2

Source: Derived from NSS Technical Standards (see **Appendix A** in this report)

Viability Testing Results

12. Based on the noted changes to the viability testing assumptions, this section reviews the viability results to identify and assess the risk to the future delivery of housing within the City. The site typologies and strategic sites have been retested at full Local Plan policy with changes to the housing mix to include 'accessible homes', while everything else is kept the same as previously tested in HS/P2/M6/IR/1b App 2 City of York Council. However, it should be noted that the strategic sites are tested with lower quartile build costs applied to the tested strategic sites, and the housing mix reflects the requirements that have been identified in the latest draft LNA (2022).
13. The results are summarised by using a RAG 'traffic light' system, as follows:
 - Green means that the development is viable with financial headroom that could be used for further planning gain;
 - Amber is marginal in that they fall within a 20% range (i.e., 10% above or below) around the benchmark land value; and
 - Red means that a viable position may not be reached if required to be policy compliant and all other assumptions such as land value remain unchanged.

Viability Results

14. The viability results at full policy requirements for the changes to the housing mix to include 'accessible homes' are shown in **Table 2**.
15. The results are summarised by using a RAG 'traffic light' system, as follows:
 - Green means that the development is viable with financial headroom that could be used for further planning gain;
 - Amber is marginal in that they fall within a 20% range (i.e., 10% above or below) around the benchmark land value; and
 - Red means that a viable position may not be reached if required to be policy compliant and all other assumptions such as land value remain unchanged.

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16. The viability appraisal results for the site typologies shown in **Table 2** show that the average available headroom would fall to account for the additional costs, but the vast majority of the tested sites could move to introduce M4(3)A and B and still be able to comply with the existing CYC Local Plan policies under scenario 1. As such, this would be unlikely to generate a significant burden to undermine the delivery of the bulk of new homes and therefore would be unlikely to put the emerging CTYC Local Plan at risk.
17. But the results also show that three strategic sites would become unviable, and so there may be a requirement for some flexibility in the policy ask to avoid undermining their delivery.
18. Under Scenario 2, where the Government may set a policy requiring all new housing to be built to M4(2) standards except for those required to meet M4(3), the results indicate that this is still unlikely to change the viability of the bulk of sites to be unviable. But a couple of site typologies and one strategic site would become marginal in terms of viability, and an additional strategic site, SS12 Land West of Wigginton Rd (ST14), would become unviable. As such, the combination of these standards may require some flexibility in the policy ask to avoid undermining the delivery of the emerging CYC local plan.

Table 2 CYC Local Plan viability tested with revised assumptions at full policy, along with headroom per dwelling

ID	Typology	Viability and headroom per dwg	
		Scenario 1	Scenario 2
1	Centre/ City Centre Extension - Large - 95 dwellings - Greenfield	£10,988	£6,103
2	Centre/ City Centre Extension - Medium - 50 dwellings – Greenfield	£12,379	£7,457
3	Centre/ City Centre Extension - Small - 20 dwellings – Greenfield	£19,778	£14,806
4	Urban - Large - 45 dwellings – Greenfield	£22,021	£11,290
5	Urban - Medium - 25 dwellings – Greenfield	£22,046	£11,289
6	Urban - Small - 10 dwellings – Greenfield	£26,309	£13,067
7	Suburban - Large - 140 dwellings – Greenfield	£9,230	–£1,314
8	Suburban - Medium - 38 dwellings – Greenfield	£16,874	£6,144
9	Suburban - Small - 8 dwellings – Greenfield	£21,530	£8,253
10	Village - Village - 122 dwellings – Greenfield	£10,591	£22
11	Village - Large - 33 dwellings – Greenfield	£18,535	£7,777
12	Village - Medium - 7 dwellings – Greenfield	£22,311	£9,006
13	Village - Small - 1 dwellings – Greenfield	£6,687	–£9,115
14	Centre/ City Centre Extension - Large - 95 dwellings – Brownfield	£21,501	£16,540
15	Centre/ City Centre Extension - Medium - 50 dwellings –	£22,976	£17,977
16	Centre/ City Centre Extension - Small - 20 dwellings – Brownfield	£24,544	£19,494
17	Urban - Large - 45 dwellings – Brownfield	£23,606	£12,660
18	Urban - Medium - 25 dwellings – Brownfield	£25,274	£14,301
19	Urban - Small - 10 dwellings – Brownfield	£20,915	£7,672

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ID	Typology	Viability and headroom per dwg	
		Scenario 1	Scenario 2
20	Suburban - Large - 140 dwellings – Brownfield	£16,553	£5,796
21	Suburban - Medium - 38 dwellings – Brownfield	£18,304	£7,359
22	Suburban - Small - 8 dwellings – Brownfield	£14,834	£1,493
23	Village - Village - 122 dwellings – Brownfield	£16,609	£5,828
24	Village - Large - 33 dwellings – Brownfield	£18,634	£7,660
25	Village - Medium - 7 dwellings – Brownfield	£14,836	£1,315
26	Village - Small - 1 dwellings – Brownfield	-£3,072	-£18,874
32	SS4 York Central (ST5)	-£2,227	-£6,417
33	SS6 British Sugar (ST1)	£38,626	£29,888
34	SS7 Former Civil Sports Ground (ST2)	£13,084	£4,220
35	SS8 Land Adj Hull Road (ST4)	£13,201	£4,153
36	SS9 Land East of Metcalf Lane (ST7)	£14,089	£5,711
37	SS10 Land Nth of Monks Cross (ST8)	£10,735	£2,122
38	SS11 Land Nth of Haxby (ST9)	£9,101	£567
39	SS12 Land West of Wigginton Rd (ST14)	£4,758	-£3,620
40	SS13 Land West of Elvington Lane (ST15)	-£7,596	-£15,945
41	SS14 Terry's Extension Sites	£42,045	£32,814
42	SS15 Nestle South (ST17)	-£3,001	-£7,298
43	SS16 Land at Tadcaster Rd (ST21)	£23,160	£14,014
44	SS17 Hungate (ST32)	£34,694	£29,770
45	SS18 Station Yard, Wheldrake (ST33)	£17,342	£8,197
46	SS20 Imphal Barracks (ST36)	£29,440	£20,557

Conclusions

- Based on the findings in this technical note, we would conclude that updating the housing mix to meet the draft LNA requirements for more accessible homes should be deliverable by the bulk of future sites coming forward with new housing. However, some flexibility in the policy ask may be necessary for three strategic sites to avoid undermining their delivery.
- Should the Government also set a policy that will require all new dwellings to meet the minimum standard of M4(2) lifetime homes, then this along with any local policy requirements for accessible homes, as tested above, would have a potential impact on some of the strategic sites, so that flexibility in the policy ask becomes necessary for the strategic sites to avoid undermining the delivery of the emerging CYC local plan.

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Appendix A1

Review of Minimum NDSS & Accessible Units

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NSS Minimum Size Standards

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings
1b	1	39		
	2	50	58	
2b	3	61	70	
	4	70	79	
3b	4	74	84	90
	5	86	93	99
	6	95	102	108
4b	5	90	97	103
	6	99	106	112
	7	108	115	121
	8	117	124	130
5b	6	103	110	116
	7	112	119	125
	8	121	128	134
6b	7	116	123	129
	8	125	132	138

Source: derived from the Technical housing standards – nationally described space standard, Department for Communities and Local Government, March 2015

M4(2) Size Assumptions

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings
1b	1	41		
	2	52.6		
2b	3	64	78	
	4	73	87	
3b	4	77.5	93	99
	5	90.5	102	108
	6	99.5	111	117
4b	5	95	106	113
	6	104	115	122
	7	113	124	131
	8	122	133	140
5b	6	108.5	120	126
	7	117.5	123	135
	8	126.5	138	144
6b	7		133	140
	8		142	149

Source: derived from the Housing Standards Review Illustrative Technical Standards Developed by the Working Groups for the Department for Communities and Local Government, August 2013

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M4(3) Size Assumptions

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings
1b	1	50.3		
	2	63.2		
2b	3	76.2	99	
	4	90.3	109	
3b	4	95.8	116	117
	5	108	127	128
	6	117.9	136	138
4b	5	113.5	132	133
	6	123.4	142	144
	7	133.4	152	154
	8	143.4	162	164
5b	6	128.9	147	149
	7	138.9	151	159
	8	148.9	167	169
6b	7		163	164
	8		173	174

Source: derived from the Housing Standards Review Illustrative Technical Standards Developed by the Working Groups for the Department for Communities and Local Government, August 2013

