

# Stoke-on-Trent Housing Delivery

784-B071599

## Housing Action Plan

Final

Stoke-on-Trent City Council

April 2025

Document prepared by Tetra Tech Limited.



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## Acronyms/Abbreviations

Acronyms/Abbreviations	Definition
HDT	Housing Delivery Test
LHN	Local Housing Need
5YHLS	Five Year Housing Land Supply
DLUHC	Department of Levelling Up, Housing and Communities

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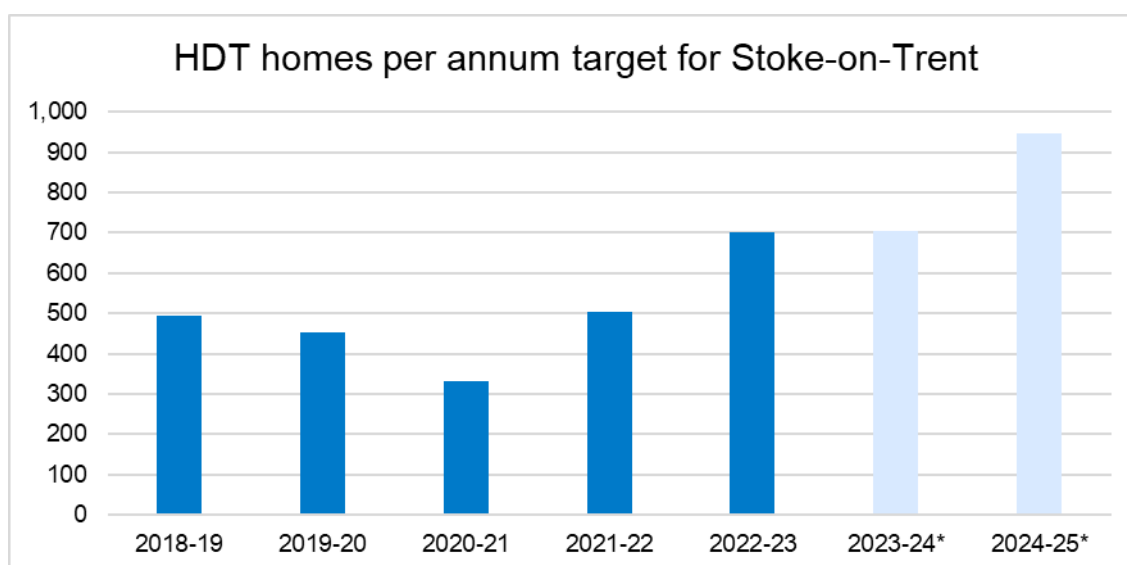
## 1.0 Introduction

### 1.1 Housing Delivery Test

- 1.1.1 The Housing Delivery Test is an annual measurement of housing delivery in the area of relevant plan-making authorities. It is published annually by the Ministry of Housing, Communities and Local Government (MHCLG) (previously by the Department of Levelling Up, Housing and Communities (DLUHC)). The percentage of homes delivered is derived from the total net homes delivered over 3 year period divided by total number of homes required over 3 year period.
- 1.1.2 The National Planning Policy Framework (NPPF, 2024) states that where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years (paragraph 79).
- 1.1.3 Housing Delivery Test (HDT) results for 2023, which were published by MHCLG on 12 December 2024, show that the City of Stoke-on-Trent (“Stoke-on-Trent”) delivered 91% of their housing target, or 1,397 homes over three years compared to the target of 1,536 homes.
- 1.1.4 Further detail is set out in the Planning Practice Guidance (paragraph 039) which states that an Action Plan should:
- Identify the reasons for under-delivery;
  - Explore ways to reduce the risk of further under-delivery; and
  - Set out measures the authority intends to take to improve levels of delivery.
- 1.1.5 The PPG also states that, to ensure the document is as useful as possible, local planning authorities will need to publish an action plan within 6 months of publication of the Housing Delivery Test measurement (paragraph 044). The Council is therefore required to publish an Action Plan by 12<sup>th</sup> June.

### 1.2 Stoke-on-Trent housing targets

- 1.2.1 The NPPF (paragraph 78) states that the five year housing supply for each local authority should be set out against the strategic requirement in adopted strategic policies or against their 'Local Housing Need' (LHN), where the adopted strategic policies are more than 5 years old. The strategic policies for Stoke-on-Trent are set out within the Core Spatial Strategy which was adopted in October 2009, and has not since been reviewed. Therefore, the housing target for Stoke-on-Trent is set by the Council's "minimum" LHN figure.
- 1.2.2 The standard method for calculating the LHN has been revised a number of times over the last five years, which has led to a step change in the LHN for Stoke-on-Trent.
- 1.2.3 Stoke-on-Trent's housing target has increased significantly in recent years, as the chart below shows. From a target of 494 dwellings per annum in 2018-19, this number stayed fairly consistent until 2022-23 when it increased by 42% to 700 dwellings per annum, due to the addition of a 35% uplift for the top urban areas. For future years, (ie. from 2024-25) a new Standard Method has been introduced with the revised National planning Policy Framework in 2024, increasing the target using the new Standard Method significantly once more to 948 dwellings per annum (an increase of 35%). This is the target to be assessed in the 2024-25 HDT results when they are published at the end of 2025.



*\*HDT targets and results for 2023-24 and 2024-25 have not yet been published.*

- 1.2.4 Please note that the HDT target does not always exactly match the LHN figure, as the two have variations on the calculations which can change in each year, for example the special calculations that were used to reflect the impacts of the COVID pandemic.

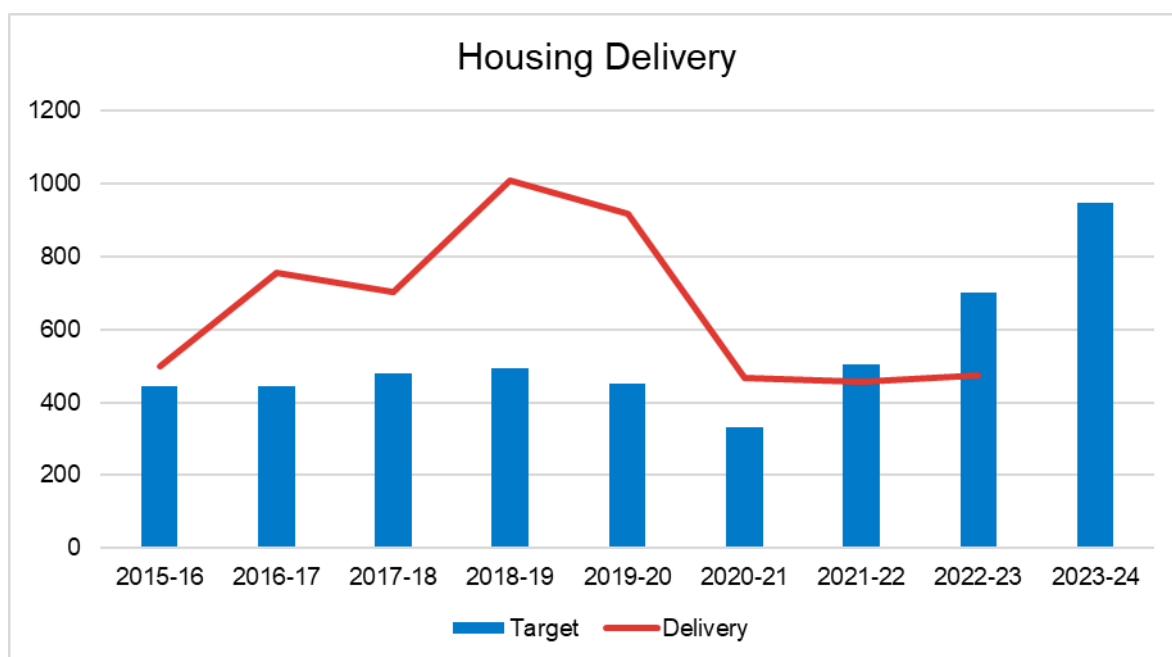
### 1.3 Stoke-on-Trent housing delivery

- 1.3.1 The 2024 Housing Delivery Test assesses housing delivery against the years 2020-21, 2021-22 and 2022-23. The results are set out below.

	2020-21	2021-22	2022-23	Total
Number of homes required	333 <sup>1</sup>	503	700	<b>1,536</b>
Number of homes delivered	468	455	473	<b>1,397</b>
Shortfall	+135	-48	-227	<b>-139</b>

- 1.3.2 The table above shows that housing delivery in the three years remained fairly stable, while the target increased significantly across the period. This has reversed the over-delivery in 2020-21 and led to a shortfall of 139 homes (9%) across the period.
- 1.3.3 An assessment of housing delivery across previous years shows that the years 2018 to 2020 had particularly high delivery, with strong delivery in excess of targets every year from 2015 to 2021. The reasons for this are explored in further detail in Section 3 of this report.

<sup>1</sup> The housing target for the year 2020-2021 was adjusted to reflect just an 8 month period to allow for the effects of the national lockdown in 2020.



- 1.3.4 Looking to the future, the housing targets for Stoke-on-Trent have increased significantly once more with the introduction of the new standard method in December 2024, as set out above. Consideration of this will be factored into this Action Plan.

## 1.4 Housing Delivery Action Plan

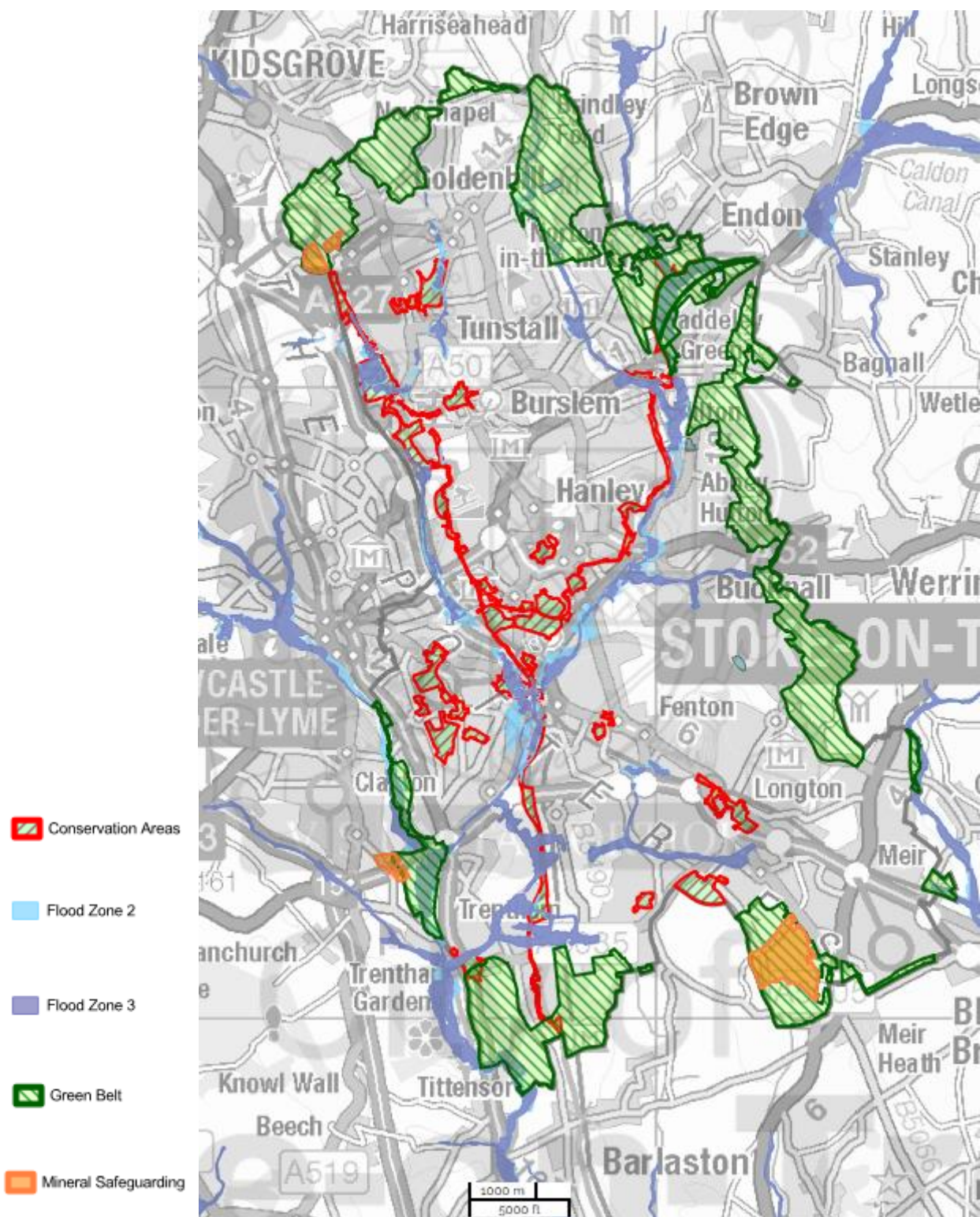
- 1.4.1 While there is no standard format for an Action Plan, this report follows the guidance set out in the PPG to review the reasons for under-delivery and to explore appropriate measures to rectify this.
- 1.4.2 The Action Plan is set out in the following sections:
- An overview of the context, including a review of key features of Stoke-on-Trent and the Local Development Framework.
  - An analysis of housing delivery, including a review of housing sites and housing delivery in Stoke-on-Trent.
  - Key challenges identified facing housing delivery.
  - Ongoing and suggested actions to improve housing delivery.
  - Monitoring actions and delivery going forward.



## 2.0 Context

### 2.1 Stoke-on-Trent

- 2.1.1 Stoke-on-Trent is, in reality made up of 'six towns' – Hanley, Stoke, Tunstall, Burslem, Fenton and Longton which form the polycentric City of Stoke-on-Trent.
- 2.1.2 Stoke-on-Trent saw population decline in 1970s to 2000s, caused by the decline of key industries in the region. The population is now once again increasing. Projections (based on 2018 mid-year population estimates) suggest that population in Stoke-on-Trent will rise to c.272,462 by 2043 (a rise of 6.5% - or 16,629 persons). This change compares with an estimated 10.3% increase expected across England over the same period.
- 2.1.3 The economy of this area was historically reliant upon the ceramics industry. The decline of the ceramic industry in particular throughout the latter half of the twentieth century has had significant impacts on the environment, socio-economics and landscape of the area.
- 2.1.4 As the map below shows, Stoke-on-Trent is bounded to the northern, eastern and southern borders by parcels of Green Belt.



Stoke on Trent Planning Constraints Map

## 2.2 Local trends

- 2.2.1 Stoke-on-Trent has a population of around 263,000 people. The closure of many of the key industries that the area traditionally relied upon in the last half of the 20<sup>th</sup> Century have significant impacts for the local population, and some indices of deprivation remain evident.
- 2.2.2 The table below highlights key trends, including a higher rate of economic inactivity than across Great Britain as a whole (23.1% compared to 21.4%), although this has reduced from 24.3% economically inactive in Stoke-on-Trent in 2022.
- 2.2.3 Stoke-on-Trent has a higher proportion of claimants of out of work benefits and lower average earnings than national average across Great Britain – 6.2% compared to a national average of 3.9%. This figure has increased from 5.7% in 2023, while the national average has remained stable.
- 2.2.4 Median gross weekly earnings are lower than the national average, at £587 compared to £682 nationally. Between 2022 and 2023, median earnings have increased in Stoke-on-Trent by 6.4%, which is in broadly line with a national average increase of 6.3%.
- 2.2.5 The Council tax bands in England are an indication of the value of a property, with Band A being the lowest value (up to £40,000) and Band H being more than £320,000. Around 60% of properties in Stoke-on-Trent are classified in Band A compared with 23.9% across England. In total 93.5% of Stoke-on-Trent's stock is classified in Bands A-C compared with 67.4% nationally.
- 2.2.6 Life expectancy is lower for both males and females than the national average – 76.3 years for men compared to 79.1 years for men nationally; and 80.1 years for women compared to 83.1 years nationally.

## Stoke-on-Trent Housing Delivery

### Housing Action Plan

Measure	Stoke-on-Trent	Great Britain	Stoke-on-Trent	Great Britain	Notes
	2022	2022	2023	2023	
Population	260,008 (*)		263,157 (#)		Source: ONS Mid-Year Estimates (MYE)  (*) – 2022 MYE released October 2023  (#) - 2023 MYE released July 2024
	2022	2022	2024	2024	
Economically Inactive	24.3% (*) 38,200 persons	21.3%	23.1% (#) 36,500 persons	21.4%	Source: ONS Annual Population Survey  (*) – Jan-Dec 2022 Average  (#) – Apr 2023-Mar 2024 Average
	2023	2023	2024	2024	

## Stoke-on-Trent Housing Delivery

### Housing Action Plan

Measure	Stoke-on-Trent	Great Britain	Stoke-on-Trent	Great Britain	Notes
<b>Out of Work Benefits (Claimant Count)</b>	5.7% (*) 9,210 persons	3.9%	6.2% (*) 10,050 persons	3.9%	Source: ONS (*) – April 2023 (#) – April 2024
	<b>2022</b>	<b>2022</b>	<b>2023</b>	<b>2023</b>	
<b>Median earnings by resident</b>	£552.0 (*)	£642.2	£587.8 (#)	£682.6	Source: ONS Annual Survey of Hours and Earnings – Gross Weekly Pay – All Full-Time workers (*) – 2022 (#) – 2023
	<b>2022</b>	<b>2022</b>	<b>2023</b>	<b>2023</b>	

# Stoke-on-Trent Housing Delivery

## Housing Action Plan

Measure	Stoke-on-Trent	Great Britain	Stoke-on-Trent	Great Britain	Notes
<b>Council Tax Band of properties</b>	(*) A–70,270 (59%)	A – 23.9%	(#) A–70,542 (59%)		Source: VOA, (*) 2022, (#) 2023
	B – 25,080 (21%)	B – 21.8%	B – 25,362 (21%)		
	C – 15,590 (13%)	C – 21.7%	C – 15,737 (13%)		
	D – 5,010 (4%)	D – 14.9%	D – 5,072 (4%)		
	E – 1,910 (2%)	E – 9.9%	E – 1,930 (2%)		
	F – 530 (0.4%)	F – 4.9%	F – 529 (0.4%)		
	G – 200 (0.2%)	G – 2.7%	G – 199 (0.2%)		
	H – 40 (0%)	H / I– 0.2%	H – 40 (0%)		
	<b>2019-2021</b>	<b>2019-2021</b>	<b>2024</b>	<b>2024</b>	

Stoke-on-Trent Housing Delivery

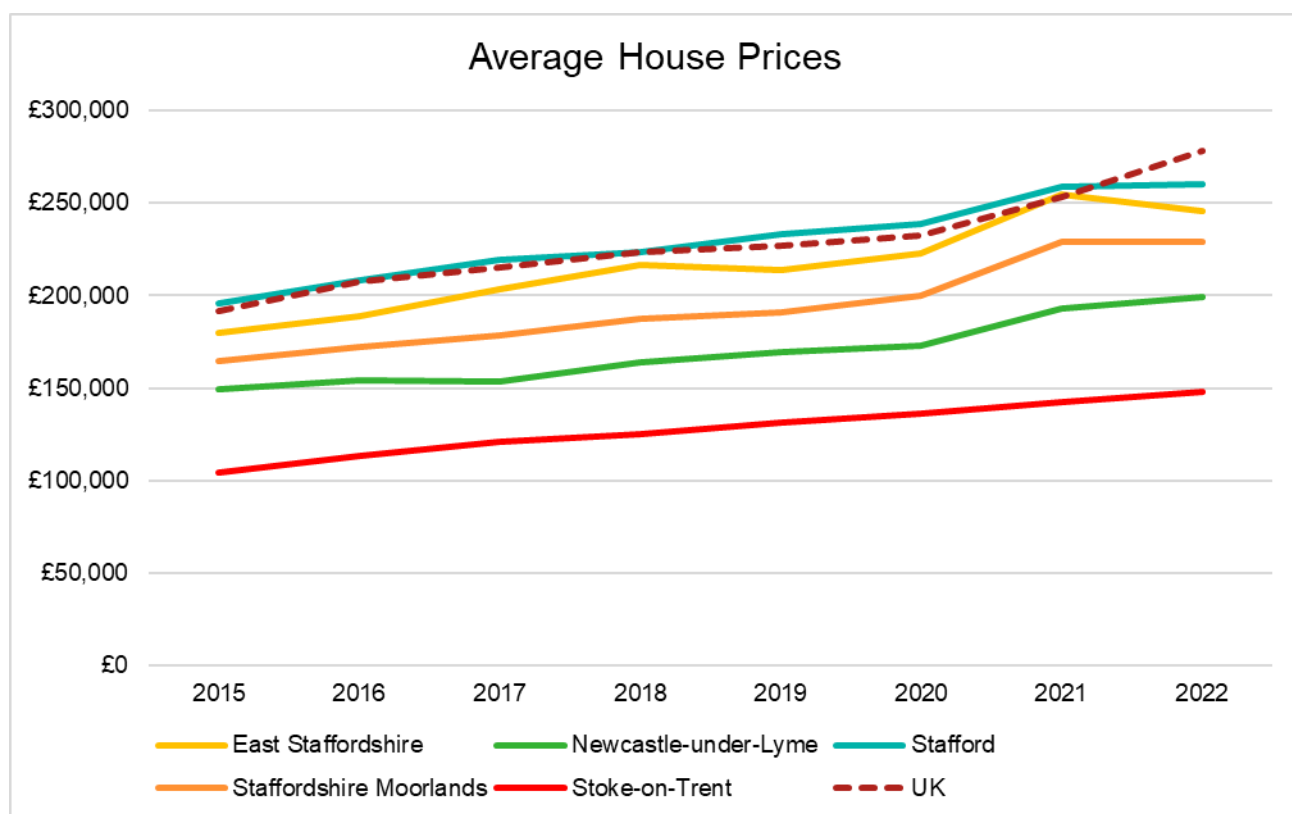
Housing Action Plan

Measure	Stoke-on-Trent	Great Britain	Stoke-on-Trent	Great Britain	Notes
Life Expectancy	(*) 74.6 (Male) 79.2 (Female)		(#) 76.3 (Male) 80.1 (Female)	79.1 (Male) 83.1 (Female)	(*) 2019-21: Source: Public Health England - Rolling three-year average  (#) 2024: Source: ONS data release

## 2.3 House prices

- 2.3.1 A key feature of Stoke-on-Trent's housing market is a historic and continuing trend of low house prices. The chart below shows how Stoke-on-Trent's house price growth compares to surrounding local authorities in the region.
- 2.3.2 Stoke-on-Trent has continually had the lowest mean house prices in the locality. The surrounding local authorities also have average house prices that are generally below the UK average, though Stoke-on-Trent is by far the lowest of these.
- 2.3.3 In 2015, the mean house price in Stoke-on-Trent was £104,000, significantly lower than the next-lowest neighbouring authority of Newcastle-under-Lyme which had a mean house price of £149,123 (ONS, House price statistics for small areas in England and Wales). This compares to the average UK house price in March 2015 of £191,537 – 84% higher than values in Stoke-on-Trent.
- 2.3.4 Over the period from March 2015 to March 2022, average house prices in Stoke-on-Trent have risen by 42%, slightly below the average increase across the UK of 45%. Prices remained below the national and local averages. In March 2022 the average house price had risen to £147,700, almost half the UK average of £278,000.





## 2.4 Current development framework

- 2.4.1 The core document within Stoke-on-Trent's development framework is the Stoke-on-Trent and Newcastle-under-lyme Core Spatial Strategy 2006 to 2026, which was adopted in 2009, and is therefore currently subject to review.
- 2.4.2 There are a number of supplementary planning documents which also make up the framework, including:
- Affordable Housing Supplementary Planning Document
  - Composite Planning Policy List 2014
  - Etruria Valley Enterprise Area Supplementary Planning Document
  - Healthy Urban Planning Supplementary Planning Document
  - Inclusive Design Supplementary Planning Document
  - Newcastle-Under-Lyme and Stoke-On-Trent Urban Design Guidance Supplementary Planning Document
  - Sustainability And Climate Change Supplementary Planning Document

## 2.5 New draft Local Plan

- 2.5.1 Until January 2021 Stoke-on-Trent were working towards a new joint Local Plan with Newcastle-under-Lyme (NUL), for which work began in 2015 and a draft was produced in 2020. This draft plan was never published or consulted on, following the decision to produce separate Local Plans for each Local Authority.
- 2.5.2 In December 2024 NUL submitted a Regulation 19 Local Plan for Examination in Public.
- 2.5.3 Stoke-on-Trent are also working towards their own new Local Plan, with an Issues and Options consultation undertaken in June 2021, along with a Call for Sites. There were also subsequent Call for Sites in 2023 and 2024. Consultation on a Regulation 18 version anticipated in September/ October 2025.

## 3.0 Analysis of housing delivery

### 3.1 Availability of housing sites

- 3.1.1 Stoke-on-Trent has tightly constrained boundaries, characterised by an urban area at the centre with small areas of green belt land around the edge, particularly to the north.
- 3.1.2 As set out in the previous sections of this report, the housing target for Stoke-on-Trent has increased significantly over the past few years, which must also be followed by a step change in the identification of housing sites. The 2023 Five Year Housing Land Supply (5YHLS) report confirms that the increased housing numbers cannot be accommodated within brownfield land, and therefore greenfield sites will be required to meet housing targets.
- 3.1.3 The Draft data for the 2024 5YHLS report (not yet published), identifies only sites that are considered 'deliverable'. This includes:
- Sites with planning permission which have dwellings remaining to complete (either under construction or not started).
  - Sites which do not currently have planning permission, but are identified on the Council's brownfield register as at the base date, where there is evidence through developer engagement and funding opportunities (including Levelling Up and the Homes England partnership) that residential development will be delivered within five years.
- 3.1.4 The Draft 2024 5YHLS identifies 164 sites in total. 59% of the sites deliver 5 units or less, and just 14 sites (8%) deliver over 100 units. These larger sites will deliver 71% of the total housing supply. Of these larger sites, by far the greatest contributor to supply is the development of the former Stoke-on-Trent College (Cauldon Campus) which will deliver 778 new student apartments, or 20% of the total 5YHLS. This skews the data somewhat, making the reliance on larger sites seem greater than it would otherwise be. Without the inclusion of the Cauldon Campus, larger sites are delivering around 40% of the 5YHLS. Overall therefore,

there is a trend towards reliance on delivery of housing through smaller sites in Stoke-on-Trent at present.

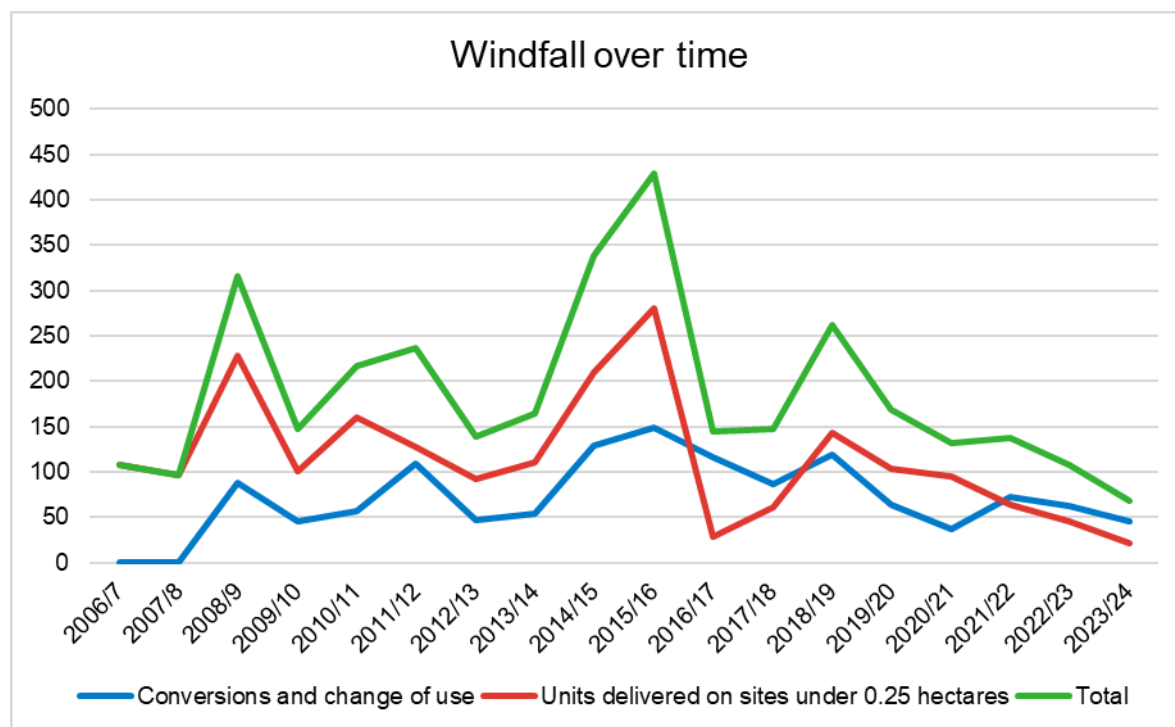
- 3.1.5 The 5YHLS (draft) does not currently show a five year supply of sites. Based on the current target, Stoke-on-Trent has identified 4.02 years of housing land supply.

## 3.2 Type of sites available

- 3.2.1 An analysis has been carried out on the type of housing sites that have been granted permission over the 3 years of the HDT (2020-2023), plus 2023-24.
- 3.2.2 Of the 348 sites identified, 309 sites are under 1ha in size, delivering 2,381 units. The remaining 39 sites over 1ha are anticipated to deliver 2,305 units, once completed. There is therefore a high proportion of the housing supply being delivered by a small number of larger sites.
- 3.2.3 Since 2016, a small number of larger housing sites were granted approval which are now slowly coming to completion. More recently there have been fewer housing units coming forward on these larger more strategic sites.
- 3.2.4 There are relatively few greenfield sites (22), three of which are larger sites delivering over 100 units. This is a trend that is anticipated to change in future years, as the availability of larger brownfield sites is declining, therefore requiring identification of strategic greenfield sites for development.
- 3.2.5 Stoke-on-Trent is home to Staffordshire University and Keele University sits in neighbouring Newcastle-under-Lyme, and therefore delivery of new student accommodation has boosted housing numbers in recent years. There are a number of significant student accommodation developments in the current pipeline, delivering a total of 778 units. Noted that the most significant of these is the development by Staffordshire University on the land off Lordship Lane which will deliver 288 gross new student units, although it will result in a net loss of 5 units overall as the project involves the demolition and reconfiguration of existing units.
- 3.2.6 There have been 2-3 years of significant approvals of new student accommodation, following the decision by Staffordshire University to move a campus to Stoke-on-Trent. The inclusion of such units in the housing supply for

Stoke-on-Trent has been tested at appeal, whereby the Inspector concluded that it was appropriate to count student accommodation in the supply. More recently, permission for new student accommodation has begun to taper off and there are fewer of these larger student developments anticipated to come forward in future years.

- 3.2.7 As Stoke-on-Trent currently do not have any allocated sites, the windfall allowance is counted as those sites that would not meet SHELAA parameters ie. conversions and change of use, and sites of 0.25ha or less. The historic windfall figures since 2006/7 show an average annual delivery of 71 units through conversions/ change of use, and 115 units on sites of 0.25ha or less – a total 187 units per annum.

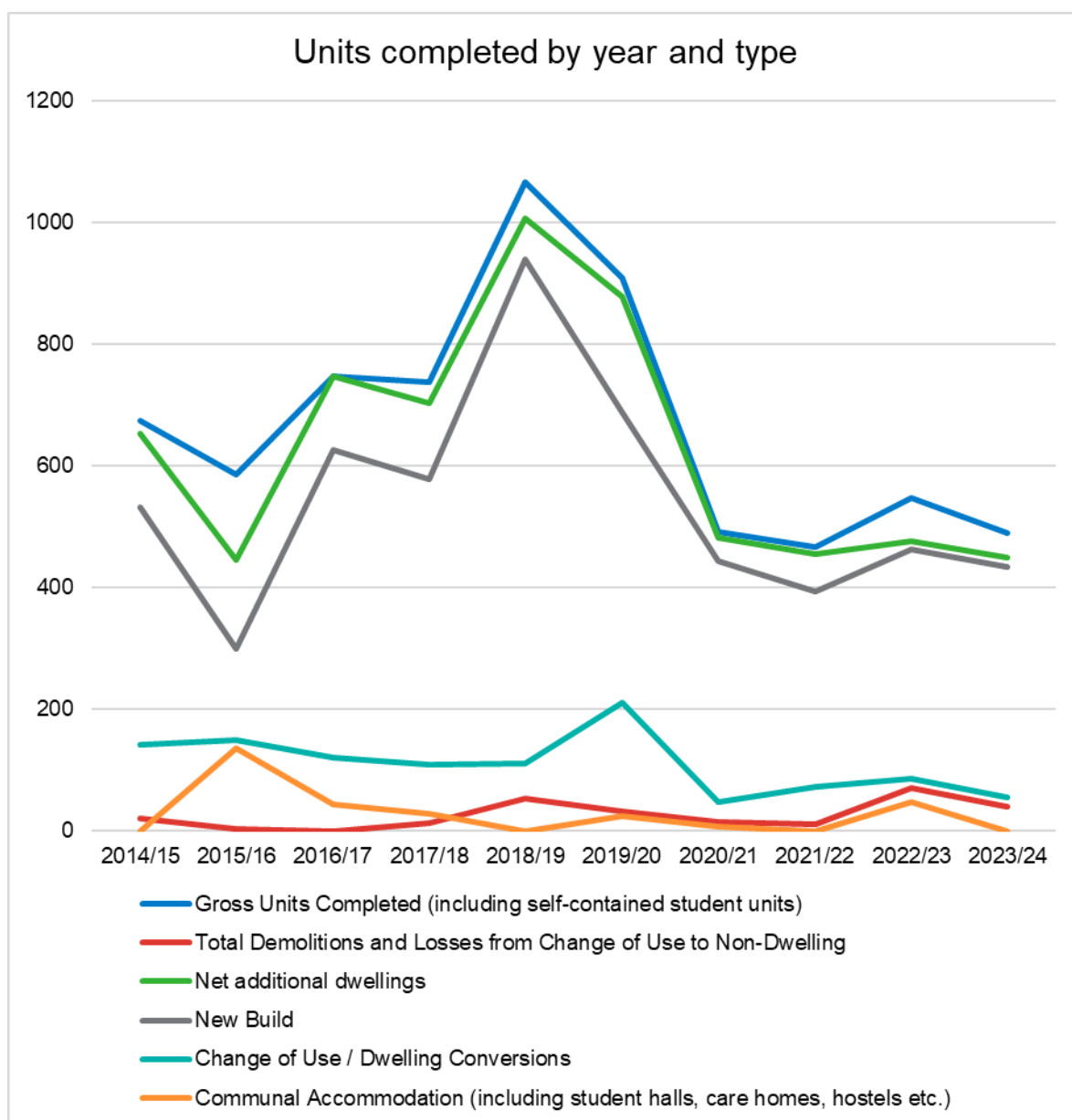


- 3.2.8 This windfall delivery over time shows a relatively high number of units being delivered on such sites. This is due to the nature of the local area, with fewer large brownfield sites available but a higher number of smaller ‘infill’ plots within the urban area being brought forward.
- 3.2.9 The chart above shows that the number of windfall units varies each year and has experienced a number of peaks and troughs over time. While trends are therefore

hard to ascertain, there has been recent decline of over 50% in the number of units coming through via these windfall sites since 2017/18. This could signify that the availability of such sites may be decreasing as urban brownfield land in many areas reaches capacity.

### **3.3 Delivery of housing**

- 3.3.1 An analysis of the housing completions and units under construction from annual monitoring between 2014-2024 is set out below. For units under construction, these may not have started in that monitoring year.
- 3.3.2 The chart below shows that constructions reached a peak in 2018/19, and have reduced significantly since this date. The sharp reduction in 2020 is likely reflective of the COVID 19 pandemic and the impact of numerous lockdowns on construction. However, the pace of construction has not recovered to pre-pandemic levels in the following years.

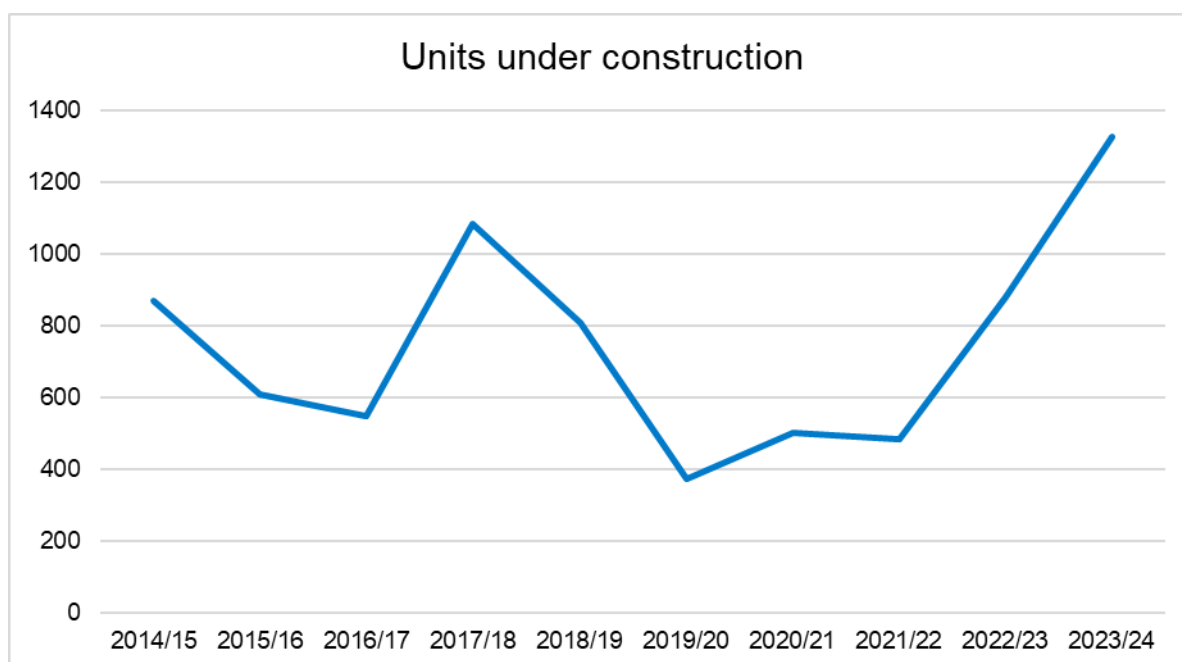


3.3.3 The chart shows that the additional dwellings are driven by new build units, which accounted for between 84% and 90% of all new units since 2020. Prior to this, there were slightly higher numbers of units brought forward by changes of use and conversions.

3.3.4 Communal accommodation, including student halls, care homes and hostels etc also boosted unit numbers at times, with a trend of decline over the ten-year period.

3.3.5 An average of 25 units per year is lost to demolition and conversions, although this number varies significantly year on year.

3.3.6 The number of housing units completed are likely to increase in the coming years as the units currently under construction reach completion. The chart below shows an uptake in units under construction from 2022 onwards. This is due to a small number of large sites that are currently under construction. They include a number of flatted developments, such as the former Stoke Police Station (177 student accommodation units) and the Goods Yard (174 units), which are constructed together rather than across phases.



## 3.4 Lapsed permissions

3.4.1 It is noted through annual monitoring that there is a historically high rate of planning permissions for dwellings lapsing within Stoke-on-Trent. Since 2009, this has accounted on average for 19% of units approved. The lapse rate of 19% appears to be high in comparison to surrounding boroughs, which have used a lapse rate of around 10% or less in their 5YHLS calculations.

3.4.2 An analysis of lapsed permissions since 2020 identified 363 units across 28 sites where permission has now lapsed.



- 3.4.3 Of these sites, 23 sites were for minor development of under 10 units, totalling 58 units (16% of the total lapsed). A further 3 sites had approval for 10-40 units, totalling 68 units (19% of the total lapsed).
- 3.4.4 Significantly, recently lapsed permissions include development at Glass Street/South of Hillchurch Street, which was approved in November 2020 for 220 build to rent residential units. In this instance, the developer Empire Development Holdings went into liquidation in November 2024.

**Table 3.1. Permissions granted 2020-2024 now lapsed**

Planning Application Reference	Site Address	Description	Approval Date	Number of Units
64573	31- 49 Parliament Row and 55 Old Hall Street, Hanley, Stoke-on-Trent, ST1 1PW	Partial demolitions to rear, change of use of first and second floors to create 18 apartments, together with associated elevational alterations including replacement windows and doors	07-Apr-20	18
63206	Ford Green House, Ford Green Road, Smallthorne, Stoke-on-Trent, ST6 8EA	Demolition of outbuildings, conversion of Ford Green House into two dwellings and erection of a further seven dwellings	07-Apr-20	9
64923	44 Jasper Street, Hanley, Stoke-on-Trent, ST1 3DA	Demolition of rear single storey part of building, conversion of existing building to 5 residential units together with elevational alterations to existing building	08-Apr-20	5
64945	Land adjacent to, 56 Lyndhurst Street, Burslem, Stoke-on-Trent, ST6 4BP	Erection of a pair of 2 storey semi detached dwellings	23-Apr-20	2

Planning Application Reference	Site Address	Description	Approval Date	Number of Units
65098	Former St John The Evangelist church, High Street, Goldenhill, Stoke-on-Trent, ST6 5RD	Change of use to recording studio and performance space (Sui Generis) with ancillary residential accommodation and external access ramp	18-May-20	1
65155	2 Buccleuch Road, Normacot, Stoke-on-Trent, ST3 4RF	Demolition of existing garage and erection of two storey residential dwelling	21-May-20	1
65177	Junction of Sneyd Street/Furnival Street, Cobridge, Stoke-on-Trent, ST6 2PG	Residential development (outline)	01-Jul-20	9
65122	Garden of 348 New Inn Lane, Hanford, Stoke-on-Trent, ST4 8JS	Demolition of existing garage and erection of two storey detached residential dwelling	19-Aug-20	1
65446	Flame House, Bagnall Road, Milton, Stoke-on-Trent, ST2 7NE	Hybrid application (part full and part outline). Full planning permission for the demolition of existing buildings. Outline planning permission for residential development with access.	04-Sep-20	2
65107	1 - 3 Kirby Street, Cobridge, Stoke-on-Trent, ST6 2HT	Erection of two residential dwellings	23-Sep-20	2
65545	Garage Site adjacent to 27 Powell Street, Cobridge, Stoke-on-Trent, ST1 5JR	Residential development (outline)	19-Nov-20	1
64665	Land and buildings to the north of Glass Street/South of	Demolition of existing building and erection of 220 Build to Rent residential units (Use Class C3) with ancillary	24-Nov-20	219

Planning Application Reference	Site Address	Description	Approval Date	Number of Units
	Hillchurch Street, Hanley, Stoke on Trent	residential facilities, carparking and landscaping		
64145	19 - 27, Pall Mall, Hanley, Stoke-on-Trent, ST1 1EB	Hybrid application (Part full, part outline). Full planning permission for the demolition of existing buildings. Outline planning permission for residential development (Use Class C3)	01-Dec-20	37
65551	12 Piccadilly, Hanley, Stoke-on-Trent, ST1 1DH	Change of use of upper floors to C4 and associated elevational alterations	02-Dec-20	1
65329	59 Gilman Street, Hanley, Stoke-on-Trent, ST1 3PL	Demolition of existing terrace dwelling and ancillary outbuildings and construction of residential development comprising 7 self contained apartments (C3)	11-Dec-20	7
65858	193 Birches Head Road, Birches Head, Stoke-on-Trent, ST1 6ND	Demolition of existing dwelling and construction of one detached dwelling	16-Dec-20	1
65595	Land Corner of Tregowan Close and Chesterwood Road, Burslem, Stoke-on-Trent, ST6 7EQ	Residential development comprising no.2 detached dwellings with new vehicular access	13-Jan-21	2
65569	48 Malthouse Road, Bucknall, Stoke-on-Trent, ST2 9HY	Residential Development (outline)	11-Feb-21	2
65841	7-11 Piccadilly, Hanley, Stoke-on-Trent, ST1 1DG	Addition of three storeys to existing building, together with the change of use of the first and second floor, to create 18 one and two bed apartments and replacement of all window frames	25-Feb-21	18

Planning Application Reference	Site Address	Description	Approval Date	Number of Units
65887	Land off Hollywall Lane, Sandyford, Stoke-on-Trent, ST6 4QB	Residential development (outline)	03-Mar-21	2
66000	Land off Ubberley Road, Stoke-on-Trent, ST2 0EF	Residential development comprising 13no. dwellings with associated car parking, landscaping, boundary treatments and new vehicular accesses	05-Mar-21	13
65870	165-169 High Street, Tunstall, Stoke-on-Trent, ST6 5EA	Change of use of first and second floors to create eight apartments (use class C3)	19-Mar-21	8
66245	Pauls Haven, Chatterley Road, Tunstall, Stoke-on-Trent, ST6 4PX	Change of use to a residential dementia care home (Use class C2)	24-Mar-21	1
68270	139-141 Uttoxeter Road, Stoke-on-Trent, ST3 1QQ	Change of use of ground floor to 2no. Hot Food Takeaways (Sui Generis), change of use of first floor to 1no. self contained residential apartment, first floor side extension, first floor rear extension, elevational alterations to include 2no. new shop fronts	04-Oct-22	1

### 3.5 Implementation of permissions

- 3.5.1 An analysis has been conducted of the length of time taken in Stoke-on-Trent from consent to work starting on site. The tables below are taken from SHELAA methodology based on historic trends. For larger developments (over 50 units), these tend to be on complex sites with constraints like decontamination and so a lower build out rate is used for the initial year to reflect this.

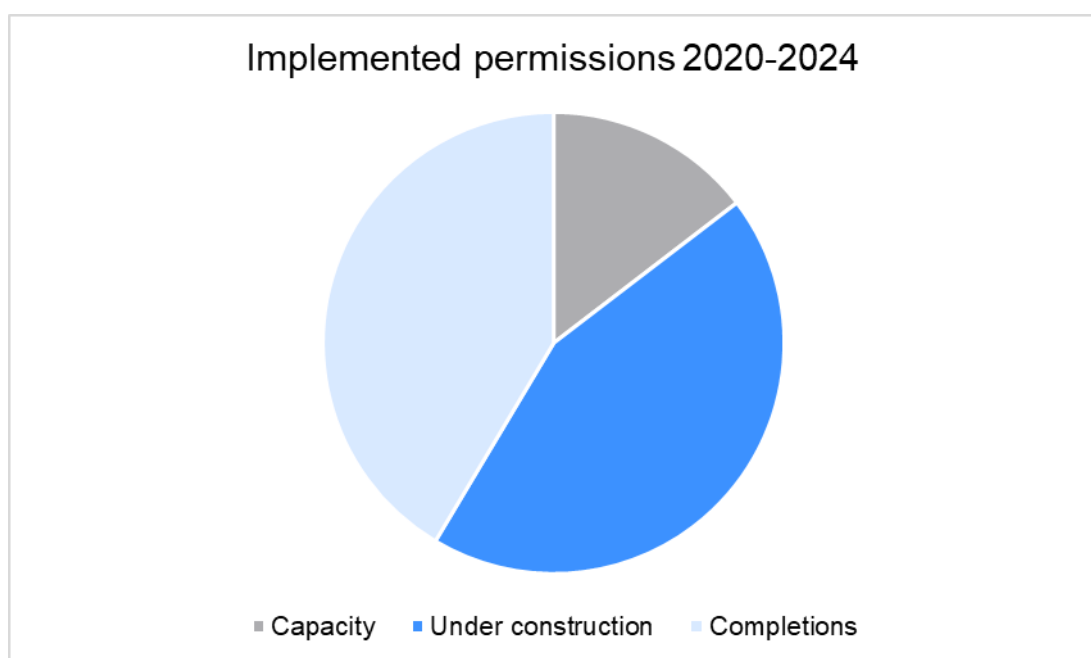
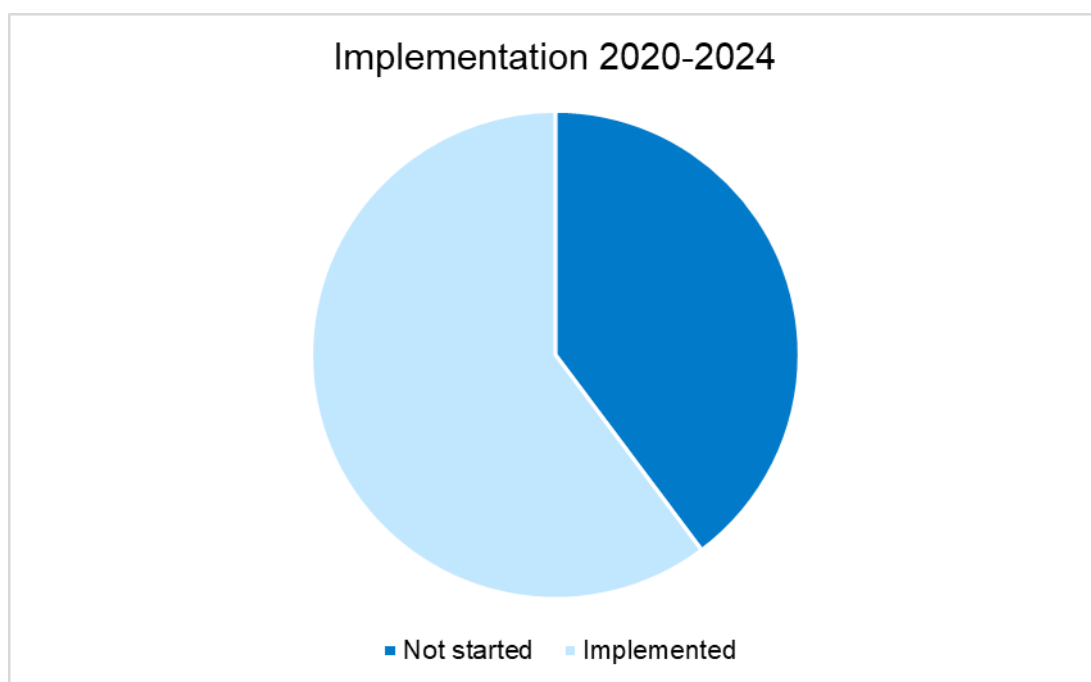
**Table 3.2. Site build out rates**

Site size	Build out rate
Sites of 50 dwellings or more	20 dwellings for the first year, rising to 40 per annum for the subsequent years.
Sites of 16-49 dwellings	20 dwellings per annum
Sites of 5-15 dwellings	5 dwellings per annum

**Table 3.3. Lead in times**

Permission type	Lead-in time
With full planning permission	12 months
With outline planning permission	24 months

- 3.5.2 An analysis has been undertaken of planning permissions granted by Stoke-on-Trent over the over the 3 years of the HDT (2020-2023), plus 2023-24.
- 3.5.3 This shows that 4,686 units were permitted, of which 1,668 (36%) have not yet started construction. Permissions delivering 363 units (8% of total permissions) have now lapsed.
- 3.5.4 Permissions delivering 2,526 of units have so far been implemented, of which 1,095 are under construction and 1,032 have been completed. And a remaining capacity of 364.
- 3.5.5 As set out in Section 3.2, Stoke-on-Trent has a relatively strong supply of smaller windfall sites. Such sites tend to come forward for development faster than larger sites, usually within two years.



## 3.6 Planning process

- 3.6.1 In an analysis of planning applications determined over the 3 years of the Housing Delivery Test (2020-2023), plus 2023-24, the percentage of applications resolved within their target time (ie. before expiry).

3.6.2 Of the applications known:

- **Large Scale Major:** 81% resolved within their target time/ before expiry. The average time taken was 281 days.
- **Small Scale Major:** 89% resolved within their target time/ before expiry. The average time taken was 205 days.
- **Minor:** 82% resolved within their target time/ before expiry. The average time taken was 109 days.

3.6.3 In general, Stoke-on-Trent takes a positive approach to planning applications and seeks to assist appropriate development to achieve planning permission. Planning performance agreements are frequently used to agree suitable timescales for resolution of planning application, reflecting the often complex nature of issues to be resolved which can lengthen agreed timescales for resolution.

3.6.4 An issue that has been identified which can hold up determination of planning applications is the lack of a local validation list in Stoke-on-Trent. Indeed, of applications refused, 50% of these are due to there being insufficient information submitted. Stoke-on-Trent are currently working on a local validation list, which it is hoped will be adopted by Autumn 2025.

3.6.5 Similarly, in an analysis of planning appeals determined over the 3 years of the Housing Delivery Test (2020-2023), plus 2023-24, the percentage of appeals allowed and dismissed were reviewed. It showed that of a total 25 appeals decided in that period, 68% were dismissed. This indicates that in the majority of cases, planning permissions were refused correctly and/or for insurmountable reasons.

## 4.0 Key challenges to housing delivery

- 4.1.0 This section of the report brings together the data analysis covered in the previous sections with qualitative conversations with officers across various departments related to housing delivery at the Council.

### 4.1 Availability of sites

- 4.1.1 As set out in Section 3.1 of this report, the availability of sites for housing delivery is not keeping pace with the increasing housing targets. The current (draft) 5YHLS shows that Stoke-on-Trent has 4.02 years of housing land supply.
- 4.1.2 Supply of land for housing has previously been strengthened by a typically high number of smaller windfall sites coming forward, and by a few large schemes, many of which have been for student accommodation. There are signs that, while the smaller brownfield sites that typically drive the windfall housing delivery are still being identified, these are not being brought forward for development. The reasons for this have not been fully investigated here, but are likely to include the marginal viability of such sites in the face of other rising costs of construction in combination with other barriers such as remediation.
- 4.1.3 The rate of planning permissions lapsing is also high in Stoke-on-Trent compared to surrounding areas. Drivers behind this are likely to be the lower values achieved for new housing in this area; the increased costs associated with often contaminated brownfield sites; and increasing pressures and costs for developers which has led to some going into administration. Permissions on smaller sites may have been achieved by less experienced developers who later decided that the permission did not result in a reasonable profit. There are also instances where developers have achieved planning permissions but then allow the permission to lapse while they hold the land in the expectation that values will gradually rise over time. In such instances, it is common for multiple permissions to be sought over time on these sites.
- 4.1.4 While traditionally there has been a strong focus on delivery through brownfield sites, there is a declining availability of such sites in the urban area as these are



now reaching capacity, particularly for larger more strategic housing schemes. Stoke-on-Trent must therefore seek to identify and allocate strategic greenfield sites if the increased housing targets are going to be met in future years.

- 4.1.5 The council also owns land with the potential for development. Notably there are a number of former school sites which the council are supporting the disposal of, after the sites were left vacant for over a decade.

## **4.2 Developers and types of development**

- 4.2.1 Stoke-on-Trent has a range of developers taking forward development in the area. Planning officers have noted some instances of less experienced developers achieving planning permission only to then step away from schemes with marginal values.
- 4.2.2 Student accommodation has boosted delivery of housing in Stoke-on-Trent for many years. While the build out and completion of student housing schemes will continue to boost this form of housing delivery, it is unclear whether this trend will continue in the medium to long term. Demand for student accommodation was disrupted during the pandemic, however there are signs that interest in development of this type of accommodation is once again picking up. This type of accommodation has certain capacity limits as it is driven by the number of student places at the two local universities, however it is unclear when this could be reached.
- 4.2.3 Historically, registered housing providers in Stoke-on-Trent used to take on many smaller sites for development (10-50 units). Sites were council-owned and typically included old primary schools. More recently, there has not been funding available for this type of development by registered providers.
- 4.2.4 The council also has Fortior Homes, its Council owned and funded housing company, which has delivered a number of sites over the last decade or more. Due to the nature and complexity of the sites involved, viability issues have also affected some of these projects.

## 4.3 Viability

- 4.3.1 As set out in Section 2.3 of this report, Stoke-on Trent has seen a long-term trend of low house prices, and low house price growth when compared to neighbouring local authorities and to national averages.
- 4.3.2 These low values have led to subsequent viability issues, particularly with certain types of development in Stoke-on-Trent, including complex brownfield sites.
- 4.3.3 The Stoke-on-Trent Local Plan Viability Assessment (consultation document dated October 2023). This whole plan viability assessment has been produced by HDH Planning, and is an important evidence base document to inform and underpin the Local Plan preparation.
- 4.3.4 The report provides evidence that will test plan wide and site specific policies to ensure that the emerging policies are realistic and that the cumulative costs of relevant policies will not undermine the delivery of the Plan.
- 4.3.5 Key policy assumptions tested were:
- Biodiversity Net Gain
  - Carbon and Energy
  - Accessibility
  - Water Standard
  - Affordable Housing
- 4.3.6 The above were tested for high, medium and low policy requirements against different development typologies.
- 4.3.7 While the policy implications of the report are yet to be finalised, that the findings showed were that, when considering the 'low' policy requirement, small brownfield and brownfield flattened development is not viable, particularly in relation to affordable housing requirements. This emphasises why flexible policies and careful negotiation of Section 106 agreements is vital to ensure that sustainable brownfield sites continue to come forward for development.

## 4.4 Consultation and engagement

- 4.4.1 In order to ascertain views of developers directly, a short survey was issued to a number of developers who have or are working in the locality. The questions sought to confirm what, in the experience of these local developers, were the key barriers to delivery of housing development on the sites they are involved with.
- 4.4.2 Respondents were all currently involved in delivering housing development in Stoke-on-Trent, predominantly on sites of strategic size, delivering over 500 units. Most of the sites were brownfield and one was partially on Council owned land.
- 4.4.3 The results showed that respondents felt that the main barriers they had experienced were:
1. The planning process
  2. Construction costs
  3. S106 costs and general viability concerns.
- 4.4.4 The planning process was identified by respondents as the most significant barrier to housing delivery. It is recognised that the planning process undertaken by developers of large strategic sites face significant complexity and often delays throughout determination, no matter the location in England and Wales. However, this is not a problem that is unique to Stoke-on-Trent, and it is not considered within the scope of the Action Plan to resolve such issues.
- 4.4.5 The increasing concern over development costs and viability was clear from the way respondents ranked cumulative issues of construction costs and S106 costs.
- 4.4.6 A copy of the survey questions is set out below.

### Survey Question

Are you currently actively involved in developing a site/ sites in Stoke-on-Trent?

How many units will the site(s) deliver?

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**Survey Question**

Is the site(s) greenfield or brownfield?

Is the site owned by the Council or another public body?

Is your expectation that the site be partially or wholly delivered?

What are the main barriers to delivery that you have experienced (scale of 1-10):

- Planning process
  - Construction costs
  - S106 costs
  - Other general viability concerns
-

## 5.0 Actions to improve delivery

- 5.1.0 This section of the plan sets out the actions that are currently being taken which will help to improve housing delivery in future years. It also sets out additional actions which have been identified to overcome the barriers to delivery that are specific to Stoke-on-Trent.

### 5.1 Steps already being taken

#### Identifying sites

- 5.1.1 **The New local plan** – As detailed in this report. Stoke-on-Trent is currently in the process of producing a new Local Plan. This will identify key sites which will be allocated for development, with clear development parameters to guide development. Where sites are on land that is currently greenfield or Green Belt, this will create greater certainty for developers and unlock new sites for strategic housing delivery.
- 5.1.2 The Council uses its **Annual Monitoring Report (AMR)** to monitor both housing delivery and supply, in addition to the **5YHLS report**.
- 5.1.3 The Council has established and maintains a **Brownfield Land Register** containing sites that are appropriate for residential development. The Brownfield Land Register is updated on an annual basis.
- 5.1.4 The Council, in preparation for the new Local Plan has undertaken a number of **‘Call for Sites’ to support a Strategic Housing and Economic Land Availability Assessment (SHELAA)**. This process ensures that the Council has the latest evidence from landowners/developers on existing SHELAA sites and provides an opportunity for new sites to come forward and be assessed. The sites identified have been mapped by the council, alongside the brownfield land register sites and sites with planning permission.

## Supporting the planning process

- 5.1.5 **Validation checklist** – In order to speed up validation and aiming to improve quality of inadequate submissions and the efficiency of validation, a local Validation List is being prepared.
- 5.1.6 **Planning Performance Agreements** – These are already in frequent use to aid the delivery of more complex planning applications. PPAs set realistic and agreed timescales from the start of an application, giving developers more certainty.

## Focus on viability

- 5.1.7 **The Stoke-on-Trent Local Plan Viability Assessment** is soon to be published. This important piece of research will inform the forthcoming Local Plan, and key policies and site allocations will be tested against this to ensure that these policies are deliverable and can be implemented in a sustainable manner. **New local plan policies** will take viability concerns into account, seeking to maximise affordable housing contributions on sites that can best afford them (typically larger greenfield sites) while accepting that smaller brownfield sites may fall short of current targets.
- 5.1.8 **The Council are unlocking delivery on council-owned land.** This includes for example the council taking the lead on a mitigation strategy for the loss of playing fields associated with former school sites, to unlock these for development in the future.
- 5.1.9 There is ongoing work within the Council to establish how **Fortior Homes** can expand its activities to further support housing delivery.
- 5.1.10 The Council and **Homes England** are actively working on an ambitious housing delivery pipeline across 22 sites, 3 of which are currently being implemented and 5 of which are currently in planning. This is hoped to deliver a total pipeline of over 4,800 homes over a number of years. Approximately 18 of the 22 sites have known viability issues and need public funds to progress to delivery.
- 5.1.11 The Council have been successful in obtaining **grant funding** totalling nearly £60 million from a number of sources which is supporting the delivery of housing sites

currently in the pipeline, including the Levelling Up Fund, Housing Infrastructure Fund, Brownfield Land Remediation Fund and the Affordable Homes Programme.

- 5.1.12 There is significant work ongoing to bring empty homes back into use, however it is acknowledged this does not count towards meeting the housing targets.

## 5.2 Additional actions suggested

### Support for small sites

- 5.2.1 The council are currently preparing a **Design Code** for commercial development. Following on from this, there is an ambition to prepare a residential Design Code. As part of this, guidance could include a section which focuses on small, infill brownfield plots. The guidance should seek to give simple and comprehensive guidance that will help to clarify the required standards and process for delivering good design on such sites. There is potential for this to be a Supplementary Policy Document (SPD), sitting on the back of the Local Plan.
- 5.2.2 **Local Plan policies** could include support for small sites. For example, this could include exceptions for affordable housing on complex or smaller brownfield sites; permitting up to 5 dwellings subject to conditions; and supporting self-build and custom build and supporting the use of gardens and urban infill sites.

### Engaging and supporting developers

- 5.2.3 Set up a **Developer Forum** to engage locally active developers. This could include informal engagement to identify developers and prospective sites, and barriers to delivery being faced.
- 5.2.4 **Council-backed development** – The Council will continue to review its portfolio of sites to identify those where support for development can be initiated. This could include tackling pre-commencement issues like contamination, or negotiating access to public funding with bodies such as Homes England.

### Supporting the planning process

- 5.2.5 Stoke-on-Trent offers a range of **pre-application advice services**. One way to encourage people to utilise these eservices is to ensure that the process is streamlined and easily navigable, especially for less experienced applicants. Currently Stoke-on-Trent requires a form to be downloaded and then emailed to the planning department. Alternative systems, such as the one used by Newcastle-under-Lyme Council, have an online portal which takes applicants through the pre-application registration process step by step and offers a simple service for payment. The current system will be reviewed to identify potential for improvement.
- 5.2.6 The Council's planning teams are currently split into Major Applications and Minor Applications. A further improvement to ensure that officers can focus on specific types of applications could be to introduce a Strategic Applications team, which would split the current **Major Applications team**, ensuring that the much larger strategic applications are being dealt with by a focussed team.
- 5.2.7 Stoke-on-Trent currently have a **standard S106 wording template** which helps to reduce uncertainty for developers and streamline this process and will be kept under review.
- 5.2.8 Similarly, having a published set of **standard or template conditions** can streamline the process of negotiating conditions for applicants and give greater certainty. This is something that will be investigated. It could potentially be consulted on via the developer forum.

## Data monitoring

- 5.2.9 It is helpful to ensure that there is active **monitoring of sites that are about to lapse** or where construction has stalled. In such instances, it may be that there are opportunities for the Council to help the developers keep the permissions alive. The Council does currently monitor sites regularly however there is no formal process. There could be potential for this to be a more structured, regular form of monitoring, possibly linked to the AMR.



- 5.2.10 It may also be helpful to conduct a more in-depth review of major sites that have lapsed or stalled in recent years. This will help to establish whether there are any lessons to learned or any actions to be taken away.

### **5.3 Actions to be monitored**

- 5.3.1 The Actions table below sets out the agreed actions against a suggested timescale.

Housing Action Plan

Action	Steps to be taken	Outcome	Priority	Action owner	Timescale
The New Local Plan	Adoption of the New Local Plan	Successfully adopted	High	Planning Policy Team	<p>Regulation 18 consultation: September/October 2025.</p> <p>Regulation 19 and 20 consultation: April/May 2026</p> <p>Regulation 22 submission: November 2026 (followed by examination and adoption)</p>
Annual Monitoring Report and 5YHLS	Annual updates to each report	Production of updated AMR and 5YHLS	High	Planning Policy Team	Annually

## Stoke-on-Trent Housing Delivery

### Housing Action Plan

Action	Steps to be taken	Outcome	Priority	Action owner	Timescale
Brownfield Land Register	Updated and maintained	Up to date register	High	Planning Policy Team	Annually
Strategic Housing and Economic Land Availability Assessment (SHELAA)	SHELAA to be updated	Updated SHELAA to be published	High	Planning Policy Team	September 2025
Local Validation checklist	Local validation list to be drafted	Local validation list to be published	Medium	Planning Policy Team	September 2025
PPAs	Ongoing use of PPAs to support major sites prior to submission	Increased use of PPAs	Medium	Planning Team	Ongoing
Local Plan Viability Assessment	Final drafting of the report	Publish final report	High	Planning Policy Team	September 2025

## Stoke-on-Trent Housing Delivery

### Housing Action Plan

Action	Steps to be taken	Outcome	Priority	Action owner	Timescale
Council owned land	Monitor and identify opportunities to utilise council-owned sites for housing delivery	Unlocking delivery on council-owned land	High	Housing Development Team	Ongoing
Fortior Homes	Explore how Fortior Homes can expand its activities	Increased housing delivery through Fortior	High	Planning Team	Ongoing
Homes England	Continue partnerships with Homes England	Identify future partnership opportunities	High	Housing Development Team	Ongoing
Grant funding	Continue to explore grant funding opportunities	Secure further grant funding support	High	Housing Development Team	Ongoing
Residential Design Code	Agree to produce a residential Design Code	Publish a Residential Design Code	Medium	Planning Policy Team	2027

## Stoke-on-Trent Housing Delivery

### Housing Action Plan

Action	Steps to be taken	Outcome	Priority	Action owner	Timescale
Local Plan policies for small sites	Explore policies that enable delivery on small sites	Adopt Local Plan	High	Planning Policy Team	Refer to Local Plan timetable.
Developer Forum	Investigate existing forums or set up a new developer forum	Establish a forum with local developers and a structured engagement	High	Planning Team	April 2026
Pre-application advice services	Review the pre-app service's online platform	Streamlines service	Medium	Planning Team	April 2026
Major Applications team	Explore the need for a major applications team	Conclude on the effectiveness of this	Medium	Planning Team	April 2026
Standard S106 wording	Review the current S106 template	Issue revised S106 template	Medium	Planning Team	April 2026
Template conditions	Explore the benefits of a conditions template	Conclude on the effectiveness of this	Medium	Planning Team	April 2026

## Stoke-on-Trent Housing Delivery

### Housing Action Plan

Action	Steps to be taken	Outcome	Priority	Action owner	Timescale
Monitoring of lapsed/ stalled sites	Review the current monitoring process	Identify a structured form of monitoring such sites	Medium	Planning Team	September 2026
Lessons learned from strategic lapsed/ stalled sites	Identify key sites that may present lessons learned	Conduct an internal review and disseminate findings	Medium	Planning Team	December 2026

## 6.0 Monitoring

- 6.1.1 Actions will be carried out and details published in accordance with the requirements detailed in the Actions table above.
- 6.1.2 This Housing Action Plan will be reviewed at least on an annual basis where Stoke-on-Trent falls short of 95% of its HDT target each year. The Council will monitor the progress against each action, and review their effectiveness. New or alternative actions may then be suggested.
- 6.1.3 Where a formal Action Plan is not required (ie. where the housing targets above 95% are met), it is nonetheless recommended that a review of the Actions is undertaken. Progress against each of these is likely to ensure that the Council continues to achieve the housing targets in future years and identifies where potential barriers are forming.