City of
Stoke-on-Trent

2026 Local Plan Viability Assessment

Update Note to the 2024 LPVA

March 2026

HDH Planning & Development

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1. Introduction

1.1 Stoke-on-Trent City Council is in the process of preparing a new Local Plan which will replace the current adopted *Newcastle-Under-Lyme and Stoke-on-Trent Joint Core Spatial Strategy, 2009* and the saved policies from the *Stoke-on-Trent City Plan 2001*. The new Local Plan will address revisions to the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG), addressing the future development needs of the City including housing needs, the local economy, environmental considerations, and community infrastructure needs and transport.

1.2 HDH Planning & Development Ltd was appointed to update the Council's viability evidence and produced the Local Plan Viability Assessment (LPVA) (May 2024). The purpose of the LPVA was to inform the development of planning policies, assess the cumulative impact the emerging policies and to consider the deliverability of the planned development and to ensure that the emerging policies are realistic and will not undermine the delivery of the Plan.

1.3 In November 2023, an early draft of the 2024 LPVA formed the basis of a technical consultation with the development industry. Representatives of the main developers, development site landowners, their agents, planning agents and consultants working in the area and housing associations were be invited to comment. Subsequently the completed report was subject to more formal consultation through the Regulation 18 process.

1.4 The data in the 2024 LPVA Viability Update was based in October 2023 / January 2024. Over the two or so years since the 2024 LPVA was undertaken, the costs and the values, being the main inputs into a viability assessment, have changed and several changes / clarifications have been made to national policy. The Council has also refined some of the policies in the emerging Local Plan and clarified which sites (including some new sites) that it proposes to take forward. In December 2025, the Government published a draft iteration of the NPPF. This includes some major changes to the planning system. The changes are considered in Section 5 below.

1.5 This March 2026 note considers how these changes may impact on viability. This note should be read as an annex to the *Stoke-on-Trent City Council Local Plan Viability Assessment* (HDH, May 2024).

2. Changes in House Prices

2.1 The residential value assumptions in the 2024 LPVA were researched and gathered in October 2023 / January 2025. Since then, the housing market has moved on. There are a range of data sources that can be referenced; the Land Registry is the most complete.

Table 2.1 Change in Average House Prices

	Stoke-on-Trent	Staffordshire	West Midlands	England & Wales
2024-01	£134,207	£227,928	£221,597	£272,714
2025-11	£148,757	£245,073	£233,751	£287,528
Change	£14,550	£17,145	£12,154	£14,814
	10.8%	7.5%	5.5%	5.4%

Source: Land Registry (February 2026). Contains HM Land Registry data © Crown copyright. This data is licensed under the Open Government Licence v3.0

2.2 This data shows that average prices in the Council area have increased about 11%, which is more than the increases seen regionally (6%) and nationally (5%). This data can be disaggregated and newbuild sales separated out.

Table 2.2 Change in Average Newbuild House Prices – Stoke on Trent

	Newbuild	Existing
2024-01	£156,923	£133,438
2025-09	£180,130	£150,572
Change	£23,207	£17,134
	14.8%	12.8%

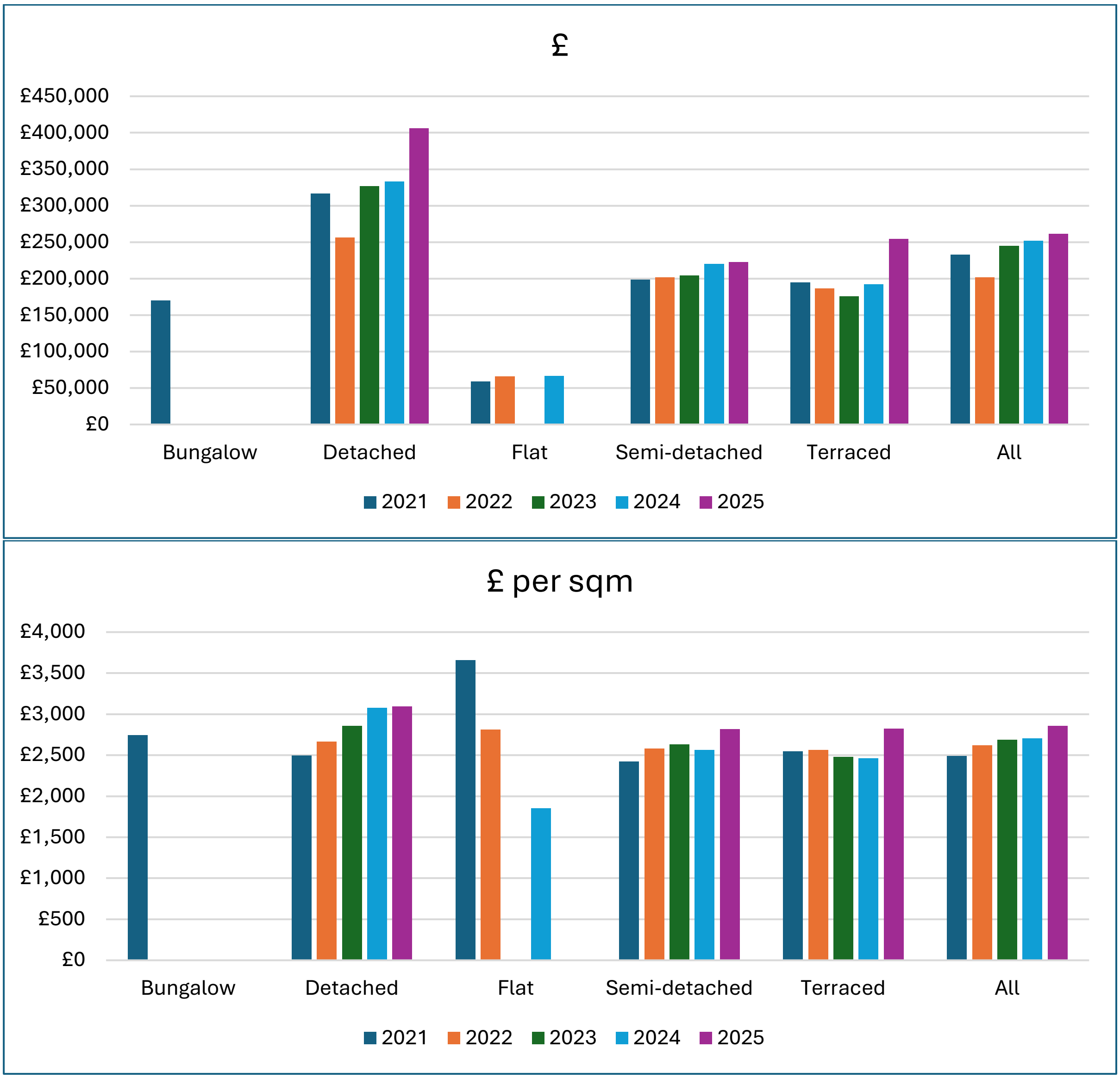
Source: Land Registry (February 2026). Contains HM Land Registry data © Crown copyright. This data is licensed under the Open Government Licence v3.0

2.3 The Land Registry's latest data suggests that the average newbuild sale price has increased by about 15% over the two years in the Council area.

Newbuild House Prices

2.4 The 2024 LPVA included data on newbuild price paid data sourced from Landmark (Table 4.4 and Figure 4.6). In this note, this data has been refreshed using data from Landstack. The Landstack data combines data from the Land Registry and from the EPC Register and other sources, for newbuild and existing property sales, since the start of 2021.

Figure 2.1 Residential Prices Paid – by year - Newbuild Only



Source: Landstack (February 2026)

2.5 The above data compares with the data from Landmark presented in Appendix 7 of the 2024 LPVA. In the 2024 LPVA the data, for the period 2020 to 2023, suggested that the average newbuild house price was £175,843 or £2,615 per sqm. This updated data suggests that average newbuild house prices are £261,295 or £2,859 per sqm. When considered on a floor area basis the increase is 9.3%, which is less than the increase of about 15% suggested by the Land Registry as set out above.

2.6 The Landstack data is disaggregated, as set out in **Appendix 1** of this note. The prices paid for newbuild and existing homes are shown.

2.7 A survey of newbuild asking prices was carried out in February 2023 and then refreshed in October 2023 and again in January 2024 (Tables 4.8, 4.9 and 4.10 in the 2024 LPVA). The average values were as follows:

Table 2.3 Average Newbuild Asking Prices

	February 2023	October 2023	January 2024
Asking Price £	£295,423	£302,722	£254,965
Asking price £ per sqm	£2,849	£2,881	£2,867

Source: Tables 4.8, 4.9 and 4.10 2024 LPVA

2.8 The survey of newbuild asking prices was repeated in February 2026 and summarised in **Appendix 2**. The average asking price has increased to £307,336 / £2,857 per sqm.

2.9 Taking the above into account, the residential price assumptions have been updated as follows.

Table 2.4 Residential Price Assumptions (£ per sqm)

	October 2023	**February 2026**
Greenfield		
Large sites >100 units	£3,300	£3,450
Medium sites 100 units to 15 units	£3,000	£3,200
Small sites <15 units	£3,200	£3,400
Mixed use sites (greenfield / brownfield)	£2,900	£3,150
Brownfield		
Housing	£2,750	£2,800
Flats	£2,500	£2,600

Source: HDH (February 2026)

Affordable Housing Values

2.10 The derivation of the value assumptions for affordable housing was set out from paragraph 4.55 of the 2024 LPVA. These have been updated using the same method. The rental information has been updated using the same sources and the calculation is repeated. The calculations are set out in Appendix 3.

Table 2.5 Updated Affordable Housing Values

	2024	**2026**
Social Rent	£1,285	£1,320
Affordable Rent	£1,605	£1,605

Source: HDH (February 2026)

The Wider Housing Market

2.11 The development identified in the new Local Plan will be built out over many years and across several development cycles. It is useful to consider how values may change in the future.

There is increasing confidence in the housing market as reported by the RICS. The December 2025 RICS UK Residential Market Survey[1] (published in January 2026) said:

> ***Activity levels remain subdued for now, but forward-looking metrics turn noticeably more positive***
>
> - *New buyer enquiries and agreed sales indicators still in slightly negative territory*
> - *Aggregate house prices continue to display marginally negative momentum*
> - *Both near-term and twelve-month sales expectations turn significantly more positive*
>
> *The December 2025 RICS UK Residential Market Survey reveals that market activity remains subdued, with both buyer demand and agreed sales continuing to register negative readings. However, there are encouraging signs of a shift in sentiment, as respondents express greater optimism around the outlook for sales, both over the near-term and for the year ahead. This improved confidence appears to be underpinned by expectations of further monetary policy easing, alongside the removal of Budget-related uncertainty which had weighed on the market in recent months.*
>
> *The new buyer enquiries indicator registered a headline net balance of -24% in December, still clearly negative albeit slightly less so than the -30% posted last time. Moreover, this now represents the sixth successive negative reading, confirming that the market has been operating at a subdued level for a fairly sustained period.*
>
> *Agreed sales show a similar pattern, with the latest aggregate net balance of -19% little changed from the -22% reading previously. As such, this continues to signal a contraction in activity, even if the pace of decline appears to be easing marginally. Perhaps one of the more striking features from the latest monthly data is the improvement in near-term expectations. Indeed, the three-month sales expectations series returned a net balance of +22%, marking the most upbeat reading since October 2024. Alongside this, respondents' views on the twelve-month outlook also brightened, with a net balance of +34% of survey participants now expecting sales to rise (+15% beforehand), the strongest reading since the end of 2024.*
>
> *On the supply side, the new instructions indicator registered a net balance of 0% in December 2025, up from -17% in the previous survey iteration and now consistent with a generally stable picture (having been in decline over the four months beforehand). That said, the net balance for the market appraisals series remains more downbeat at -30%, showing that respondents still feel the current run rate of appraisals is below that of twelve months ago, suggesting a significant uptick in the new instructions pipeline is unlikely just yet.*
>
> *House prices continued to face modest downward pressure in December, with the latest net balance remaining unchanged from November at -14% (although this is slightly less negative than the recent low of -19% seen in October). While this measure suggests house prices are still ever so slightly in decline at the national level, the trend does appear to now be stabilising. Continuing to display a weaker picture than the national average, however, respondents in London (net balance -42%) and the South East (-32%) continue to see a more pronounced decline in prices relative to the headline readings. At the other end of the scale, prices across Scotland and Northern Ireland continue to move higher.*
>
> *The forward-looking picture for house prices has shifted of late, with near-term sentiment now signalling a broadly flat outlook over the next three months as the headline net balance moved to -6% from a weaker reading of -14% seen previously. For the year ahead, a net balance of +35% of contributors are now of the opinion that prices will return to growth, up from readings of +16% and +24% in October and November respectively.*
>
> *In the lettings market, tenant demand slipped further into negative territory, with this month's net balance falling to -27% from -22% last time. While this data is not seasonally adjusted like the rest of the survey figures (and so likely reflects some seasonal patterns), the latest reading is still the weakest since the early stages of the pandemic and picks up a significant loss of momentum in demand. At the same time, the net balance for new landlord instructions remains*

[1] https://www.rics.org/uk/news-insight/research/market-surveys/uk-residential-market-survey/

deeply negative at -39%. Over the near term, a net balance of +19% of respondents foresee rental prices edging higher (up from +6% in the previous results). Meanwhile, over the year ahead, contributors are projecting around 3% growth in rents.

2.12 HM Treasury brings together some of the forecasts in its regular *Forecasts for the UK economy: a comparison of independent forecasts* report.

Table 2.6 Consolidated House Price Forecasts

Table 2 - 2025: Growth in prices and monetary indicators (% change)

Forecasters and dates of forecasts			CPI (Q4 on Q4 year ago, %)	RPI (Q4 on Q4 year ago, %)	Average earnings (Q4 on Q4 year ago, %)	Sterling index (Jan 2005=100)	Official Bank rate (level in Q4, %)	Oil price (Brent, $/bbl)	Nominal GDP	House price inflation (Q4 on Q4 year ago, %)
City forecasters										
Barclays Capital	Jan	*	3.3	4.0	-	-	3.75	68.0	-	-
Berenberg	Jan	*	3.4	-	4.3	86.0	3.75	-	-	4.5
Bloomberg Economics	Dec		3.5	-	-	-	3.75	-	-	-
Capital Economics	Jan	*	3.4	4.1	4.8	84.6	3.75	60.0	5.1	1.6
Deutsche Bank	Jan	*	3.4	4.1	-	-	3.75	-	-	-
HSBC	Jan	*	3.4	4.0	4.6	-	3.75	-	-	-
JP Morgan	Jan	*	3.4	-	-	-	3.75	-	5.3	-
KPMG	Jan	*	3.4	-	-	-	3.75	68.2	-	-
Natwest Markets	Jan	*	3.4	4.0	4.5	-	3.75	69.1	5.1	-
Nomura	Jan	*	3.4	4.1	4.1	-	3.75	-	-	-
Pantheon	Jan	*	3.4	4.1	4.9	-	3.75	-	-	2.8
UBS	Jan	*	3.4	4.0	4.4	-	3.75	-	4.9	-
Non-City forecasters										
British Chambers of Commerce	Dec		3.6	-	4.3	-	3.75	-	-	-
Beacon Economic Forecasting	Jan	*	3.2	3.7	4.7	84.1	3.97	68.2	5.4	1.8
CBI	Dec		3.6	3.9	3.9	-	3.75	69.2	5.2	-
CEBR	Jan	*	3.4	4.0	4.4	84.0	3.92	-	-	2.5
Experian Economics	Jan	*	3.3	3.9	4.1	-	3.92	68.9	-	2.2
Heteronomics	Jan	*	3.4	4.0	4.2	85.4	3.75	68.9	-	2.1
ICAEW	Jan	*	3.6	-	-	-	3.75	-	-	-
Liverpool Macro Research	Jan	*	3.5	4.6	4.9	84.7	4.00	-	-	-
NIESR	Nov		3.6	5.3	5.9	-	4.00	-	-	-0.6
Oxford Economics	Jan	*	3.5	4.1	4.4	84.1	3.75	69.1	5.1	1.6
OECD	Dec		3.8	-	-	-	4.0	-	5.3	-
IMF	Oct		3.4	-	-	-	-	-	-	-
Average of forecasts received in the last 3 months (excludes OBR, IMF and OECD forecasts)										
Independent			3.4	4.1	4.5	84.7	3.80	67.7	5.2	2.0
Received this month (marked *)			3.4	4.1	4.5	84.7	3.79	67.5	5.2	2.4
City			3.4	4.1	4.5	85.3	3.75	66.3	5.1	3.0
Range of forecasts received in the last 3 months (excludes OBR, IMF and OECD forecasts)										
Highest			3.6	5.3	5.9	86.0	4.00	69.2	5.4	4.5
Lowest			3.2	3.7	3.9	84.0	3.75	60.0	4.9	-0.6
Median			3.4	4.0	4.4	84.6	3.75	68.9	5.1	2.1
OBR	Nov		3.6	4.7	3.8	84.7	3.9	68.8	4.9	1.8

Source: Forecasts for the UK economy: a comparison of independent forecasts No 462 (HM Treasury, January 2026).

2.13 Property agents Savills are forecasting the following changes in house prices.

Table 2.7 Savills Property Price Forecasts

	2026	2027	2028	2029	2030	Total
Mainstream UK[2]	2.0%	4.0%	5.0%	5.5%	4.0%	**22.2%**
Prime Regional[3]	1.5%	3.0%	4.0%	4.5%	3.5%	**17.6%**
North West[4]	3.0%	5.5%	6.0%	6.0%	5.0%	**27.6%**
UK Rental Growth[5]	2.0%	2.0%	2.5%	2.5%	2.5%	**12.0%**

Source: Savills

2.14 In this context the Nationwide Building Society reported in January 2026:

House price growth edges higher in January

- *Slight rise in annual house price growth to 1.0%*
- *House prices were up 0.3% month on month*
- *Continued improvement in affordability helped drive first-time buyer activity in 2025*

Headlines	***Jan 26***	***Dec 25***
*Monthly Index**	*544.9*	*543.4*
*Monthly Change**	*0.3%*	*-0.4%*
Annual Change	*1.0%*	*0.6%*
Average Price *(not seasonally adjusted)*	*£270,873*	*£271,068*

** Seasonally adjusted figure (note that monthly % changes are revised when seasonal adjustment factors are re-estimated)*

2.15 Halifax Building Society reported a similar situation in February 2026:

Average UK house price rises at the start of 2026

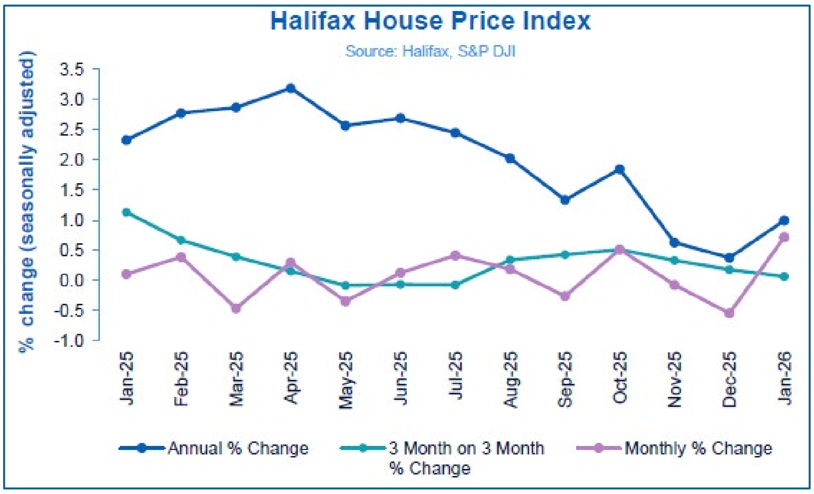
- *House prices increased by +0.7% in January, following a -0.5% fall in December*
- *Average property price is now £300,077, rising above £300k for the first time*
- *Annual growth at +1.0%, up from +0.4% in December*
- *Regional differences in house price performance have become more pronounced*

[2] Savills UK | The mainstream market

[3] Savills UK | Residential Property Market Forecasts

[4] Savills UK | Regional growth in the late stage of the cycle

[5] Savills UK | Rental forecasts



2.16 There is continued uncertainty in the market, however house prices continue to increase.

2.17 The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. Sensitivity testing to changes in values has been carried out.

3. Changes in Development Costs

3.1 The build costs in the 2024 LPVA, as suggested in the PPG, were derived from the BCIS data. The cost figure for 'Estate Housing – Generally' was £1,394 per sqm (January 2024). The equivalent figure now (February 2026) has increased to £1,454 per sqm. This data shows that the cost of construction has increased by 4.4% since the 2024 LPVA was undertaken.

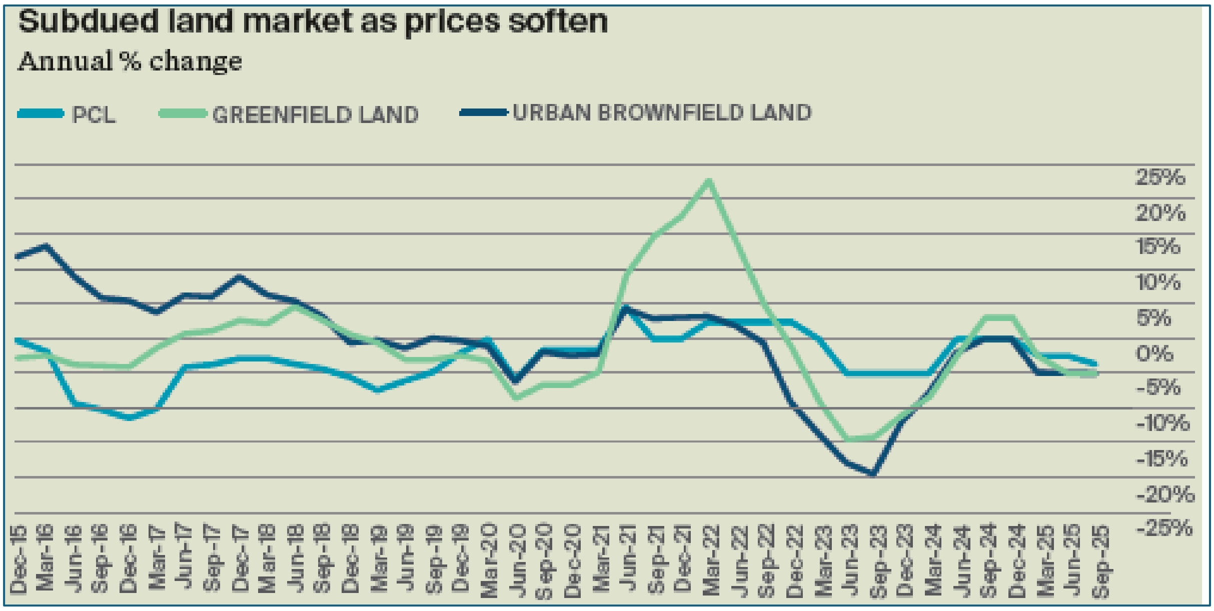
3.2 The BCIS is predicting that, going forward, the General Build Cost Index will increase by about 2.7% over the next year (from February 2026 – 489.1 to February 2027 – 502.5) and by about 8.7% over the next three years. (from February 2026 – 489.1 to February 2029 – 531.8).

3.3 The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. Sensitivity testing to changes in (BCIS based) build costs has been carried out.

4. Changes in Land Value

4.1 It is timely to review how the value of development land has changed over the last few years. There are several sources of relevant information. *Development Land Index* (Knight Frank Q3 2025 – being the most recently published) suggests that land prices may have fallen over the last few years.

Figure 4.1 Knight Frank Development Land Index

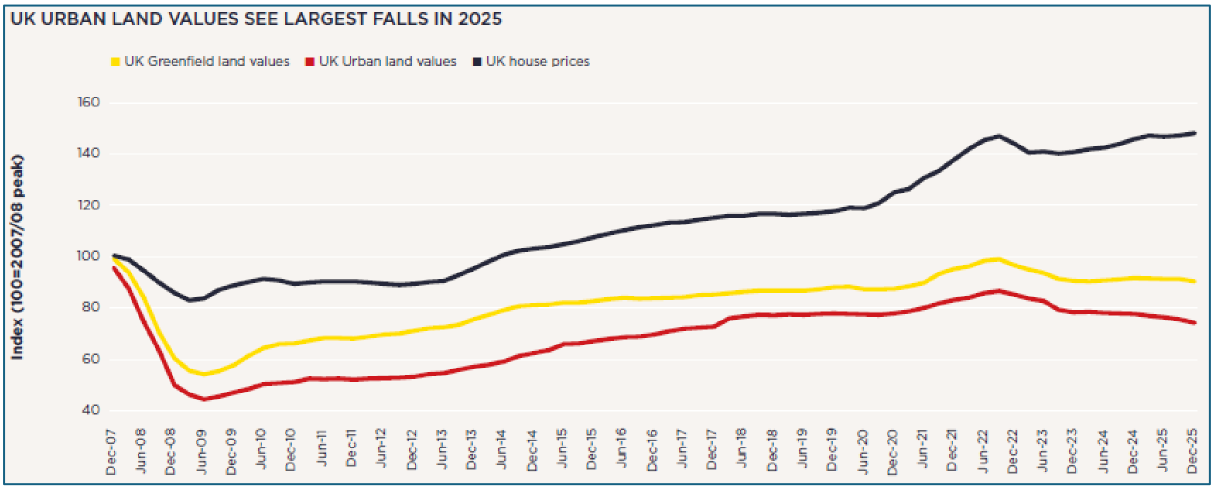


Source: *Development Land Index (*Knight Frank Q3 2025)[6]

4.2 A similar picture is given by Savills in its *Market in Minutes, Residential Development Land* (Savills Q4 2025).

[6] resdev-q3-2025_v2.pdf

Figure 4.2 Savills Indexed Residential Development Land Index (Index to 100 at 2007/2008 peak)



Source: Market in Minutes, Residential Development Land (Savills Q4 2025)[7]

4.3 The above data suggests that the value of development land remains broadly unchanged.

[7] dev-land-mim-q4-2025.pdf

5. Changing Policy Requirements

5.1 In discussion with the Council, the following policy obligations were suggested in the 2024 LPVA. It was stressed that the plan-making process was ongoing, so the policy obligations needed to be kept under review.

a)	Affordable Housing	Brownfield sites 10%, mixed use sites 15%, greenfield sites up to 200 units 20%, and greenfield sites over 200 units (which are likely to be potential strategic sites) 25%. In line with the requirements for 10% AHO and 25% of affordable homes to be First Homes (30% discount). 50% as Affordable Rent.
b)	Design	Part M4(2), 100% of affordable housing M4(3)a, Future Homes Standard (Option 2), Water Efficiency, 10% Biodiversity Net Gain.
c)	Developer Contributions	s106 of £2,500 per unit on typologies and £10,000 per unit on Strategic Sites. These allowances are less than those tested above, however, are considered by the Council, to be realistic estimates, rather than worst case scenarios.

5.2 The affordable housing requirements on the potential strategic sites were suggested as follows:

Table 5.1 Potential Strategic Sites Affordable Housing Assumptions

		Total Affordable	Affordable Rent	Shared Ownership	First Homes
Minton Hollins	Shelton Old Rd	**10.00%**	0.00%	7.50%	2.50%
Birches Head Rd, Redhills Rd	Stoke	**25.00%**	12.50%	6.25%	6.25%
Off Lordship Lane	Fenton	**25.00%**	12.50%	6.25%	6.25%
Cobridge Road	Etruria	**20.00%**	10.00%	5.00%	5.00%
Packmoor West	Packmoor	**25.00%**	12.50%	6.25%	6.25%
Mitchell High School	Bucknall	**10.00%**	0.00%	7.50%	2.50%
Edensor Tech School	Longton	**10.00%**	0.00%	7.50%	2.50%
Berry Hill High School & College	Bucknall	**10.00%**	0.00%	7.50%	2.50%
Land at N.Staffs R.I.	Hartshill	**10.00%**	0.00%	7.50%	2.50%

Source: Table 12.11 2024 LPVA

5.3 This was caveated as follows (paragraph 12.91):

> *Whilst the Council has a good track record of delivering housing on brownfield sites, it would still be necessary to be cautious in relying on brownfield sites in the five year land supply and overall housing trajectory, as the delivery of these is likely to continue to be challenging. It will*

> *be necessary to have regard to the progress of brownfield sites through the development management process and / or commitments from site promoters, and the on-going public-sector interventions. This may influence the selection of sites for allocation.*
>
> *The modelling includes the potential strategic sites. These are included to inform the site selection process. As set out earlier, the delivery of any large site is challenging. It is recommended that that the Council engages with the owners of all the strategic sites in line with the advice set out in the Harman Guidance, and only includes these sites in the new Local Plan if they can be demonstrated to be deliverable.*

5.4 These are a relatively modest set of policy requirements, that were consistent with national policy at that time. Some of these sites have now been consented, or are coming forward in uses other than mainstream housing.

National Policy and Guidance

5.5 The 2024 LPVA update included a review of national policy requirements, including anticipated changes. Changes in national policy are considered further below. A number of Local Plan policies have been refined; these are also considered below.

5.6 In terms of viability the last major update to the Planning Practice Guidance was in 2018. There have been further updates, however these are clarifications rather than more fundamental changes. In terms of methodology, the 2024 LPVA is consistent with the extant (December 2024) NPPF and PPG.

5.7 In December 2025, the Government published a draft NPPF[8] for consultation. The draft NPPF is fundamental re-write of the national planning policy, making a number of significant changes to the planning system, however it stresses the importance of the system being '*genuinely plan-led*'. The draft sets out national decision-making policies. It is proposed that these national decision-making policies are '*read alongside the policies in the development plan*' and are a material consideration when determining planning applications.

5.8 Of particular relevance is paragraph 2 of *Annex A: Implementation*. This says (with added emphasis):

> *Development plan policies which are in any way inconsistent with the national decision-making policies in this Framework <u>should be given very limited weight</u>, except where they have been examined and adopted against this Framework. Other development plan policies should not be given reduced weight simply because they were adopted prior to the publication of this Framework.*

5.9 If this wording is taken, unchanged, into the updated NPPF, (and if taken at face value), it means that policies that are adopted under a Local Plan, that are not consistent with the NPPF would be given little weight. In this regard, the draft Local Plan is not seeking to introduce standards that are inconsistent with national policy, or the draft NPPF.

5.10 Since 2024 there have been updates to national policy. As set out below, several areas of national policy do impact on the Local Plan.

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[8] National Planning Policy Framework: proposed reforms and other changes to the planning system - GOV.UK

5.11 The draft NPPF consultation also seeks views on changes in relation to growth testing, developer's returns and benchmark land values within viability assessments. It will be necessary to keep the changes under review.

Affordable Housing

5.12 Two requirements of earlier national policy have been dropped. Under Footnote 31 of the 2024 NPPF, the requirements for 25% for the affordable housing to be First Home no longer applies. The requirement for 10% of all homes to be Affordable Home Ownership (as per paragraph 66 of the 2023 NPPF[9]) no longer applies. These requirements were assumed to apply in the in the 2024 policy mix, however it has been assumed that these will not be taken forward.

5.13 Under the draft NPPF there is an increased emphasis on Social Rent (building on the changes made in the 2024 NPPF). The plan-making policy *HO1: Assessing the need for homes* says the need for Social Rent (being distinct from Affordable Rent) should be quantified. Draft policies *HO4 Land for large scale residential and mixed-use development*, *HO5: Meeting the needs of different groups* and *HO8: Providing affordable homes* are then rather unclear as to what is then done with this information. At this stage, it is not clear if the tenure mix includes some Social Rent, the amount assessed, or if a lesser amount can be included. HO8 suggests some must be included, but HO4 is more aspirational. This is important as including Social Rent rather than Affordable Rent in the mix has an adverse impact on viability (see from 10.24 of the 2024 LPVA).

5.14 The draft Regulation 19 Local Plan the draft Policy H5 – Affordable Housing seeks:

> *For residential development proposals of 10 dwellings or more, or where the site has an area of 0.5 hectares or more, affordable housing will be required to be provided on the following basis:*
>
> - *20% on large brownfield sites.*
> - *25% on greenfield sites.*
> - *30% on brownfield sites in the Green Belt.*
> - *35% on greenfield sites in the Green Belt.*
>
> *Where affordable housing is provided, it is expected:*
>
> *a that at least 10% of the homes should be available for affordable home ownership, the remaining requirement should be provided for either affordable rent or social rent and will be negotiated on a site-by-site basis to reflect local needs;*

5.15 The Council has recently updated its Housing Needs Assessment which suggests the following tenure mix:

[9] [ARCHIVED CONTENT]

Table 5.2 Updated Housing Mix

Number of bedrooms	Require Social Rent	Require Affordable Rent	Aspire to Own	Total Affordable Housing (Total columns 2 4)	Total Market Housing	Total (Total columns 5 6)
1 bedroom	771	155	157	1,062	781	**1,843**
2 bedrooms	1,877	795	807	3,640	2,828	**6,467**
3 bedrooms	1,541	859	871	3,023	4,348	**7,371**
4+ bedrooms	603	321	325	1,025	144	**1,169**
C2 Dwellings					245	**245**
TOTAL	**4,792**	**2,130**	**1,827**	**8,750**	**8,346**	**17,096**
1 bedroom	16.1%	7.3%	8.6%	12.1%	9.4%	10.8%
2 bedrooms	39.2%	37.3%	44.2%	41.6%	33.9%	37.8%
3 bedrooms	32.2%	40.3%	47.7%	34.5%	52.1%	43.1%
4+ bedrooms	12.6%	15.1%	17.8%	11.7%	1.7%	6.8%
C2 Dwellings					2.9%	1.4%

Source: Figure 4 - *Stoke-on-Trent Residential Mix Assessment Report of Findings* (ORS,July 2025)

5.16 This updated tenure mix is 54% Social Rent, 24% Affordable Rent, 22% Affordable Home Ownership. The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. This is based on this updated mix, (which does not include 10% AHO or 25% of the affordable homes as First Homes).

<u>The Golden Rules</u>

5.17 The 2024 NPPF includes various sections (Paragraphs 67, 68, 155, 156 and 157) concerning releasing land from the Green Belt. Such releases are subject to the Golden Rules which require that the affordable housing contribution on such releases to be 15% above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%.

5.18 Much of the land beyond the Stoke-on-Trent built up area is Green Belt, so the Golden Rules will apply. The relevant paragraphs say:

> *67. As part of the 'Golden Rules' for Green Belt development set out in paragraphs 156-157 of this Framework, a specific affordable housing requirement (or requirements) should be set for major development involving the provision of housing, either on land which is proposed to be released from the Green Belt or which may be permitted on land within the Green Belt. This requirement should:*
>
> *a) be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt; and*
>
> *b) require at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability).*

68. The affordable housing requirement for land within or released from the Green Belt may be set as a single rate or be set at differential rates, subject to the criteria above.

151. Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. Where Green Belt land is released for development through plan preparation or review, the 'Golden Rules' in paragraph 156 below should apply.

156. Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review[58], or on sites in the Green Belt subject to a planning application[59], the following contributions ('Golden Rules') should be made:

a. affordable housing which reflects either:(i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;

b. necessary improvements to local or national infrastructure; and

c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.

157. Before development plan policies for affordable housing are updated in line with paragraphs 67-68 of this Framework, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%[60]. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default. The use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in national planning practice guidance on viability.

5.19 Footnotes 58 and 59 say:

[58] The Golden Rules do not apply to: (i) developments brought forward on land released from the Green Belt through plans that were adopted prior to the publication of this Framework; and (ii) developments that were granted planning permission on Green Belt land prior to the publication of this Framework.

[59] Including where there are variations made to existing permissions (where the existing permission involved development that was subject to the Golden Rules).

5.20 This wording is carried forward into the draft NPPF under draft Policy *GB8: The Golden Rules*., although this includes some further wording:

3. There are only three circumstances in which a site-specific viability assessment may be justified to allow the contributions expected by this policy to be adjusted, which are where a development proposal is:

a. On previously developed land;

b. For a multi-phase, strategic site; or

c. For a development model which is of a wholly different type to that assumed in the viability assessment that informed the development plan.

4. Where the circumstances in paragraph 3 of this policy apply, development should still make the maximum possible contribution to affordable housing and other infrastructure requirements.

5.21 In this regard, the explanatory document published with the draft NPPF *Proposed reforms to the National Planning Policy Framework and other changes to the planning system* (MHCLG, December 2025) asks some further questions. These include:

a) Whether land being released from the Green Belt should be subject to a '*fixed national 'floor', whereby a minimum proportion of Social Rent housing, for example 10% or 15% of the overall development, would be required for these developments, unless otherwise specified in up-to-date development plans*'.

b) Whether or not the BLV in such cases should be restricted to 10 times the EUV.

5.22 The BLV assumptions used in the 2024 LPVA were:

• Brownfield/Urban Sites:	EUV Plus 20%.	
• Greenfield Sites:	Generally	EUV Plus £300,000 per ha.
	Strategic Sites	EUV x 10

5.23 The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. The ability of Green Belt sites to bear a greater level of affordable housing is also tested.

Accessible and Adaptable Standards

5.24 In July 2022, the Government announced the outcome of the 2020 consultation on raising accessibility standards of new homes[10] saying:

> *73. Government proposes that the most appropriate way forward is to mandate the current M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations as a minimum standard for all new homes – option 2 in the consultation. M4(1) will apply by exception only, where M4(2) is impractical and unachievable (as detailed below). Subject to a further consultation on the draft technical details, we will implement this change in due course with a change to building regulations.*

5.25 Under policy *HO5: Meeting the needs of different groups* of the draft NPPF, the Government is proposing the following text:

> *In relation to accessible housing, setting out the proportion of new housing that should be delivered to requirement M4(2) and M4(3) of the Building Regulations. M4(2) requirements should reflect local levels of need, and should ensure that at least 40% of new housing delivered over the course of the plan is delivered to M4(2) or M4(3) standards.*

5.26 The draft Regulation 19 Local Plan and the draft *Policy H5 – Housing Standards* seeks 40% M4(2) Accessible and Adaptable dwellings; and 12% of affordable housing for rent and 7% of market housing as M4(3)a Wheelchair Adaptable dwellings. This would be consistent with the draft NPPF.

[10] Raising accessibility standards for new homes: summary of consultation responses and government response - GOV.UK (www.gov.uk)

5.27 In the 2024 LPVA it was assumed 100% of new homes would be M4(2) Accessible and Adaptable dwellings.

5.28 The additional costs of the further standards (as set out in the draft Approved Document M amendments included at Appendix B4[11]) are set out below. The key features of the 3 level standard (as summarised in the DCLG publication *Housing Standards Review – Final Implementation Impact Assessment* (DCLG, March 2015)[12], reflect accessibility as follows:

- Category 1 – Dwellings which provide reasonable accessibility.
- Category 2 – Dwellings which provide enhanced accessibility and adaptability (Part M4(2)).
- Category 3 – Dwellings which are accessible and adaptable for occupants who use a wheelchair (Part M4(3)).

5.29 The cost of a wheelchair accessible dwelling, based on the Wheelchair Housing Design Guide for a 3 bed house, is taken to be £25,136 per dwelling[13]. The cost of a wheelchair adaptable dwelling, based on the Wheelchair Housing Design Guide for a 3 bed house, is taken to be £10,111 per dwelling[14.] The cost of Category 2 is taken to be £521[15] (this compares with the £1,097 cost for the Lifetime Homes Standard). These costs have been indexed[16] by 53% to £38,460 per dwelling, £15,470 per dwelling and £800 per dwelling respectively. The draft policy requirements therefore add on average, across a whole site, and assuming 25% affordable housing, about £1,434 per unit.

5.30 The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. This is based on this updated requirement.

Environmental Standards

5.31 It is national policy to achieve 'net zero' greenhouse gas emissions by 2050. The Department of Levelling up, Communities and Housing published revisions to Conservation of Fuel and Power, Approved Document L of the Building Regulations as a 'stepping stone' on the pathway to Zero Carbon homes. It sets the target of an interim 31% reduction in CO_2 emissions over 2013 standards for dwellings. The changes apply to new homes that submit plans after June 2022 or have not begun construction before June 2023 – so now apply to all new homes.

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[11] https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m

[12] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418414/150327_-_HSR_IA_Final_Web_Version.pdf

[13] Paragraph 152 Housing Standards Review – Final Implementation Impact Assessment (DCLG, March 2015).

[14] Paragraph 153 Housing Standards Review – Final Implementation Impact Assessment (DCLG, March 2015).

[15] Paragraph 157 Housing Standards Review – Final Implementation Impact Assessment (DCLG, March 2015).

[16] BCIS Index March 2014 316.3, December October 2025 483.3.

5.32 The costs of these higher standards depend on the specific changes made and are considered in Chapter 3 of the 2019 Government Consultation[17]. This suggests that the costs, having been indexed, would add about 3%[18] to the base cost of construction. Having said this, these have been in place for some time, so are now largely reflected within the up-to-date BCIS costs.

5.33 In the spring of 2024, the Government carried out a consultation on how national standards in this regard may be implemented. At the same time the then Housing Minister made a Written Parliamentary Statement[19] which set out the Government's position in this regard as follows:

> *… Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:*
>
> *7.1 That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.*
>
> *7.2 The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).*
>
> *Where plan policies go beyond current or planned building regulations, those policies should be applied flexibly to decisions on planning applications and appeals where the applicant can demonstrate that meeting the higher standards is not technically feasible ….*

5.34 Whilst this direction does not preclude the introduction of policies that go beyond national standards, this does suggest that such policies will need to be well justified and subject to greater scrutiny.

5.35 Under the draft NPPF, the Government is proposing the following text:

> ***Plan-making policies***
>
> ***CC1: Planning for climate change***
>
> *1 Development plans should take a proactive approach to mitigating climate change and supporting the transition to net zero30. They should also take a proactive approach to adapting to climate change, taking into account the implications of extreme weather and long-term climate trends including overheating, wildfires, drought, flood risk, coastal change, water supply, biodiversity and landscapes. They should do this by:*
>
> *a. Proposing development patterns through their spatial strategy and allocations which:*
>
> *i. can help contribute to radical reductions in greenhouse gas emissions (which can be informed by an assessment of baseline carbon emissions and the potential effect of development options on future emissions and their mitigation); and*
>
> *ii. avoid increased vulnerability and improve resilience to the effects of climate change (including through providing for necessary infrastructure improvements*

17 The Future Homes Standard 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings (MHCLG, October 2019).

18 BCIS March 2022 409.0 from BCIS Oct 2018 354.2 = 15.5%. £3,134x15.5%+£3,620. £3,620/85m^2 = £42.60/m^2. £42.60/m^2 / BCIS Estate Housing £1,324 = 3.2%

19 Written statements - Written questions, answers and statements - UK Parliament

and the future relocation of homes and other uses where public safety would be at risk, for example as a consequence of coastal change);

- *b. Addressing any specific risks from climate change in their proposed allocations for development, and necessary adaptations, both of which should be considered for the anticipated lifetime of the development;*
- *c. Setting local water efficiency standards for new development where these are justified in accordance with policy PM13; and*
- *d. Identifying opportunities for green infrastructure provision and nature-based solutions which can safeguard and improve carbon storage, support nature recovery and resilience, and which take account of Local Nature Recovery Strategies in accordance with policy N1.*

National decision-making policies

CC2: Mitigation of climate change

1. *In order to contribute to climate change mitigation and the transition to net zero, development proposals should, where relevant to the proposal:*
    - *a. Be located where a genuine choice of sustainable transport modes exists, and improve opportunities for walking, wheeling, cycling and public transport, in accordance with policies TR3 and TR4;*
    - *b. Support good access to facilities to limit the need to travel, whether through the development's location, through development densities which improve catchment populations for local services, or by incorporating community facilities and premises to support local employment opportunities;*
    - *c. Use design approaches which conserve energy and other resources in accordance with policy DP3(1)(c);*
    - *d. Take advantage of opportunities to re-use existing structures and materials, including by re-using non-contaminated excavated soil and hardcore within the site;*
    - *e. Take advantage of opportunities to draw low carbon energy from decentralised networks (such as district heat networks), where these are available, and to co-locate energy and heat generators and users, especially to take advantage of suppliers of surplus heat and energy;*
    - *f. Contribute to the creation or restoration of habitats which can act as carbon stores, such as through woodland planting and peatland restoration, while avoiding harm to habitats which can act as important carbon stores, including peatland and salt marsh; and*
    - *g. Not increase the extraction of fossil fuels unless it is in accordance with policy M5.*
2. *Substantial weight should be given to the benefits of improving the energy efficiency of existing buildings and/or drawing energy from district heat networks, renewable and low carbon sources (including through the installation of heat pumps and solar panels where these do not already benefit from permitted development rights).*

5.36 The draft NPPF consultation also says (on page 16):

> ***6 Streamlining local standards.*** *We want to promote certainty for applicants and speed up local plan production by limiting quantitative standards in development plans to only those specific issues where local variation is justified. We also want to limit duplication of matters which are covered by the Building Regulations – other than where there is the existing ability to use 'optional technical standards'.*

5.37 Policy *PM13: Setting standards* of the draft NPPF says:

> 1. *Quantitative standards set through development plan policies should be limited to infrastructure provision, affordable housing requirements, parking and design and placemaking, and where this will provide clarity and a high degree of certainty about the requirements that relevant development proposals are expected to meet. Such standards should:*
>
>   a. *Be justified, drawing upon relevant evidence of local characteristics and needs, while utilising or adapting relevant national standards where it is appropriate to do so (such as in relation to green infrastructure). Evidence in support of standards should be proportionate, in accordance with policy PM8, especially where relevant national standards already exist;*
>
>   b. *Not cover matters which are already addressed by Building Regulations, other than in relation to:*
>
>   i. *accessibility standards, for which local standards in relation to requirement M4(2) (accessible and adaptable dwellings) and/or M4(3) (wheelchair user dwellings) of the Building Regulations should be set in line with policy HO5; or*
>
>   ii. *water efficiency, for which it may be appropriate to apply the tighter Building Regulations optional requirement where justified, or exceptionally a more stringent local standard in areas of serious water stress.*
>
>   c. *Not cover matters relating to the construction or internal layout of buildings unless they are to implement the nationally described space standard.*

5.38 Under *PM13: Setting standards* the draft NPPF consultation says:

> *In addition, the policy proposes preventing standards which cover matters already addressed by building regulations, with the exception of the established national technical standards for accessibility and water efficiency. In relation to water efficiency, the policy recognises that some areas may need to set a tighter standard than the existing optional requirement, due to the pressure on water supplies. This reflects relevant parts of the Written Ministerial Statement made on 19 December 2023 titled The Next Stage in Our Long-Term Plan for Housing Update. The Department for Environment, Food and Rural Affairs ongoing consultation on revising water efficiency standards will not affect this policy.*
>
> *Beyond these areas, the policy identifies specific areas where local standards should not be set. This includes matters relating to the construction or internal layout of buildings (other than the nationally described space standard), which the government considers are matters best left to the market to determine.*
>
> *The policy as drafted would limit local standards for energy efficiency, as we are concerned that varying standards across local plans make it difficult for the construction sector to adapt and deploy energy efficiency technologies at scale. If this specific restriction were to be taken forward following consultation, we intend to use secondary legislation to commence section 43 of the Deregulation Act 2015 to amend the Planning & Energy Act 2008 to make clear that local plans should not set higher energy efficiency standards for residential development. The draft Framework policy would also replace the policy contained in the 2023 Written Ministerial Statement titled Planning – Local Energy Efficiency Standards Update.*

5.39 The Government has indicated that it will be implementing the Future Homes Standard through Building Regulations, but the timing remains uncertain. Whilst no formal announcement has been made, it is prudent to assume that the FHS will be mandated in the short to medium term.

5.40 Draft Policy D1 Residential Design, of the draft Regulation 19 Local Plan is consistent with this approach seeking development to the Future Homes Standard.

5.41 Paragraph 6.10 of The Future Homes Standard 2023 consultation on the energy efficiency requirements of the *Building Regulations affecting new and existing dwellings. Consultation-Stage Impact Assessment* sets out the following costs:

> *6.6 A summary of the impacts considered under this Impact assessment (IA) is provided below in Table 3, relative to the counterfactual – the counterfactual is the 2021 notional building specification, which has a gas boiler, lower efficiency solar panels and wastewater heat recovery, or a heat pump (see Routes to Compliance (para 5.23 - 5.25) section). This is with the exception of mid-high rise, which is an ASHP and gas boiler hybrid communal heat network. Broadly, Option 1 is a home with a heat pump and more efficient solar panels. Option 2 meets our public commitments through the use of heat pumps only. All figures are Net Present Values (NPV) over 10 years of policy and a subsequent 60-year life of the buildings. Negative NPVs are given in parenthesis and represent costs. The figures represent the aggregate impact across the building mix…*
>
> *6.10. … In 2022 prices, on a per-home basis (3-bed semi-detached), Option 1 leads to a ~£6,200 (4%) increase in upfront capital costs, whereas Option 2 only leads to a ~£1,000 (1%) increase….*
>
> *Additional Capital Costs*
>
> *6.16. The increase in capital costs from the proposed 2025 standards, compared with the continuation of existing 2021 standards (gas boiler and solar pv home), are shown in Table 5. Further breakdown of the costs of the different elements is provided in Appendix C.*
>
> *Table 5: Additional Capital Costs* relative to 2021 Gas Boiler and Solar PV Counterfactual (£)*

	Option 1	Option 2
Detached house	£6,390	£-200**
Semi-detached house	£6,170	£950
Mid-Terraced house	£5,960	£740
Low Rise Flats (<11m)	£4,460	£2,760
Mid Rise Flats (>11m) (same for both option)	£190	£190
Weighted Average (based on assumed build mix)	£4,360	£640
*Gross Undiscounted Costs in 2022 prices, excluding gas asset value cost in counterfactual. If included this would lead to the costs presented in table 5 falling. ** a minus equals a cost saving.		

> *6.17. Over the longer-term, Currie & Brown estimate that the costs associated with both heat pumps and solar PV will fall, as supply chains mature and become more integrated, and learning rates take effect. By the end of the policy appraisal period (10 years), it is assumed that the cost of a heat pump will be around 70% of the initial cost, whilst for Solar PV they will be around 60% of the initial cost.*

5.42 Separately, the *Future Homes Hub, Ready for Zero, Evidence to inform the 2025 Future Homes Standard – Task Group Report* (February 2023)[20] was published before the Government consultation, so is testing a wider sets of options (CS1 to CS5) than are being considered at a national level. The following costs were estimated:

[20] Ready+for+Zero+-+Evidence+to+inform+the+2025+Future+Homes+Standard+-Task+Group+Report+FINAL-+280223-+MID+RES.pdf

Table 5.3 Additional Costs for Options Towards Zero Carbon

		Arcadis Cost uplift compared with Ref 2021	Arcadis Cost uplift compared with Ref 2025	Energy bills variance from Ref 2021 (£700/yr)*
CS1	to be consistent with the expectation that the FHS home should reduce carbon emissions by a minimum of 75% from 2013	2%	-3%	Circa 190/yr more
CS2	to align closely with the current Part L 2021 but electrify the heating	7%	2%	Circa £260/yr less
CS2a	As for CS2 but with batteries on PV and infra-red heating	10%	5%	Circa £50/yr less (Significant under-estimate)**
CS3	to be mainstream recognised low energy techniques and technologies for a very low energy specification, whilst allowing design flexibility	15%	9%	Circa £360/yr less
CS4	to minimise space and water heating, drawing on UK and European low energy building best practice	19%	13%	Circa £450/yr less
CS5	to improve the fabric efficiency to the level that a comfortable temperature is maintained without a heating system	17%	11%	Circa £410/yr less

Source: *Future Homes Hub, Ready for Zero, Evidence to inform the 2025 Future Homes Standard – Task Group Report* (February 2023)

5.43 These costs are somewhat greater than those in the more recent Government consultation, however they predate the Government announcement and are not directly comparable.

5.44 It is important to note that the above costs are the costs over the 2021 Part L, and not the costs over the current BCIS costs. As set out above, it would now be appropriate to assume the additional costs of the increase in standards set out in 2021 Part L add 1% to the current BCIS costs.

5.45 For the purpose of this note, the current changing policy situation is summarised as follows. The additional costs, over and above the current BCIS costs, are summarised as follows:

a) The 2021 changes to Part L of Building Regulations (31% CO_2 saving) to add 1% to the BCIS base costs.

b) The Future Home Standard Option 1 is expected to add 5% (i.e. 1%+4%) to the current BCIS base costs.

5.46 It is timely to note that building to higher standards that result in lower running costs does result in higher values [21] [22], although no premium is assumed in this study (for either residential or non-residential development).

5.47 In November 2021, it was announced that, from 2022, all new homes would be required to include an electric vehicle charging point. This cost is within the cost of the FHS above.

5.48 The modelling in the 2024 LPVA assumed development would be to the FHS. This assumption is carried forward. The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. This is based on this requirement.

Biodiversity Net Gain

5.49 The Environment Act received Royal Assent in November 2021 and mandates that new developments must deliver an overall increase in biodiversity. The PPG was updated in 2024[23] in this regard. The requirement is that developers ensure habitats for wildlife are enhanced relative to pre-development state. Developers must assess the type of habitat and its condition before submitting plans and then demonstrate how they are improving biodiversity.

5.50 Green improvements on-site are preferred (and expected), but in the circumstances where they are not possible, developers will need to pay a levy for habitat creation or improvement elsewhere. The mandatory BNG requirement was introduced for most major developments from 12th February 2024, and for small sites/minor development from 2nd April 2024.

> *The definition of a minor development for the purposes of BNG is development that is not major development and includes:*
>
> - *residential development where the number of dwellings is between 1 and 9 on a site of an area 1 hectare or less, or if the number of dwellings is unknown, the site area is less than 0.5 hectares.*
> - *commercial development where floor space created is less than 1,000 square metres or total site area is less than 1 hectare.*
> - *development that is not the winning and working of minerals or the use of land for mineral-working deposits.*
> - *development that is not waste development.*

5.51 In May 2025, the Government undertook a consultation[24] on the implementation of BNG. This would introduce a *'new medium development threshold for sites between 10 and 49 homes, up to 1.0 ha in size'*. Alternatively, consideration is being given to exempting all minor

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[21] See *EPCs & Mortgages, Demonstrating the link between fuel affordability and mortgage lending* as prepared for Constructing Excellence in Wales and Grwp Carbon Isel / Digarbon Cymru (funded by the Welsh Government) and completed by BRE and *An investigation of the effect of EPC ratings on house prices* for Department of Energy & Climate Change (June 2013.)

[22] Savills UK | The cost and premium for new eco-homes

[23] Biodiversity net gain - GOV.UK (www.gov.uk)

[24] Improving the implementation of biodiversity net gain for minor, medium and brownfield development - GOV.UK

developments. Bearing in mind that this was a consultation, the outcome of which is not yet known, it is assumed the BNG requirements remain as per the current extant NPPF and PPG.

5.52 Policy *N1: Identifying environmental opportunities and safeguards* of the draft NPPF says:

> *Development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations, and is fully justified and deliverable. Any such requirements should not extend to categories of development which are exempt from statutory biodiversity net gain.*

5.53 The Government's impact assessment[25] suggests an average cost of scenarios including where all the provision is on-site and where all is off-site.

Table 5.4 Cost of Biodiversity Net Gain – West Midland (2017 based costs)

	Scenario A 100% on-site	Scenario C 100% off-site
Cost per ha of residential development	£3,461/ha	£63,725/ha
Cost per ha of non-residential development	£3,150/ha	£47,885/ha
Cost per greenfield housing unit	£172/unit	£3,496/unit
Cost per brownfield housing unit	£69/unit	£864/unit
Residential greenfield delivery costs as proportion of build costs	0.2%	3.1%
Residential brownfield delivery costs as proportion of build costs	<0.1%	0.8%
% of industrial land values	0.5%	8.1%
% of commercial land values (office edge of city centre)	0.3%	4.9%
% of commercial land values (office out-of-town - business park)	0.5%	7.6%

Source: Tables 14 to 23: Biodiversity net gain and local nature recovery strategies – Impact Assessment

5.54 Generally, it is expected provision will be on-site on greenfield sites and off-site on brownfield sites. The percentage uplift costs from the above table are used as the costs per ha/unit are a little historic.

5.55 The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. This is based on 10% BNG.

Fire Safety Standards

5.56 A number of further national consultations were announced during December 2022. These included proposed Changes to Approved Document B, sprinklers in care homes, and

[25] Table 14 and 15 Biodiversity net gain and local nature recovery strategies: impact Assessment. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839610/net-gain-ia.pdf

staircases in residential buildings. The Government has since updated Building Regulations[26]. The guidance makes second staircases mandatory in all new residential buildings over 18m (about 6 storeys) in England from September 2026.

Levelling-up and Regeneration Act

5.57 The *Levelling-up and Regeneration* Act become law in 2023. Many of the measures in the Act will be implemented, in due course, through secondary legislation and / or regulations. The provisions within the Act will have a significant impact on the overall plan-making process, but they do not alter the place of viability in the current Local Plan process.

Building Safety Levy

5.58 The Building Safety Levy (BSL) was announced in February 2021 to pay for the remediation of building safety defects as part of the response to the Grenfell Tower fire. The Government published its preferred approach and Guidance in July 2025[27]. In Stoke-on-Trent the rate is £8.28 per sqm for previously developed sites, and £16.56 per sqm for non-previously developed sites.

5.59 The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. This incorporates the BSL.

Planning Practice Guidance

5.60 The December 2025 consultation on the draft NPPF asks a number of questions in relation to viability, including views on changes in relation to growth testing, developer's returns and benchmark land values. It will be necessary to keep these under review.

5.61 The overall requirement for viability testing was updated in December 2025:

> ***How should plan makers set policy requirements for contributions from development?***
>
> *Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). This should include the minimum proportion of Social Rent homes required.*
>
> *These policy requirements should be informed by evidence of infrastructure and affordable housing need, including the need for those who require Social Rent, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. To provide this certainty, Social Rent and other types of affordable housing requirements should be expressed as a single figure rather than a range. Different requirements may be set for different types or location of site or types of development.*
>
> *PPG 10-001-20251216*

[26] Amendments to the Approved Documents - Approved Document B: Fire safety volumes 1 and 2 (publishing.service.gov.uk)

[27] Building Safety Levy: Guidance - Guidance - GOV.UK

> *The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. … Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.*
>
> *PPG 10-002-20251216*

5.62 The policies in the emerging Plan were tested individually and cumulatively in the 2024 viability assessment.

Community Infrastructure Levy Regulations (CIL) and Guidance

5.63 The Council has not adopted CIL. The CIL Regulations came into effect in April 2010 and have been subject to subsequent amendment. From April 2015, councils were restricted in pooling S106 contributions from more than five developments[28] (where the obligation in the s106 agreement / undertaking is a reason for granting consent). The CIL Regulations were amended from September 2019 lifting these restrictions, however payments requested under the s106 regime must still be (as set out in CIL Regulation 122):

a) necessary to make the development acceptable in planning terms;

b) directly related to the development; and

c) fairly and reasonably related in scale and kind to the development.

5.64 In October 2023, the *Levelling-up and Regeneration Act* became law. The Act includes reference to a new national Infrastructure Levy to replace CIL and reform the current developer contribution system. The Government announced, as part of the July 2024 consultation on the draft NPPF, that it will not be taken forward.

Cumulative Impact of Changes in National Policy

5.65 The various changes in national policy (including those that are likely to be mandated in the medium term, are set out and summarised below:

Affordable Housing	Increased emphasis on Social Rent. Unlikely to apply prior to new Local Plan.
Accessible and Adaptable Standards	Across a scheme of 40% M4(2) Accessible and Adaptable dwellings and 12% of affordable housing for rent and 7% of market housing as M4(3)a Wheelchair Adaptable dwellings would increase development costs. The draft policy requirements therefore add, on average, across a whole site and assuming 25% affordable housing, about £1,434 per unit.

[28] CIL Regulations 123(3)

Environmental Standards	The mandating of the Future Homes Standard is expected to add 5% to the current BCIS base costs.
Biodiversity Net Gain	The mandating of 10% BNG is likely to add about 0.2% to the cost of developing greenfield sites and about 0.6% to the cost of developing brownfield sites.
Building Safety Levy	In Stoke-on-Trent the rate for previously developed sites is £8.28 per sqm and £16.56 per sqm for non-previously developed sites.

5.66 Taken together these additional national requirements may increase the cost of development by about 7%.

5.67 The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information.

Updated Policies in the Draft Regulation 19 Local Plan

5.68 The policy testing in the 2024 WPVA was carried out based on the emerging policy topics, and the analysis has then informed the development of policy. The Council has considered some policy areas in more detail. Some of these are covered above as they also relate to changes in national policy. The current (February 2026) working draft Regulation 19 Local Plan has been reviewed and changes (beyond those set out under national policies above considered. Whilst several policies have been updated, on the whole, the updated requirements do not go beyond the current or emerging national standards. There are several policies that have been updated that have the potential to impact on viability.

5.69 The affordable housing requirements, housing mix and requirements for accessible standards have been updated, informed by the updated Housing Needs Assessment as set out under the national policy heading above.

5.70 Policy H6 – Older Persons Accommodation includes a requirement that:

> *Residential development schemes within the Broad Locations for development are expected to deliver 20% of the dwellings for the provision of older persons accommodation. The type of provision is to be determined drawing on the most up-to-date demand evidence for the location.*

5.71 The ability of specialist older person's housing to bear affordable housing was considered in the 2024 LPVA and was shown in Table 10.12, whilst sheltered housing was unlikely to be able to bear affordable housing, it is likely to be viable, without affordable housing, on greenfield sites. All the main Broad Locations are greenfield sites. It is therefore unlikely that this requirement will impact on delivery (assuming affordable housing is not sought from the specialist older peoples housing).

5.72 Policy T2 – Active Travel has been expanded to include:

> *incorporating Sport England's Active Design principles to promote walking, cycling and active travel as the first choice for local journeys. This includes creating safe, direct and attractive routes that are fully integrated into wider walking and cycling networks, with appropriate lighting, natural surveillance and secure cycle storage to support everyday use.*

5.73 This concerns good design and does not go beyond the requirements set out in Policy D1 – Residential Design. The requirements of these policies are covered in the allowances for site costs as set out in the 2024 LPVA.

5.74 Policy D1 – Residential Design also seeks Nationally Described Space Standards. The modelling in the 2024 LPVA assumed development would be to NDSS (see from paragraph 8.31).

5.75 Under Policy NA 2 – Open Space, Sport and Recreation, reference is made to *The Fields in Trust Standards (2024)*[29]. The Council has now confirmed that the requirements, as per the Green Space Strategy - Final report (November 2018), will be sought:

- For residential; 0.012 hectares per dwelling of greenspace shall be provided for the total number of dwellings, irrespective of type or tenure; notwithstanding.
- That such greenspace will be provided in areas of not less than 0.1 hectares regardless of development size.

5.76 This is applied to major development sites. It is important to note that these requirements are only applicable where there is a local shortfall in provision. These requirements are reflected in the modelling. It is anticipated that greenfield sites will provide open space on-site, but brownfield sites may make a financial contribution towards off-site provision.

5.77 The Council has advised that these requirements can be met within the wider site capacity assumptions used elsewhere in the plan-making process.

5.78 The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. These have been updated to incorporate the above requirements.

Infrastructure Provision

5.79 In essence, the requirement is likely to be that development should make appropriate contributions towards strategic infrastructure and mitigation. The Council does not currently set out a formal approach with per unit or similar calculators and has not adopted CIL.

5.80 The approach taken in the in the 2024 LPVA has been carried forward. To inform a decision as to what an appropriate assumption for s106 contributions may be, recent planning approvals have been reviewed. Contributions range from zero to about £18,750 per unit. The average is £4,742 per unit and the median is £1,672 per unit. A base assumption of £2,500 per unit is assumed, however sensitivity testing up to £50,000 per unit is undertaken.

5.81 In this context it is important to note that the Council has a long track record in securing external funding (for example through HIF), to enable development and to provide infrastructure.

[29] Fields in Trust Standards: Creating great spaces for all

6. Regulation 18 Responses

6.1 The Council has reviewed the representations made through the Regulation 18 consultation and provided summaries of those that relate to viability. These are reviewed below. Some of the consultees also made wider points in relation to the draft Local Plan (for example policy wordings) and the plan-making process. Only those comments that relate to the 2024 WPVA are addressed here.

6.2 Relevant responses were received from 2 respondents.

Tetlow King for West Midlands Housing Association Planning Consortium (WMHAPC)

6.3 Several references were made to viability, however there were no technical points concerning the modelling or assumptions made, that need to be addressed.

Network Rail

6.4 The Network Rail noted the importance factoring in appropriate levels of developer contributions when considering viability. This update note is based on the most recent available information and sensitivity resting is carried out.

Home Builders Federation

6.5 The HBF raised a number of points, although some of these relate to the importance of viability testing and are justification for policy requirements (eg NDSS) rather than technical points concerning the modelling or assumptions made, that need to be addressed in this note.

6.6 Concern was raised about the potential impact of seeking BNG on site capacity. Whilst this is noted, it is understood that the Council has taken this into account in the overall site capacity assumptions.

Northstone

6.7 The comments made largely relate to clarifying policy wordings and requirements, and the need for some flexibility, rather than technical points concerning the modelling or assumptions made, that need to be addressed in this note.

West Midlands Housing Association Planning Consortium (WMHAPC)

6.8 Several references were made about viability, however there were no technical points concerning the modelling or assumptions made, that need to be addressed.

7. Strategic Sites

7.1 At the time of the 2024 WPVA, the Council had identified several potential strategic sites to be included in the new Local Plan. These were set out at Table 3.1 of the 2024 report. The Council has now refined this list and considered further sites in the Green Belt.

7.2 The Strategic Sites have now been confirmed, and this note includes high-level testing of these sites, based on information provided by the Council. The sites in the Green Belt are, at this stage, broad locations. These sites are indicative of where the allocations will be made, however the boundaries (and therefore site areas) and details are yet to be finalised.

Table 7.1 Strategic Sites for Viability Testing

BL1 Lightwood	Units	3,000	Potential Green Belt site, modelled on HMA mix. Whole site area 115.89 ha - modelled based on 40 dwellings per ha and includes 36ha POS.
	Gross	115.890	
	Net	75.000	
32	Density	40.0	
BL9 Chatterley Whitfield	Units	1,750	Potential Green Belt site, modelled on HMA mix. Whole site area 113.80 ha - modelled based on 40 dwellings per ha and POS requirement of 21ha and 68% net developable area.
	Gross	64.750	
	Net	43.750	
33	Density	40.0	
H58 Packmoor	Units	800	Potential Green Belt site, modelled on HMA mix. Whole site area 82.03 ha - modelled based on 40 dwellings per ha and POS requirement of 9.6ha and 68% net developable area.
	Gross	29.600	
	Net	20.000	
34	Density	40.0	
BL5 Eaves lane	Units	750	Potential Green Belt site, modelled on HMA mix. Whole site area 36.60 ha - modelled based on 40 dwellings per ha and to include POS requirement of 9ha and 68% net developable area.
	Gross	27.750	
	Net	18.750	
35	Density	40.0	
H39 Redhills Road	Units	747	Largely brownfield site, modelled on HMA mix. Whole site area 47.060 ha - modelled based on 30 dwellings per ha and to include POS requirement of 8.964ha and 74% net developable area.
	Gross	33.864	
	Net	24.900	
36	Density	30.0	
BL2 Trentham	Units	500	Potential Green Belt site, modelled on HMA mix. Whole site area 59.93 ha - modelled based on 40 dwellings per ha and to include POS requirement of 6ha and 68% net developable area.
	Gross	18.500	
	Net	12.500	
37	Density	40.0	
H24 Trentham Fields. Wilson Road	Units	471	Potential greenfield site, modelled on HMA mix. Whole site area 68.30 ha - modelled based on 40 dwellings per ha and to include POS requirement of 5.652ha and 68% net developable area.
	Gross	17.427	
	Net	11.775	
38	Density	40.0	
BL6 Woodhead Lane	Units	425	Potential greenfield site, modelled on HMA mix. Whole site area 15.63 ha - modelled based on 40 dwellings per ha and with 5.1ha POS.
	Gross	15.630	
	Net	10.625	
39	Density	40.0	
BL8 Hollywall Lane	Units	400	Potential greenfield site, modelled on HMA mix. Whole site area 29.42 ha - modelled based on 40 dwellings per ha and to include POS requirement of 4.8ha and 68% net developable area.
	Gross	14.800	
	Net	10.000	
40	Density	40.0	

Source: SoTCC (February 2026)

7.3 These sites are modelled with build out rates that are consistent with the assumptions set out in Table 7.7 of the 2024 WPVA.

8. Findings and Conclusions

8.1 HDH Planning & Development Ltd produced the 2024 WPVA. The study was commissioned to support the development of the Local Plan. The report was undertaken in line with the requirements set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG).

8.2 Since the 2024 WPVA was completed, the costs and the values, being the main inputs into a viability assessment, have changed, and several changes have been made to national policy. The Council has also refined some of the policies in the draft Local Plan. This note considers how these changes may impact on viability and whether it is necessary for the Council to fully update the viability evidence before proceeding.

8.3 The value of newbuild housing and the costs of construction have both increased since the 2024 WPVA was undertaken. The Land Registry data suggests that values have increased by about 11% and analysis of newbuild sales suggest an increase of 15%.

8.4 The analysis of the prices paid for newbuild homes from Landstack suggests that average newbuild house prices (when considered on a floor area basis), are now 9% higher. Newbuild asking prices have not increased. These data sources are not consistent. In this note a cautious approach is taken and newbuild price assumptions are assumed to have increased, informed by the more recent data.

8.5 The BCIS suggests that build costs have increased by 4.4%. Values have increased more than costs, suggesting that viability has improved a little since 2024.

8.6 House price forecasts and build costs forecasts suggest that house prices are likely to continue to increase at a broadly similar rate to that of build costs, providing comfort that the Plan is viable. All other things being equal, the 2024 WPVA remains up-to-date and is the appropriate document to support the next stage of the plan-making process.

8.7 There have been a number of changes to national policy and to the draft Local Plan since the 2024 WPVA was completed.

Updated Policy-on Appraisals

8.8 Sections 10.40 to 10.42 of the 2024 WPVA considered the impact of changes in costs and values on the preferred set of policies, based on further appraisals that were summarised in Appendix 17 of the report. This analysis has been repeated based on the following changes.

a. The Strategic Sites have been modelled individually, based on information provided by the Council.

b. The values are increased, informed by the more recent data and the construction costs rebased to the latest BCIS costs.

c. The housing mix has been updated as per the updated HEDNA. The base affordable housing requirement is taken as per the draft policy (H5) and based 50% Social Rent, 25% Affordable Rent and 25% Affordable Home Ownership.

d. The Wheelchair Accessible M4(3)b has been assumed as per the draft policy as 12% of affordable housing and 7% of market housing and. The balance of the housing is assumed to be Accessible and Adaptable (M4(2)).

e. The open space requirement has been aligned with the Council's Green Space *Strategy - Final report* (November 2018), being for 0.012 hectares per dwelling in major development. On-site provision is assumed on the greenfield sites.

f. It is assumed new housing is to the Future Homes Standard and the national requirements for BNG apply.

g. The Building Safety Levy is included as at £8.28 per sqm for brownfield land and £16.56 per sqm for greenfield land.

h. The open space requirements have been updated to align with those now being sought.

8.9 The appraisal results are summarised in **Appendix 4** below. These results are directly comparable with those included in Appendix 17 of the 2024 WPVA. They are sensitivity tested in relation to changes in development costs and residential values. They are also sensitivity tested in relation to affordable housing in **Appendix 5**.

8.10 The recommendation in the 2024 WPVA (paragraph 10.35) was for the following provision of affordable housing – based on the requirements for strategic infrastructure and mitigation of £2,500 per unit for the typologies and £10,000 per unit for the Strategic Sites.

> *Brownfield sites 10%, mixed use sites 15%, greenfield sites up to 200 units 20%, and greenfield sites over 200 units (which are likely to be potential strategic sites) 25%.*

8.11 This analysis confirms that the updated policy requirements in the draft Plan are appropriate, it is however necessary to note that these results are sensitive to increases in build costs or falls in values.

8.12 As noted in the 2024 WPVA, whilst the Council has a good track record of delivering housing on brownfield sites, it will still be necessary to be cautious in relying on brownfield sites in the five year land supply and overall housing trajectory, as the delivery of these is likely to continue to be challenging. It will be necessary to have regard to the progress of brownfield sites through the development management process and / or commitments from site promoters, and the ongoing public sector interventions.

8.13 As set out above, consideration is given to the Golden Rules for sites in the Green Belt. Releases of land from the Green Belt are required (subject to viability testing) to make an affordable housing contribution that is 15% above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. In the above analysis 35% affordable housing is presumed on the Green Belt Strategic Sites. Whilst the analysis suggests that this should be achievable, the sensitivity testing suggests at a cautions approach is taken and at requirements that is more than this should not be sought.

8.14 At this stage the Council's Infrastructure Deliver Plan (IPD) is still being prepared, and the actual site specific strategic infrastructure and mitigation costs are not yet known. Bearing in mind the above findings, and the fact that there remains uncertainty as to the costs of strategic infrastructure and mitigation, further sets of appraisals have been run. Sensitivity testing of the s106 cost assumption (up to £50,000 per unit) against varied levels of affordable housing, is carried out. The results are summarised in the table below, which shows the maximum level of developer contributions per unit at affordable housing from 0% to 50%.

8.15 These tables are comparable to Table 10.9 of the 2024 LPVA, although they are based on the updated policy-on scenario as tested above. As in the 2024 WPVA, the typologies that are able to bear at least £2,500 per unit in developer contributions are shaded green, as are the Strategic Sites that are able to bear at least £10,000 per unit.

8.16 The brownfield sites perform less well and are now shown and not being able to bear developer contributions, even without affordable housing, i.e. unviable. Whilst these sites have been subject to the wider increases in costs, values have not increased in a similar way.

8.17 These results may be helpful when the IDP is complete, to check the capacity of the Strategic Sites to bear higher levels of developer contributions.

Table 8.1 Affordable Housing v Developer Contributions

Affordable Housing	**0%**	**5%**	**10%**	**15%**	**20%**	**25%**	**30%**	**35%**	**40%**	**45%**	**50%**
Large Greenfield	£50,000	£50,000	£45,000	£40,000	£35,000	£30,000	£25,000	£20,000	£15,000	£10,000	£5,000
Greenfield	£20,000	£15,000	£10,000	£0	£0	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable
Small Greenfield	£30,000										
Higher Density Greenfield	£30,000	£25,000	£20,000	£15,000	£15,000	£10,000	£5,000	£0	Unviable	Unviable	Unviable
Large Mixed Use	£40,000	£35,000	£30,000	£25,000	£20,000	£20,000	£15,000	£10,000	£5,000	£0	Unviable
Mixed Use	£20,000	£15,000	£10,000	£10,000	£5,000	£0	Unviable	Unviable	Unviable	Unviable	Unviable
Small Mixed Use	£25,000										
Large Brownfield	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable
Brownfield	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable
Brownfield Flats	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable
Affordable Housing	**0%**	**5%**	**10%**	**15%**	**20%**	**25%**	**30%**	**35%**	**40%**	**45%**	**50%**
BL1 Lightwood	£45,000	£40,000	£35,000	£30,000	£25,000	£20,000	£15,000	£10,000	£5,000	£0	Unviable
BL9 Chatterley Whitfield	£50,000	£50,000	£40,000	£35,000	£30,000	£25,000	£20,000	£15,000	£10,000	£5,000	£0
H58 Packmoor	£50,000	£50,000	£45,000	£40,000	£35,000	£30,000	£25,000	£20,000	£15,000	£5,000	£0
BL5 Eaves Lane	£50,000	£50,000	£45,000	£40,000	£35,000	£30,000	£25,000	£20,000	£15,000	£10,000	£5,000
H39 Redhills Road	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable	Unviable
BL2 Trentham	£50,000	£50,000	£50,000	£45,000	£40,000	£35,000	£25,000	£20,000	£15,000	£10,000	£5,000
H24 Trentham Fields. Wilson Road	£50,000	£50,000	£50,000	£40,000	£35,000	£30,000	£25,000	£20,000	£15,000	£10,000	£5,000
BL6 Woodhead Lane	£50,000	£50,000	£50,000	£45,000	£40,000	£35,000	£30,000	£20,000	£15,000	£10,000	£5,000
BL8 Hollywall Lane	£50,000	£50,000	£50,000	£45,000	£40,000	£35,000	£30,000	£20,000	£15,000	£10,000	£5,000

Source: HDH (March 2026)

Summary

8.18 This note should be read as an annex to the *Stoke-on-Trent City Council Local Plan Viability Assessment* (HDH, May 2024).

8.19 Since the 2024 WPVA was undertaken, values have increased, build costs have increased, there have been some changes to national policy, and the Council has refined the policies in the draft Local Plan. In order to understand the impact of these changes, and to consider whether or not a full update of the 2024 WPVA is required or whether the Council can continue to rely on the 2024 WPVA, the development appraisals have been updated, and several sets have been re-run.

8.20 This analysis confirms that the updated policy requirements in the draft Plan are appropriate, it is however necessary to note that these results are sensitive to increases in build costs or falls in values. The Council can continue to rely on the *Stoke-on-Trent City Council Local Plan Viability Assessment* (HDH, May 2024).

8.21 As noted in the 2024 WPVA, whilst the Council has a good track record of delivering housing on brownfield sites, it will still be necessary to be cautious in relying on brownfield sites in the five year land supply and overall housing trajectory, as the delivery of these is likely to continue to be challenging. It will be necessary to have regard to the progress of brownfield sites through the development management process and / or commitments from site promoters, and the ongoing public sector interventions.

8.22 Under the Golden Rules, releases of land from the Green Belt are required (subject to viability testing) to make an affordable housing contribution that is 15% above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. In the above analysis 35% affordable housing is presumed on the Green Belt Strategic Sites. Whilst the analysis suggests that this should be achievable, the sensitivity testing suggests at a cautious approach should be taken and a requirement that is more than this should not be sought.

8.23 At this stage the Council's Infrastructure Deliver Plan (IPD) is still being prepared, and the actual site specific strategic infrastructure and mitigation costs are not yet known. There remains uncertainty as to the costs of strategic infrastructure and mitigation, so further sets of appraisals have been run. Sensitivity testing of the s106 cost assumption (up to £50,000 per unit) against varied levels of affordable housing, has been carried out. These will be helpful in refining policy requirements when the site specific costs are known.

8.24 Also, and as set out earlier in the 2024 WPVA, the delivery of any very large site is challenging. It is recommended that the Council engages with the owners and promoters of the Strategic Sites in line with the advice set out in the Harman Guidance, and only includes these sites in the new Local Plan if they can be demonstrated to be viable.

Appendix 1 – Price Paid Data by Area

Newbuild

2021 to 2025

	Flat		House	
Row Labels	**Average of Price paid**	**Average of £ per sqm**	**Average of Price paid**	**Average of £ per sqm**
Abbey Hulton			£195,602	£2,501
Basford & Hartshill			£201,000	£2,161
Blurton			£215,625	£1,881
Boothen			£222,712	£2,602
Bucknall & Eaton Park			£172,600	£2,423
Burslem			£190,966	£2,526
Etruria & Hanley	£65,280	£2,816	£188,011	£2,393
Fenton West & Mount Pleasant			£184,333	
Great Chell & Packmoor			£225,769	£2,505
Hanford, Newstead & Trentham			£351,932	£2,948
Hanley Park, Joiner's Square & Shelton	£66,359	£1,854	£163,074	£2,244
Hartshill Park & Stoke	£58,450	£3,658	£175,475	£2,434
Meir Hay North, Parkhall & Weston Coyney			£238,566	£2,566
Meir Park			£217,126	£2,621
Meir South			£390,000	
Moorcroft & Sneyd Green			£174,538	£2,398
Penkhull & Springfields			£329,646	£3,110
Tunstall			£210,000	£1,945
Grand Total	**£65,231**	**£2,568**	**£238,409**	**£2,632**

2021

	Flat		House	
Row Labels	**Average of Price paid**	**Average of £ per sqm**	**Average of Price paid**	**Average of £ per sqm**
Abbey Hulton			£189,580	£2,435
Boothen			£206,229	£2,473
Bucknall & Eaton Park			£173,250	£2,454
Burslem			£198,828	£2,300
Etruria & Hanley			£188,011	£2,393
Fenton West & Mount Pleasant			£184,333	
Great Chell & Packmoor			£227,495	£2,276
Hanford, Newstead & Trentham			£333,782	£2,644
Hanley Park, Joiner's Square & Shelton			£163,122	£2,260
Hartshill Park & Stoke	£58,450	£3,658	£270,000	£2,434
Meir Park			£257,592	£2,736
Meir South			£390,000	
Moorcroft & Sneyd Green			£170,052	£2,371
Grand Total	**£58,450**	**£3,658**	**£234,318**	**£2,478**

2022

	Flat		House	
Row Labels	**Average of Price paid**	**Average of £ per sqm**	**Average of Price paid**	**Average of £ per sqm**
Abbey Hulton			£207,399	£2,626
Boothen			£233,949	£2,653
Bucknall & Eaton Park			£170,000	£2,299
Burslem			£187,644	£2,539
Etruria & Hanley	£65,280	£2,816		
Great Chell & Packmoor			£213,668	£2,423
Hanford, Newstead & Trentham			£265,996	£2,508
Hanley Park, Joiner's Square & Shelton			£162,500	£2,058
Meir Park			£227,222	£2,846
Moorcroft & Sneyd Green			£187,995	£2,479
Penkhull & Springfields			£314,950	£3,317
Grand Total	**£65,280**	**£2,816**	**£214,230**	**£2,602**

2023

	Flat		House	
Row Labels	**Average of Price paid**	**Average of £ per sqm**	**Average of Price paid**	**Average of £ per sqm**
Boothen			£218,150	£2,748
Burslem			£199,113	£2,516
Great Chell & Packmoor			£233,159	£2,628
Hanford, Newstead & Trentham			£413,640	£3,342
Meir Hay North, Parkhall & Weston Coyney			£228,995	£2,477
Meir Park			£204,718	£2,511
Penkhull & Springfields			£331,669	£3,158
Tunstall			£210,000	£1,945
Grand Total			**£244,714**	**£2,689**

2024

	Flat		House	
Row Labels	**Average of Price paid**	**Average of £ per sqm**	**Average of Price paid**	**Average of £ per sqm**
Abbey Hulton			£189,995	£2,500
Basford & Hartshill			£201,000	£2,161
Blurton			£215,625	£1,881
Burslem			£189,188	£2,558
Great Chell & Packmoor			£243,984	£2,555
Hanford, Newstead & Trentham			£369,725	£3,499
Hanley Park, Joiner's Square & Shelton	£66,359	£1,854		
Hartshill Park & Stoke			£80,950	
Meir Hay North, Parkhall & Weston Coyney			£240,620	£2,616
Meir Park			£224,680	£2,583
Penkhull & Springfields			£329,059	£3,078
Grand Total	**£66,359**	**£1,854**	**£261,831**	**£2,756**

2025

	Flat		House	
Row Labels	**Average of Price paid**	**Average of £ per sqm**	**Average of Price paid**	**Average of £ per sqm**
Burslem			£166,204	£2,867
Hanford, Newstead & Trentham			£330,757	£2,942
Meir Hay North, Parkhall & Weston Coyney			£310,995	£2,753
Meir Park			£213,794	£2,697
Penkhull & Springfields			£327,380	£3,044
Grand Total			**£261,295**	**£2,859**

Non-Newbuild

2021 to 2025

	Flat		House	
Row Labels	**Average of Price paid**	**Average of £ per sqm**	**Average of Price paid**	**Average of £ per sqm**
Abbey Hulton			£155,125	£2,029
Baddeley, Milton & Norton	£103,139	£1,732	£196,666	£2,368
Basford & Hartshill			£180,030	£2,160
Bentilee, Ubberley & Townsend	£104,500	£1,516	£158,663	£1,955
Birches Head & Northwood	£74,480	£1,674	£165,889	£2,214
Blurton	£68,945	£1,590	£185,980	£2,290
Boothen	£102,214	£1,697	£174,919	£2,103
Bradeley & Chell Heath	£83,000	£1,609	£145,806	£2,114
Brown Edge and Endon			£249,667	£2,575
Bucknall & Eaton Park	£71,000	£1,269	£163,001	£2,203
Burslem	£83,171	£1,710	£152,051	£2,024
Burslem Park	£109,500	£1,831	£161,168	£2,051
Dresden & Florence	£107,866	£1,662	£185,292	£2,237
Etruria & Hanley	£86,214	£1,623	£159,882	£2,161
Fenton East	£80,766	£1,742	£135,457	£2,178
Fenton West & Mount Pleasant	£73,190	£1,410	£137,399	£1,980
Ford Green & Smallthorne	£91,461	£1,712	£197,590	£2,139
Goldenhill & Sandyford	£52,000	£1,406	£183,286	£2,189
Great Chell & Packmoor	£70,000	£1,273	£180,422	£2,260
Hanford, Newstead & Trentham	£111,760	£1,855	£252,339	£2,745
Hanley Park, Joiner's Square & Shelton	£86,669	£1,712	£149,354	£1,882
Hartshill Park & Stoke	£96,310	£1,921	£171,671	£1,990
Hollybush	£96,705	£1,598	£169,373	£2,084
Lightwood North & Normacot	£208,475	£2,584	£220,751	£2,487
Little Chell & Stanfield			£166,490	£2,003
Longton & Meir Hay South	£369,625	£7,014	£157,231	£2,419
Meir Hay North, Parkhall & Weston Coyney	£78,050	£1,805	£183,628	£2,479
Meir North	£93,000	£1,528	£142,939	£1,957
Meir Park			£236,216	£2,857
Meir South	£132,083	£8,226	£206,385	£2,182
Moorcroft & Sneyd Green	£77,719	£1,665	£165,225	£2,034
Penkhull & Springfields	£100,968	£1,842	£184,152	£2,173
Sandford Hill			£150,684	£2,232
Town			£190,000	£2,023
Trent Vale & Oak Hill	£77,000	£2,335	£159,754	£1,979
Tunstall			£148,431	£1,928
Werrington			£408,333	£3,234
Grand Total	**£93,513**	**£1,836**	**£182,766**	**£2,266**

2021

	Flat		House	
Row Labels	**Average of Price paid**	**Average of £ per sqm**	**Average of Price paid**	**Average of £ per sqm**
Abbey Hulton			£147,060	£1,933
Baddeley, Milton & Norton	£82,600	£1,596	£193,670	£2,279
Basford & Hartshill			£173,695	£2,081
Bentilee, Ubberley & Townsend			£143,415	£1,885
Birches Head & Northwood	£74,000	£1,821	£162,757	£2,133
Blurton	£55,000	£1,310	£187,991	£2,167
Boothen	£126,124	£1,910	£171,792	£2,082
Bradeley & Chell Heath	£85,000	£1,637	£136,262	£2,037
Brown Edge and Endon			£224,000	£2,115
Bucknall & Eaton Park			£150,978	£2,055
Burslem	£70,998	£1,522	£135,180	£1,946
Burslem Park	£111,000	£1,501	£159,322	£1,975
Dresden & Florence	£94,700	£1,611	£172,790	£2,057
Etruria & Hanley	£80,000	£1,821	£149,290	£1,937
Fenton East	£75,080	£1,548	£126,619	£1,996
Fenton West & Mount Pleasant	£63,750	£1,378	£128,729	£1,972
Ford Green & Smallthorne	£84,232	£1,550	£194,307	£2,084
Goldenhill & Sandyford			£160,070	£1,968
Great Chell & Packmoor			£177,332	£2,161
Hanford, Newstead & Trentham	£122,222	£1,812	£238,440	£2,572
Hanley Park, Joiner's Square & Shelton	£79,038	£1,701	£136,745	£1,747
Hartshill Park & Stoke	£89,314	£1,823	£160,910	£1,986
Hollybush	£94,500	£1,433	£151,533	£1,953
Lightwood North & Normacot			£216,212	£2,335
Little Chell & Stanfield			£161,907	£2,059
Longton & Meir Hay South			£145,741	£2,243
Meir Hay North, Parkhall & Weston Coyney	£73,625	£1,656	£160,393	£2,232
Meir North	£93,000	£1,528	£151,813	£1,976
Meir Park			£225,363	£2,567
Meir South			£195,720	£2,123
Moorcroft & Sneyd Green	£63,000	£1,500	£153,138	£1,900
Penkhull & Springfields	£105,250	£1,850	£177,361	£2,022
Sandford Hill			£138,813	£2,160
Trent Vale & Oak Hill			£159,025	£1,851
Tunstall			£140,148	£1,847
Grand Total	**£86,706**	**£1,681**	**£176,773**	**£2,167**

2022

	Flat		House	
Row Labels	**Average of Price paid**	**Average of £ per sqm**	**Average of Price paid**	**Average of £ per sqm**
Abbey Hulton			£152,916	£2,095
Baddeley, Milton & Norton	£144,333	£1,480	£196,299	£2,347
Basford & Hartshill			£180,511	£2,141
Bentilee, Ubberley & Townsend			£155,321	£1,899
Birches Head & Northwood	£71,563	£1,652	£160,726	£2,260
Blurton	£72,500	£1,770	£186,125	£2,261
Boothen	£100,125	£1,787	£178,700	£2,200
Bradeley & Chell Heath			£142,919	£2,086
Bucknall & Eaton Park			£163,215	£2,192
Burslem	£68,000	£1,526	£148,227	£2,005
Burslem Park	£108,000	£2,161	£165,892	£2,293
Dresden & Florence	£118,500	£1,534	£185,355	£2,215
Etruria & Hanley	£84,995	£1,492	£155,772	£2,110
Fenton East	£72,483	£1,712	£134,232	£2,201
Fenton West & Mount Pleasant	£87,500	£1,412	£138,281	£1,991
Ford Green & Smallthorne	£91,344	£1,789	£199,242	£2,147
Goldenhill & Sandyford			£194,085	£2,309
Great Chell & Packmoor			£178,052	£2,276
Hanford, Newstead & Trentham	£112,038	£1,809	£259,722	£2,732
Hanley Park, Joiner's Square & Shelton	£83,389	£1,727	£150,757	£1,885
Hartshill Park & Stoke	£96,414	£1,932	£176,010	£2,012
Hollybush	£102,917	£1,719	£166,076	£2,022
Lightwood North & Normacot			£210,109	£2,489
Little Chell & Stanfield			£171,650	£1,925
Longton & Meir Hay South	£369,625	£7,014	£159,721	£2,403
Meir Hay North, Parkhall & Weston Coyney			£189,332	£2,519
Meir North			£136,547	£1,990
Meir Park			£244,799	£2,917
Meir South			£231,199	£2,303
Moorcroft & Sneyd Green	£72,375	£1,671	£167,073	£2,025
Penkhull & Springfields	£95,304	£1,856	£186,082	£2,160
Sandford Hill			£150,963	£2,277
Town			£190,000	£2,023
Trent Vale & Oak Hill	£77,000	£2,335	£162,720	£2,145
Tunstall			£157,155	£1,980
Werrington			£505,000	£3,799
Grand Total	**£96,423**	**£1,882**	**£183,660**	**£2,269**

2023

	Flat		House	
Row Labels	**Average of Price paid**	**Average of £ per sqm**	**Average of Price paid**	**Average of £ per sqm**
Abbey Hulton			£154,963	£2,017
Baddeley, Milton & Norton	£150,000	£2,312	£191,309	£2,331
Basford & Hartshill			£191,545	£2,181
Bentilee, Ubberley & Townsend	£104,500	£1,516	£177,891	£1,944
Birches Head & Northwood	£85,000	£1,598	£173,648	£2,184
Blurton	£75,000	£1,364	£170,107	£2,277
Boothen	£86,250	£1,395	£178,750	£2,205
Bradeley & Chell Heath			£145,926	£2,096
Brown Edge and Endon			£275,000	£2,597
Bucknall & Eaton Park			£158,328	£2,121
Burslem	£127,840	£2,165	£147,798	£2,034
Burslem Park			£156,314	£1,943
Dresden & Florence	£103,374	£1,706	£181,602	£2,204
Etruria & Hanley	£93,000	£1,576	£166,889	£2,328
Fenton East	£80,000	£1,635	£137,683	£1,976
Fenton West & Mount Pleasant	£83,000	£1,385	£136,775	£2,018
Ford Green & Smallthorne	£97,208	£1,725	£204,671	£2,103
Goldenhill & Sandyford			£166,927	£2,109
Great Chell & Packmoor			£175,746	£2,226
Hanford, Newstead & Trentham	£106,500	£1,839	£250,793	£2,785
Hanley Park, Joiner's Square & Shelton	£94,860	£1,716	£157,664	£1,876
Hartshill Park & Stoke	£106,250	£1,656	£171,338	£2,014
Hollybush	£95,750	£1,698	£169,715	£2,053
Lightwood North & Normacot	£208,475	£2,584	£216,585	£2,589
Little Chell & Stanfield			£174,983	£2,137
Longton & Meir Hay South			£154,683	£2,417
Meir Hay North, Parkhall & Weston Coyney	£75,500	£1,829	£189,132	£2,546
Meir North			£140,501	£1,860
Meir Park			£238,196	£2,959
Meir South	£241,250	£21,892	£190,355	£2,055
Moorcroft & Sneyd Green	£72,000	£1,618	£167,358	£1,992
Penkhull & Springfields	£101,045	£1,967	£188,366	£2,208
Sandford Hill			£161,574	£2,242
Trent Vale & Oak Hill			£170,302	£2,064
Tunstall			£156,138	£1,942
Grand Total	**£102,938**	**£2,153**	**£182,093**	**£2,253**

2024

Row Labels	Flat Average of Price paid	Average of £ per sqm	House Average of Price paid	Average of £ per sqm
Abbey Hulton			£150,235	£1,890
Baddeley, Milton & Norton	£101,000	£1,803	£198,618	£2,420
Basford & Hartshill			£183,400	£2,251
Bentilee, Ubberley & Townsend			£156,064	£2,105
Birches Head & Northwood	£57,167	£1,548	£162,872	£2,219
Blurton	£75,500	£1,843	£188,281	£2,386
Boothen	£83,833	£1,462	£174,998	£2,170
Bradeley & Chell Heath	£82,000	£1,595	£153,685	£2,221
Brown Edge and Endon			£250,000	£3,013
Bucknall & Eaton Park			£171,533	£2,266
Burslem	£75,725	£1,612	£175,157	£1,970
Burslem Park			£168,324	£2,095
Dresden & Florence	£124,667	£1,809	£182,754	£2,357
Etruria & Hanley	£97,750	£1,801	£150,170	£2,033
Fenton East	£95,500	£2,074	£136,106	£2,253
Fenton West & Mount Pleasant	£55,500	£1,379	£142,707	£2,010
Ford Green & Smallthorne	£90,344	£1,708	£210,165	£2,257
Goldenhill & Sandyford			£195,835	£2,235
Great Chell & Packmoor	£70,000	£1,273	£169,472	£2,189
Hanford, Newstead & Trentham	£103,711	£1,902	£267,204	£2,870
Hanley Park, Joiner's Square & Shelton	£91,516	£1,671	£151,949	£1,929
Hartshill Park & Stoke	£91,929	£2,270	£171,216	£1,942
Hollybush	£95,500	£1,605	£181,925	£2,224
Lightwood North & Normacot			£227,239	£2,499
Little Chell & Stanfield			£158,530	£1,902
Longton & Meir Hay South			£160,444	£2,422
Meir Hay North, Parkhall & Weston Coyney	£79,500	£1,643	£191,261	£2,535
Meir North			£141,816	£1,952
Meir Park			£244,578	£3,117
Meir South	£77,500	£1,392	£202,446	£2,222
Moorcroft & Sneyd Green	£90,000	£1,748	£169,390	£2,115
Penkhull & Springfields	£109,571	£1,749	£185,550	£2,277
Sandford Hill			£145,561	£2,172
Trent Vale & Oak Hill			£149,778	£1,842
Tunstall			£149,166	£1,924
Grand Total	**£90,062**	**£1,722**	**£186,442**	**£2,311**

2025

	Flat		House	
Row Labels	**Average of Price paid**	**Average of £ per sqm**	**Average of Price paid**	**Average of £ per sqm**
Abbey Hulton			£170,526	£2,203
Baddeley, Milton & Norton	£81,500	£1,745	£205,282	£2,503
Basford & Hartshill			£170,131	£2,136
Bentilee, Ubberley & Townsend			£158,620	£1,934
Birches Head & Northwood	£86,190	£1,548	£171,140	£2,262
Blurton	£70,238	£1,615	£199,526	£2,386
Boothen	£102,000	£1,791	£172,276	£1,915
Bradeley & Chell Heath			£151,205	£2,150
Bucknall & Eaton Park	£71,000	£1,269	£176,355	£2,480
Burslem	£69,500	£1,650	£154,035	£2,143
Burslem Park			£154,734	£1,929
Dresden & Florence	£120,000	£1,560	£207,174	£2,360
Etruria & Hanley	£75,000	£1,435	£178,054	£2,377
Fenton East			£143,773	£2,385
Fenton West & Mount Pleasant	£89,133	£1,471	£139,314	£1,916
Ford Green & Smallthorne	£98,273	£1,768	£183,411	£2,147
Goldenhill & Sandyford	£52,000	£1,406	£196,413	£2,329
Great Chell & Packmoor			£202,197	£2,465
Hanford, Newstead & Trentham	£117,500	£2,196	£246,971	£2,869
Hanley Park, Joiner's Square & Shelton	£88,833	£1,736	£147,400	£1,967
Hartshill Park & Stoke	£101,063	£1,809	£181,364	£2,001
Hollybush	£91,750	£1,477	£183,239	£2,202
Lightwood North & Normacot			£240,821	£2,645
Little Chell & Stanfield			£162,188	£2,041
Longton & Meir Hay South			£169,466	£2,675
Meir Hay North, Parkhall & Weston Coyney	£88,000	£2,241	£194,541	£2,639
Meir North			£149,676	£2,048
Meir Park			£234,722	£2,933
Meir South			£212,200	£2,224
Moorcroft & Sneyd Green			£173,861	£2,238
Penkhull & Springfields	£98,556	£1,734	£185,151	£2,255
Sandford Hill			£160,188	£2,316
Trent Vale & Oak Hill			£158,421	£2,002
Tunstall			£140,411	£1,958
Werrington			£360,000	£2,952
Grand Total	**£89,773**	**£1,712**	**£185,955**	**£2,353**

Appendix 2 – Newbuild Asking Prices, February 2026

Average Asking Prices - £

	Average Asking price £	Average Asking price £ per sqm
Barratt		
Waterside	£329,995	£3,395
Bellway		
The Crescent	£295,498	£2,870
Gleeson Homes		
Hawthorns	£289,995	£2,231
Keepmoat		
Hollington Grange	£244,328	£2,592
Lioncourt		
Queen's Gate	£332,950	£3,005
Oak-Ngate		
New Inn Lane	£498,328	
Persimmon		
Foxfields	£287,450	£3,268
St Modwen		
Kiln Gate	£170,000	£2,615
Grand Total	**£307,336**	**£2,857**

Appendix 3 – Derivation of Affordable Housing Value Assumptions

Social Rent

General needs (social rent)
Average weekly rent (£ per week) and unit counts by unit size for Stoke-on-Trent - large PRPs

Unit Size	£ per week				
	Net rent	Formula rent	Service charge^	Gross rent^	Unit count
Non-self-contained					
Bedsit	£73.97	£73.10	£28.24	£100.04	13
1 Bedroom	£84.51	£84.70	£10.10	£94.32	1,291
2 Bedroom	£92.10	£92.87	£5.00	£94.88	2,373
3 Bedroom	£106.77	£108.31	£2.35	£107.68	1,054
4 Bedroom	£124.46	£125.53	£4.96	£126.13	83
5 Bedroom					
6+ Bedroom	£151.96	£150.26	£5.38	£155.55	3
All self-contained	£93.82	£94.61	£6.85	£98.12	4,817
All stock sizes	**£93.82**	**£94.61**	**£6.85**	**£98.12**	**4,817**

Owned stock. Large PRPs only - unweighted. Excludes Affordable Rent and intermediate rent, but includes other units with an exception under the Rent Policy Statement. Stock outside England is excluded.

Source: SDR 2025

Source: Table 9, SDR 2025 – Data Tool

Affordable Rent

Affordable Rent general needs
Average weekly gross rent (£ per week) and unit counts by unit size for Stoke on Tent

Unit Size	£ per week Gross rent	Unit count
Non-self-contained	-	-
Bedsit	-	-
1 Bedroom	£101.20	86
2 Bedroom	£114.22	370
3 Bedroom	£130.92	299
4 Bedroom	£154.02	25
5 Bedroom	£162.21	2
6+ Bedroom	-	-
All self-contained	£120.57	782
All stock sizes	**£120.57**	**782**

Owned stock. All PRPs owning Affordable Rent units - unweighted. Stock outside England is excluded.
Source: SDR 2025

Source: Table 1, SDR 2025 – Data Tool

BRMA LHA Caps

	Per week	Per month	Per year
Shared	£69.35	£300.52	£3,606.20
One Bedroom	£97.81	£423.84	£5,086.12
Two Bedrooms	£110.47	£478.70	£5,744.44
Three Bedrooms	£136.93	£593.36	£7,120.36
Four Bedrooms	£184.11	£797.81	£9,573.72

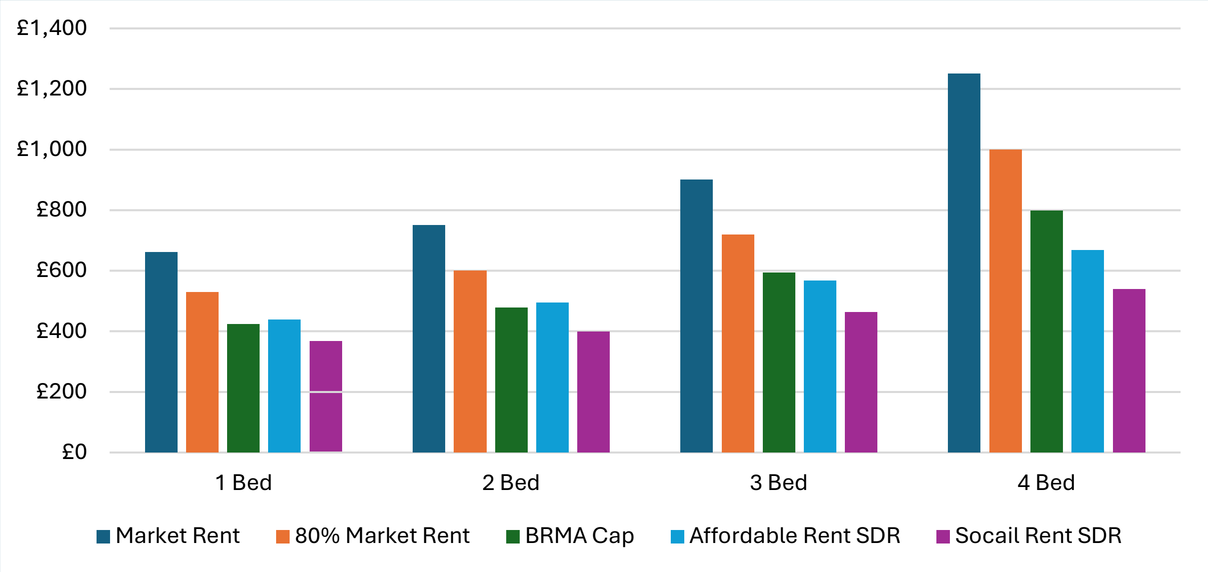
Source: VOA (February 2026)

Average Asking Rents

2026 Median Houses	**1 Bed**	**2 Bed**	**3 Bed**	**4 Bed**
Stoke Council	£660	£775	£895	£1,250
Penkhull		£795	£937	
Hanley		£737	£860	£1,250
Longton		£850	£875	
Trentham		£937	£1,200	
Ubberley		£895	£900	
Baddeley Green				
Baddeley Edge	£725			
Norton in the Moors		£825	£875	
Tunstall		£700	£823	£1,200
Great Chell		£700	£850	
2026 Median Flats	**1 Bed**	**2 Bed**	**3 Bed**	**4 Bed**
Stoke Council	£650	£700		
Penkhull	£675	£700		
Hanley	£625	£775		
Longton	£700			
Trentham				
Ubberley				
Baddeley Green				
Baddeley Edge				
Norton in the Moors		£800		
Tunstall				
Great Chell				

Source: Market Survey (February 2026)

Rents by Tenure – £/Month



Source: Market Survey, SDR and VOA (February 2026)

Capitalisation of Social Rents

	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
Rent (£/month)	£366	£399	£463	£539
Rent (£/annum)	£4,395	£4,789	£5,552	£6,472
Net Rent	£3,516	£3,831	£4,442	£5,178
Value	£78,125	£85,141	£98,703	£115,056
sqm	50	70	84	97
£ per sqm	£1,562	£1,216	£1,175	£1,186

Source: HDH (February 2026)

Capitalisation of Affordable Rents

	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
Rent (£/month)	£424	£479	£593	£798
Rent (£/annum)	£5,086	£5,744	£7,120	£9,574
Net Rent	£4,069	£4,596	£5,696	£7,659
Value	£90,420	£102,123	£126,584	£170,199
sqm	50	70	84	97
£ per sqm	£1,808	£1,459	£1,507	£1,755

Source: HDH (February 2026)

Appendix 4 Sensitivity Testing Based on Full Policy Requirements

Typologies

Change in Values

			EUV	BLV	Residual Value (£ per gross ha)						
				Value	-10%	-5%	0%	+5%	+10%	+15%	+20%
Site 1	Greenfield 700	SoTCC	25,000	325,000	501,147	682,502	860,112	1,037,721	1,215,331	1,392,940	1,570,550
Site 2	Greenfield 240	SoTCC	25,000	325,000	593,953	799,072	1,004,191	1,209,310	1,412,461	1,613,974	1,815,487
Site 3	Greenfield 120	SoTCC	25,000	325,000	-51,566	161,340	369,604	577,869	786,133	994,397	1,202,661
Site 4	Greenfield 80	SoTCC	25,000	325,000	-367,697	-154,290	52,920	251,334	448,858	646,383	843,908
Site 5	Greenfield 40	SoTCC	25,000	325,000	-322,990	-105,865	106,759	311,253	513,996	716,740	919,483
Site 6	Greenfield 20	SoTCC	25,000	325,000	-177,682	46,218	268,815	484,147	697,535	910,923	1,124,311
Site 7	Greenfield 12	SoTCC	25,000	325,000	10,696	236,081	459,078	676,812	891,617	1,106,421	1,321,226
Site 8	Greenfield 8	SoTCC	25,000	325,000	306,838	828,933	1,339,860	1,838,926	2,337,992	2,837,058	3,336,124
Site 9	Greenfield 4	SoTCC	25,000	325,000	-376,791	199,286	775,363	1,351,441	1,917,807	2,479,717	3,028,749
Site 10	HD Green 120	SoTCC	25,000	325,000	198,758	679,460	1,160,161	1,640,862	2,121,564	2,602,265	3,082,966
Site 11	HD Green 80	SoTCC	25,000	325,000	-466,586	-42,924	367,167	768,341	1,169,515	1,570,690	1,971,864
Site 12	HD Green 20	SoTCC	25,000	325,000	-125,814	384,678	885,925	1,372,451	1,858,976	2,345,501	2,832,026
Site 13	Mixed 240	SoTCC	250,000	300,000	306,414	539,110	767,560	996,011	1,224,462	1,452,913	1,679,804
Site 14	Mixed 80	SoTCC	250,000	300,000	-533,916	-274,614	-23,723	219,820	457,935	696,051	934,167
Site 15	Mixed 40	SoTCC	250,000	300,000	-645,873	-342,701	-48,517	241,789	520,421	798,821	1,077,221
Site 16	Mixed 20	SoTCC	250,000	300,000	-573,512	-85,287	398,202	873,079	1,333,870	1,794,660	2,255,451
Site 17	Mixed 12	SoTCC	250,000	300,000	-500,918	-32,840	433,477	898,468	1,355,774	1,801,032	2,245,456
Site 18	Mixed 8	SoTCC	250,000	300,000	363,288	1,027,017	1,682,169	2,325,890	2,958,458	3,591,026	4,223,594
Site 19	Mixed 4	SoTCC	250,000	300,000	319,675	1,002,884	1,686,094	2,369,303	3,041,715	3,711,722	4,375,378
Site 20	Brownfield 320	SoTCC	475,000	570,000	-1,876,900	-1,284,082	-719,833	-211,776	266,070	713,798	1,160,187
Site 21	Brownfield 120	SoTCC	475,000	570,000	-2,167,822	-1,648,784	-1,138,222	-638,115	-151,976	320,319	779,564
Site 22	Brownfield 80	SoTCC	475,000	570,000	-2,235,964	-1,705,812	-1,185,480	-673,098	-173,961	313,596	784,113
Site 23	Brownfield 40	SoTCC	475,000	570,000	-2,400,519	-1,873,496	-1,349,270	-831,946	-322,130	176,327	660,850
Site 24	Brownfield 20	SoTCC	475,000	570,000	-3,043,103	-2,390,267	-1,748,029	-1,105,792	-470,001	148,814	765,186
Site 25	Brownfield 12	SoTCC	475,000	570,000	-2,547,026	-1,849,710	-1,163,175	-485,910	173,608	833,126	1,484,452
Site 26	Brownfield 8	SoTCC	475,000	570,000	-1,466,633	-650,870	136,483	923,836	1,709,101	2,481,239	3,236,997
Site 27	Brown Flats 80	SoTCC	475,000	570,000	-5,490,096	-5,055,138	-4,620,181	-4,188,716	-3,761,764	-3,334,812	-2,907,860
Site 28	Brown Flats 40	SoTCC	475,000	570,000	-5,958,928	-5,431,068	-4,903,208	-4,375,348	-3,847,488	-3,319,628	-2,791,769
Site 29	Brown Flats 12	SoTCC	475,000	570,000	-5,753,386	-5,239,286	-4,725,186	-4,211,086	-3,697,236	-3,192,598	-2,687,960
Site 30	Brown Flats 8	SoTCC	475,000	570,000	-5,894,247	-5,409,264	-4,924,282	-4,439,299	-3,954,317	-3,471,687	-2,995,630

Change in Costs

			EUV	BLV	**Residual Value** (£ per gross ha)						
				BCIS	-10%	-5%	0%	+5%	+10%	+15%	+20%
Site 1	Greenfield 700	SoTCC	25,000	325,000	1,151,828	1,005,970	860,112	714,254	564,420	414,332	262,761
Site 2	Greenfield 240	SoTCC	25,000	325,000	1,336,764	1,172,043	1,004,191	836,340	668,488	500,637	329,164
Site 3	Greenfield 120	SoTCC	25,000	325,000	777,637	573,621	369,604	165,588	-42,651	-257,852	-479,669
Site 4	Greenfield 80	SoTCC	25,000	325,000	470,646	262,227	52,920	-165,721	-390,726	-618,533	-849,647
Site 5	Greenfield 40	SoTCC	25,000	325,000	529,556	319,033	106,759	-114,028	-339,241	-568,149	-798,961
Site 6	Greenfield 20	SoTCC	25,000	325,000	695,738	483,248	268,815	47,161	-175,796	-405,326	-636,384
Site 7	Greenfield 12	SoTCC	25,000	325,000	878,799	670,403	459,078	242,806	24,145	-194,516	-419,814
Site 8	Greenfield 8	SoTCC	25,000	325,000	2,172,594	1,756,227	1,339,860	914,029	480,384	43,507	-393,371
Site 9	Greenfield 4	SoTCC	25,000	325,000	1,790,167	1,286,363	775,363	264,363	-246,636	-767,074	-1,296,641
Site 10	HD Green 120	SoTCC	25,000	325,000	2,071,631	1,615,896	1,160,161	704,426	248,691	-222,760	-707,539
Site 11	HD Green 80	SoTCC	25,000	325,000	1,188,726	777,946	367,167	-53,002	-486,132	-932,775	-1,384,013
Site 12	HD Green 20	SoTCC	25,000	325,000	1,835,724	1,360,824	885,925	396,877	-101,416	-603,312	-1,119,711
Site 13	Mixed 240	SoTCC	250,000	300,000	1,183,781	975,671	767,560	559,450	346,765	130,842	-93,567
Site 14	Mixed 80	SoTCC	250,000	300,000	497,455	239,579	-23,723	-295,701	-576,090	-859,725	-1,147,502
Site 15	Mixed 40	SoTCC	250,000	300,000	569,696	266,658	-48,517	-369,042	-698,554	-1,029,704	-1,364,657
Site 16	Mixed 20	SoTCC	250,000	300,000	1,359,626	885,957	398,202	-98,800	-600,053	-1,115,113	-1,630,174
Site 17	Mixed 12	SoTCC	250,000	300,000	1,401,700	921,668	433,477	-56,496	-548,481	-1,056,229	-1,567,560
Site 18	Mixed 8	SoTCC	250,000	300,000	2,764,006	2,228,664	1,682,169	1,129,033	567,319	5,606	-556,107
Site 19	Mixed 4	SoTCC	250,000	300,000	2,841,004	2,266,970	1,686,094	1,105,217	524,341	-56,536	-638,679
Site 20	Brownfield 320	SoTCC	475,000	570,000	379,236	-149,740	-719,833	-1,351,811	-2,012,357	-2,672,903	-3,333,449
Site 21	Brownfield 120	SoTCC	475,000	570,000	10,668	-554,642	-1,138,222	-1,732,921	-2,336,094	-2,946,376	-3,558,823
Site 22	Brownfield 80	SoTCC	475,000	570,000	-5,631	-586,668	-1,185,480	-1,792,713	-2,409,777	-3,028,460	-3,652,175
Site 23	Brownfield 40	SoTCC	475,000	570,000	-160,304	-748,862	-1,349,270	-1,956,794	-2,567,116	-3,183,280	-3,802,782
Site 24	Brownfield 20	SoTCC	475,000	570,000	-255,399	-995,530	-1,748,029	-2,500,529	-3,263,308	-4,027,689	-4,792,071
Site 25	Brownfield 12	SoTCC	475,000	570,000	342,110	-401,659	-1,163,175	-1,936,038	-2,719,681	-3,503,451	-4,299,019
Site 26	Brownfield 8	SoTCC	475,000	570,000	1,654,057	895,772	136,483	-622,806	-1,405,999	-2,192,838	-2,991,037
Site 27	Brown Flats 80	SoTCC	475,000	570,000	-3,262,027	-3,938,848	-4,620,181	-5,305,709	-5,991,236	-6,676,764	-7,362,292
Site 28	Brown Flats 40	SoTCC	475,000	570,000	-3,315,092	-4,109,150	-4,903,208	-5,697,266	-6,491,324	-7,285,382	-8,087,795
Site 29	Brown Flats 12	SoTCC	475,000	570,000	-3,180,049	-3,950,997	-4,725,186	-5,499,375	-6,273,564	-7,047,753	-7,821,942
Site 30	Brown Flats 8	SoTCC	475,000	570,000	-3,425,025	-4,174,653	-4,924,282	-5,673,910	-6,423,539	-7,173,167	-7,922,796

Strategic Sites

Change in Values

			EUV	BLV	Residual Value (£ per gross ha)						
				Value	-10%	-5%	0%	+5%	+10%	+15%	+20%
Site 32	BL1 Lightwood	Meir South	25,000	250,000	49,698	161,136	268,945	374,536	479,089	582,524	685,601
Site 33	BL9 Chatterley Whitfield	Baddeley, Milton & Nor	25,000	250,000	98,276	236,730	373,049	506,677	639,708	772,739	903,867
Site 34	H58 Packmoor	Great Chell & Packmoc	25,000	250,000	113,733	274,520	432,437	588,679	744,920	898,789	1,052,000
Site 35	BL5 Eaves lane	Abbey Hulton	25,000	250,000	157,034	319,208	480,942	638,629	796,201	953,773	1,111,094
Site 36	H39 Redhills Road	Baddeley, Milton & Nor	475,000	570,000	-290,811	-131,881	10,945	141,536	269,179	395,184	520,392
Site 37	BL2 Trentham	Hanford, Newstead & Tı	25,000	250,000	179,067	353,659	525,424	697,190	868,956	1,039,506	1,207,910
Site 38	H24 Trentham Fields. Wilson Rd	Hanford, Newstead & Tı	25,000	250,000	333,433	528,164	721,066	913,968	1,106,869	1,299,771	1,491,755
Site 39	BL6 Woodhead Lane	Abbey Hulton	25,000	250,000	187,447	367,961	547,449	722,971	898,494	1,074,016	1,249,538
Site 40	BL8 Hollywall Lane	Goldenhill & Sandyford	25,000	250,000	190,589	370,348	550,108	727,741	902,981	1,078,222	1,253,462

Change in Costs

			EUV	BLV	Residual Value (£ per gross ha)						
				BCIS	-10%	-5%	0%	+5%	+10%	+15%	+20%
Site 32	BL1 Lightwood	Meir South	25,000	250,000	466,736	368,682	268,945	166,647	60,749	-52,526	-177,037
Site 33	BL9 Chatterley Whitfield	Baddeley, Milton & Nor	25,000	250,000	621,827	497,736	373,049	245,347	115,431	-19,141	-165,519
Site 34	H58 Packmoor	Great Chell & Packmoc	25,000	250,000	720,501	576,761	432,437	286,183	137,059	-17,577	-184,225
Site 35	BL5 Eaves lane	Abbey Hulton	25,000	250,000	771,683	626,370	480,942	331,088	180,925	25,186	-142,431
Site 36	H39 Redhills Road	Baddeley, Milton & Nor	475,000	570,000	270,582	142,614	10,945	-133,084	-289,063	-472,526	-657,611
Site 37	BL2 Trentham	Hanford, Newstead & Tı	25,000	250,000	842,226	683,825	525,424	367,023	205,683	41,233	-133,001
Site 38	H24 Trentham Fields. Wilson Rd	Hanford, Newstead & Tı	25,000	250,000	1,045,143	883,105	721,066	559,027	395,846	227,893	59,940
Site 39	BL6 Woodhead Lane	Abbey Hulton	25,000	250,000	870,239	708,844	547,449	381,694	214,912	48,130	-131,965
Site 40	BL8 Hollywall Lane	Goldenhill & Sandyford	25,000	250,000	873,559	713,030	550,108	384,538	218,967	53,205	-126,559

Appendix 5 Sensitivity Testing – Affordable Housing

Typologies

			EUV	BLV	**Residual Value** (£ per gross ha)										
				Affordable %	0%	5%	10%	15%	20%	25%	30%	35%	40%	45%	50%
Site 1	Greenfield 700	SoTCC	25,000	325,000	1,329,464	1,234,511	1,141,508	1,048,068	955,066	860,112	767,110	673,669	580,667	485,320	391,116
Site 2	Greenfield 240	SoTCC	25,000	325,000	1,536,057	1,429,684	1,323,311	1,216,937	1,110,564	1,004,191	897,818	791,445	685,072	578,699	472,326
Site 3	Greenfield 120	SoTCC	25,000	325,000	899,605	789,259	689,778	579,431	479,951	369,604	270,123	159,777	60,296	-54,845	-159,380
Site 4	Greenfield 80	SoTCC	25,000	325,000	502,148	412,481	322,813	233,145	143,477	52,920	-41,120	-135,206	-230,604	-328,307	-426,009
Site 5	Greenfield 40	SoTCC	25,000	325,000	557,759	458,775	382,627	283,642	207,494	106,759	26,966	-76,894	-156,794	-263,189	-346,194
Site 6	Greenfield 20	SoTCC	25,000	325,000	750,431	635,843	545,641	431,053	385,348	268,815	175,473	55,239	7,283	-112,951	-208,466
Site 7	Greenfield 12	SoTCC	25,000	325,000	1,049,969	962,760	843,273	756,065	668,704	459,078	369,342	369,342	278,458	153,085	-30,084
Site 8	Greenfield 8	SoTCC	25,000	325,000	1,339,860	1,339,860	1,339,860	1,339,860	1,339,860	1,339,860	1,339,860	1,339,860	1,339,860	1,339,860	1,339,860
Site 9	Greenfield 4	SoTCC	25,000	325,000	775,363	775,363	775,363	775,363	775,363	775,363	775,363	775,363	775,363	775,363	775,363
Site 10	HD Green 120	SoTCC	25,000	325,000	2,374,415	2,121,599	1,893,696	1,640,880	1,412,977	1,160,161	932,258	679,442	451,539	198,723	-36,281
Site 11	HD Green 80	SoTCC	25,000	325,000	1,267,301	1,087,274	907,247	727,220	547,194	367,167	187,140	222	-188,673	-377,568	-573,648
Site 12	HD Green 20	SoTCC	25,000	325,000	1,998,984	1,734,820	1,519,795	1,255,631	1,150,089	885,925	666,252	392,376	281,634	4,458	-221,160
Site 13	Mixed 240	SoTCC	250,000	300,000	1,310,251	1,201,713	1,093,175	984,637	876,099	767,560	659,022	550,484	441,946	333,408	223,188
Site 14	Mixed 80	SoTCC	250,000	300,000	524,651	416,062	307,472	198,883	89,741	-23,723	-137,662	-251,908	-370,206	-488,505	-607,275
Site 15	Mixed 40	SoTCC	250,000	300,000	597,878	456,057	351,659	208,675	100,290	-48,517	-158,058	-307,818	-421,595	-576,106	-689,883
Site 16	Mixed 20	SoTCC	250,000	300,000	1,451,198	1,203,072	1,004,083	753,774	655,464	398,202	189,411	-70,939	-171,186	-431,778	-648,648
Site 17	Mixed 12	SoTCC	250,000	300,000	1,627,406	1,459,970	1,209,555	1,037,266	866,028	433,477	257,792	257,792	82,108	-175,444	-529,517
Site 18	Mixed 8	SoTCC	250,000	300,000	1,682,169	1,682,169	1,682,169	1,682,169	1,682,169	1,682,169	1,682,169	1,682,169	1,682,169	1,682,169	1,682,169
Site 19	Mixed 4	SoTCC	250,000	300,000	1,686,094	1,686,094	1,686,094	1,686,094	1,686,094	1,686,094	1,686,094	1,686,094	1,686,094	1,686,094	1,686,094
Site 20	Brownfield 320	SoTCC	475,000	570,000	42,472	-143,117	-329,029	-524,431	-719,833	-922,173	-1,141,856	-1,367,151	-1,592,447	-1,817,743	-2,043,038
Site 21	Brownfield 120	SoTCC	475,000	570,000	-381,041	-572,636	-756,654	-954,204	-1,138,222	-1,338,694	-1,526,641	-1,732,089	-1,923,536	-2,128,983	-2,324,791
Site 22	Brownfield 80	SoTCC	475,000	570,000	-423,257	-610,449	-802,126	-993,803	-1,185,480	-1,379,304	-1,574,786	-1,770,745	-1,970,189	-2,169,634	-2,369,079
Site 23	Brownfield 40	SoTCC	475,000	570,000	-670,590	-854,337	-1,009,930	-1,193,677	-1,349,270	-1,534,132	-1,693,110	-1,880,770	-2,039,748	-2,227,408	-2,388,915
Site 24	Brownfield 20	SoTCC	475,000	570,000	-843,993	-1,118,649	-1,333,351	-1,608,006	-1,748,029	-2,022,684	-2,237,387	-2,514,849	-2,658,155	-2,938,615	-3,157,999
Site 25	Brownfield 12	SoTCC	475,000	570,000	-353,285	-587,141	-799,641	-1,043,042	-1,163,175	-1,623,154	-1,870,815	-1,870,815	-2,119,705	-2,340,344	-2,711,771
Site 26	Brownfield 8	SoTCC	475,000	570,000	136,483	136,483	136,483	136,483	136,483	136,483	136,483	136,483	136,483	136,483	136,483
Site 27	Brown Flats 80	SoTCC	475,000	570,000	-4,229,496	-4,326,039	-4,422,582	-4,521,151	-4,620,181	-4,719,211	-4,818,241	-4,917,271	-5,016,301	-5,115,331	-5,214,361
Site 28	Brown Flats 40	SoTCC	475,000	570,000	-4,426,334	-4,544,418	-4,664,771	-4,782,855	-4,903,208	-5,021,292	-5,141,646	-5,259,729	-5,380,083	-5,498,166	-5,618,520
Site 29	Brown Flats 12	SoTCC	475,000	570,000	-4,436,588	-4,541,504	-4,628,045	-4,732,961	-4,725,186	-4,916,643	-5,021,559	-5,021,559	-5,126,475	-5,213,017	-5,310,157
Site 30	Brown Flats 8	SoTCC	475,000	570,000	-4,122,162	-4,122,162	-4,361,891	-4,684,553	-4,924,282	-5,063,027	-5,063,027	-5,302,755	-5,625,418	-5,865,147	-5,865,147

Strategic Sites

			EUV	BLV	Residual Value (£ per gross ha)										
				Affordable %	0%	5%	10%	15%	20%	25%	30%	35%	40%	45%	50%
Site 32	BL1 Lightwood	Meir South	25,000	250,000	706,808	644,626	582,451	519,715	457,212	394,476	331,974	268,945	205,583	141,980	77,788
Site 33	BL9 Chatterley Whitfield	Baddeley, Milton & Nor	25,000	250,000	920,560	841,982	763,845	685,916	607,779	529,712	451,574	373,049	293,719	213,949	134,619
Site 34	H58 Packmoor	Great Chell & Packmoo	25,000	250,000	1,069,666	978,633	887,600	796,568	705,535	614,502	523,469	432,437	341,404	249,632	156,796
Site 35	BL5 Eaves lane	Abbey Hulton	25,000	250,000	1,125,300	1,032,851	940,156	849,526	756,831	664,382	573,117	480,942	388,157	294,188	199,926
Site 36	H39 Redhills Road	Baddeley, Milton & Nor	475,000	570,000	206,948	158,035	108,771	59,858	10,945	-42,104	-95,466	-149,092	-205,756	-265,866	-335,741
Site 37	BL2 Trentham	Hanford, Newstead & Tr	25,000	250,000	1,223,422	1,123,093	1,023,427	923,098	825,748	725,419	625,753	525,424	428,074	327,746	228,079
Site 38	H24 Trentham Fields. Wilson Ro	Hanford, Newstead & Tr	25,000	250,000	1,219,671	1,118,005	1,018,353	919,878	820,226	721,066	621,414	522,939	423,287	321,621	218,783
Site 39	BL6 Woodhead Lane	Abbey Hulton	25,000	250,000	1,257,266	1,155,770	1,052,796	951,300	849,803	749,099	645,333	547,449	442,169	338,780	236,858
Site 40	BL8 Hollywall Lane	Goldenhill & Sandyford	25,000	250,000	1,260,785	1,159,602	1,058,418	957,235	856,051	754,868	652,826	550,108	447,389	344,671	241,953

HDH Planning and Development Ltd is a specialist planning consultancy providing evidence to support planning authorities, landowners and developers. The firm is regulated by the RICS.
The main areas of expertise are:

- Community Infrastructure Levy (CIL)
- District wide and site specific Viability Analysis
- Local and Strategic Housing Market Assessments and Housing Needs Assessments

HDH Planning and Development have clients throughout England and Wales.

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