

## SUMMARY OF CONSULTATION RESPONSES

Organisation	Comment
<b>Issue: Timescale for comment</b>	
Carter Jonas DTZ Commercial Estates Group	The relatively short time period allowed for the review and comment of a large and complex document in the middle of the holiday season was unrealistic and unreasonable.
<b>Issue: Report presentation, complexity, length, grammatical errors</b>	
DTZ Carter Jonas Dacres Barratt Homes	Concern that the report is lengthy and overly technical and would benefit from an Executive Summary with a number of typographical and grammatical errors
<b>Issue: The assumed range of market values (£/Sqft)</b>	
DTZ Carter Jonas Commercial Estates Group Persimmon Homes Hallam Land Management Barratts	<p>The value ranges assumed are too high (£186/Sqft) to £372/Sqft) – even in the height of the market values of £350/sqft were difficult to achieve. The EVA suggests that the study is based on asking prices and whilst it makes reference to the difference between asking and actual sale price it fails to fully explore and take in to account this difference.</p> <p>The assumption that a 4 bed house will total 100sq m is unrealistic. A more usual floor space is 1,200 sq ft to 1,400 sq ft. This is important otherwise Figure 2 suggests higher values can be achieved than is the case.</p>
<b>Issue: Taking account of abnormal costs</b>	
Carter Jonas DTZ Persimmon Homes Hallam Land Management	The study does not make an assumption for abnormal costs which undermines robustness and in addition it fails to accurately conclude that on site specific viability appraisals abnormal costs can make a significant impact to affordable housing delivery.
<b>Issue: Cost Assumptions (planning obligations, build costs, Code for Sustainable Homes)</b>	
Hallam Land Management Persimmon Homes Barratts Commercial Estates Group	The upper range of S106 cost assumptions should be assumed more realistic and even these are considered to under the typical amounts that will be required to be paid, particularly for larger schemes. The costs assumed for the impact of Code for Sustainable homes underestimate the actual costs; reference should be made to the 2008 CLG report on costs. Build costs suggested for flats is too low and should be in the order of 1,250 per Sq m.
<b>Issue: Developers Profit</b>	
DTZ Commercial Estates Group Barratts Persimmon Homes Hallam Land Management	The assumed level of developer profit at 17.5% is too low in the current market and values of 20-25% would be more realistic
<b>Issue: Assumed land values to secure release of land</b>	
Carter Jonas DTZ Commercial Estates Group Dacres Barratts Persimmon Homes Hallam Land Management	The report suggests that land values of £100k to 500k per hectare would be sufficient to incentivise the release of a site. This is considered to be too low and will result in land not coming forward and fails to understand landowner expectations.
<b>Issue: Use of notional sites (size, mix, densities)</b>	
Carter Jonas DTZ	Only schemes up to 100 dwellings have been looked at, and 10 out of the 12 schemes are in the smaller range (2-25 dwellings). This does not

Commercial Estates Group Barratts	adequately reflect the range of strategic sites and likely housing supply emerging from the Sites & Policies DPD. The upper end of the density range (100 dwellings) is unrealistic in this market where developers are looking for reduced densities. Densities of below 25 should have been modelled. The failure to use actual sites for the assessment is a flaw.
<b>Issue: Key Recommendations (targets, thresholds, tenure mix)</b>	
DTZ Carter Jonas Commercial Estates Group Persimmon Homes Hallam Land Management	Concern expressed that the suggested target of 40% has not been fully justified and that further work should be done at 30% and 35% targets as the evidence does not fully support the assertion that 'a target of 30% would not represent a suitable strategic position'  Further consideration should be given to the impact of affordable housing tenure mix on viability.
<b>Issue: The work is out of date</b>	
DTZ	The majority of assumptions were formulated in 2009. The report has taken in excess of 12 months to publish which means that a number of assumptions are out of date at the time of publication. Consideration should be given to up dating various elements of it prior to publication
<b>Issue: Overall Approach</b>	
Commercial Estates Group	Broadly support the approach and welcome references to the need for the Council to take a pragmatic approach throughout the document.  Object to references being made to the Council's current approach since this has no sound basis. Equally the examples of successful delivery at para 2.1.8 are misleading as they relate to sites of less than 10 dwellings and were started or completed in more buoyant times and are not representative of the Council's strategic housing supply  Reference to RSS at para 1.1.10 should be removed as it has been revoked.
<b>Issue: Example Schemes cited</b>	
Barratts	Para 2.1.8 identifies the type of scheme the EVA is primarily concerned with. These are small sites and are entirely untypical of larger, modern housing developments
<b>Issue: Availability of Grant</b>	
Barratts Persimmon Homes Hallam Land Management	The report acknowledges that it is not possible to predict the availability of grant funding and also suggests that some RSLs have been able to pay the envisaged transfer prices without grant – whilst this may be the case, it is short term. We would therefore question whether a nil approach to grant has been fully factored in.
<b>Issue: Reference to the current approach and relationship to consultants findings</b>	
Barratts	By including reference to the Council's existing approach by way of background it appears that the Consultant's findings have been heavily influenced by the Council's previous (unproven) approach rather than leave the consultant to research their own findings