

Mid Sussex District Council

Regulation 19 Viability Note – September 2024

Introduction

- 1.1 HDH Planning & Development Ltd produced the *Local Plan Viability Study* (HDH, May 2022). This had three main elements:
- a. assessing the cumulative impact of the emerging policies, including affordable housing and open space requirements.
 - b. testing the deliverability of the emerging development site allocations that may come forward over the course of the Local Plan.
 - c. considering the ability of development to accommodate developer contributions alongside other policy requirements.
- 1.2 The 2022 Viability Study was undertaken in line with the requirements of the relevant RICS Guidance and the Harman Guidance.
- 1.3 A technical consultation was conducted in early 2022. Representatives of the main developers, development site landowners, their agents, planning agents and consultants working in the area, and housing associations were invited to comment on an early draft of this report. Their comments fed into the final report.
- 1.4 Over the two years, since the 2022 Viability Study 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 the policies in the emerging Local Plan. This brief 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 with the Regulation 19 consultation.
- 1.5 In July 2024 the Government published a draft NPPF for consultation. This includes some major changes to the planning system. The Council plans to submit the Plan for examination before the proposed changes apply. In any event these are considered briefly below.
- 1.6 In December 2023 HDH produced a brief note to consider whether or not the 2022 Viability Study was up to date. This September 2024 note replaces the December 2023 note and further considers how these changes may impact on viability and whether it is necessary for the Council to fully update the viability evidence before submitting the Local Plan for examination.

Changes in House Prices

- 2.1 The residential value assumptions in the 2022 Viability Study were researched gathered in late 2021 and early 2022. There are a range of data sources that can be referenced; however, the Land Registry is the most complete.



Table 2.1 Change in Average House Prices

	Mid Sussex	West Sussex	South East	England & Wales
Dec-21	£399,082	£358,369	£359,997	£279,117
Jun-24	£436,746	£381,090	£382,522	£300,479
Change	£37,664 9.44%	£22,721 6.34%	£22,525 6.26%	£21,362 7.65%

Source: Land Registry (August 2024)

- 2.2 This data shows that average prices have increased by a little less than 10% in Mid Sussex, which is somewhat more than in wider West Sussex and in the Region. This data can be disaggregated and newbuild sales separated out.

Table 2.2 Change in Average Newbuild House Prices – Mid Sussex

	Newbuild	Existing
Dec-21	£497,061	£392,955
Apr-24	£636,806	£415,207
Change	£139,745 28.11%	£22,252 5.66%

Source: Land Registry (August 2024)

- 2.3 The Land Registry’s latest data suggests that the average newbuild sale price has increased by about 28% over the last few years in the Council area. This is substantially more than the average increase of existing homes.
- 2.4 The 2022 Viability Study included data on new build price paid data sourced from Landmark (Tables 4.4 and 4.5 and Figures 4.6 and 4.7). In this note the price paid data from the Land Registry has been married with the floor area data from the EPC Register, for newbuild homes since the start of 2021.

Table 2.3 Price Paid Data by Year – Mid Sussex 2024

	Detached	Flat	Semi-detached	Terraced	All
Count					
2021	269	184	216	80	749
2022	245	77	239	54	615
2023	92	4	61	19	176
2024	0	0	0	1	1
All	606	265	516	154	1541
Average of Price Paid £					
2021	£614,019	£256,921	£426,774	£369,945	£446,226
2022	£629,407	£258,335	£443,009	£430,746	£493,067
2023	£717,240	£252,000	£515,556	£559,841	£619,772
2024				£855,000	£855,000
All	£635,911	£257,258	£444,789	£417,843	£485,006
Average of £ per sqm					
2021	£4,507	£3,966	£4,511	£4,161	£4,339
2022	£4,949	£4,680	£4,913	£4,855	£4,893
2023	£5,055	£4,542	£4,623	£4,971	£4,885
2024				£4,830	£4,830
All	£4,770	£4,187	£4,713	£4,508	£4,625

Source: Land Registry and EPC Register

2.5 The above data compares with that presented in Table 4.6 of the 2022 Viability Study.

Table 2.4 Price Paid Data by Year – Mid Sussex 2022

	Flat	House	All
Count			
2017	143	255	398
2018	113	285	398
2019	122	410	532
2020	136	276	412
2021	17	25	42
All	531	1,251	1,782
Average of Sale Value			
2017	£297,360	£560,240	£465,788
2018	£309,018	£509,631	£452,673
2019	£277,377	£499,279	£448,392
2020	£266,674	£497,286	£421,161
2021	£267,824	£518,021	£416,751
All	£286,445	£513,998	£446,192
Average of £ per sqm			
2017	£4,714	£3,870	£4,171
2018	£4,542	£4,190	£4,290
2019	£4,105	£4,159	£4,147
2020	£4,197	£4,162	£4,173
2021	£4,188	£4,123	£4,149
All	£4,388	£4,107	£4,190

Source: Table 4.6 of the 2022 Viability Study

- 2.6 In both data sets there is little data in the most recent years due to the lag in the Land Registry publishing data. Having said this, the average price paid, on a £ per sqm basis, over 2022, 2023 and 2024 was about £4,890 per sqm. This is an increase of about 17%, although it is important to note that this only includes 1 transaction for the current (2024) year.
- 2.7 A survey of newbuild asking prices was carried out in October 2021, the results of which were presented in Table 4.8 of the 2022 Viability Study. This has been refreshed:

Table 2.5 Survey of Newbuild Asking Prices – August 2024

	Detached	Flat	Semi-detached	Terraced	All
Count					
Burgess Hill	15	15	48	5	83
Copthorne	4	0	3	1	8
Cuckfield	8	0	0	0	8
Felbridge	1	0	9	0	10
Hassocks	13	1	4	4	22
Haywards Heath	9	0	0	0	9
Lindfield	12	8	0	12	32
Pease Pottage	6	2	4	0	12
Sayers Common	1	0	0	0	1
All	69	26	68	22	185
Average Asking Price £					
Burgess Hill	£646,333	£300,333	£451,614	£508,000	£462,861
Copthorne	£549,370		£449,995	£394,995	£492,808
Cuckfield	£786,875				£786,875
Felbridge	£1,875,000		£517,222		£653,000
Hassocks	£709,923	£330,000	£501,625	£418,750	£601,841
Haywards Heath	£736,111				£736,111
Lindfield	£749,833	£295,000		£717,071	£623,839
Pease Pottage	£903,333	£292,500	£508,750		£670,000
Sayers Common	£569,000				£569,000
All	£737,732	£299,231	£466,528	£600,675	£560,120
Average Asking Price £ per sqm					
Burgess Hill	£5,972	£4,638	£5,736	£5,398	£5,560
Copthorne	£4,975		£5,630	£5,725	£5,314
Cuckfield	£6,020				£6,020
Felbridge	£4,759		£5,341		£5,283
Hassocks	£5,335	£4,125	£5,357	£4,618	£5,153
Haywards Heath	£5,573				£5,573
Lindfield	£5,865	£4,630		£5,741	£5,673
Pease Pottage	£5,173	£4,904	£5,579		£5,249
Sayers Common	£4,344				£4,344
All	£5,632	£4,638	£5,648	£5,458	£5,499

Source: Market Survey (August 2024)

- 2.8 In 2021 the average newbuild asking price was £4,746 per sqm, the updated equivalent figure is 16% higher than that in 2021.
- 2.9 The development identified in the new Local Plan will be built out over many years and across development cycles. It is useful to consider how values and costs may change in the future. There is a degree of uncertainty in the housing market as reported by the RICS. The July 2024 RICS UK Residential Market Survey¹ said:

Buyer demand steady over the month while the near-term outlook appears to be brightening

- *New buyer enquiries and agreed sales both hold steady in July*
- *Respondents increasingly anticipate market activity will gain momentum in the months ahead*
- *National house price indicator remains negative but near-term expectations strengthen slightly*

The July 2024 RICS Residential Survey results signal a largely stable trend in market activity, with some of the negativity found previously diminishing slightly. Moreover, likely supported by the modest easing in mortgage interest rates in recent weeks, respondents do now anticipate a meaningful pick-up in sales volumes moving forward.

At the national level, the new buyer enquiries indicator posted a net balance of +2% in July, up from -6% last time. Importantly, this is the first reading in four months that has been outside of negative territory. Even so, the latest figure is still only signalling a broadly stable trend in demand at present, rather than a genuine upturn.

Looking at agreed sales, the July net balance of -2% marks a slight improvement compared to the more downbeat readings of -13% and -6% posted in May and June respectively. Furthermore, respondents appear to be gaining confidence with respect to the prospects for sales activity moving forward. Indeed, a net balance of +30% of survey participants now foresee sales rising over the coming three months. This is up from a net balance of +22% beforehand and marks the strongest reading for the near-term sales expectations series since January 2020. At the twelve-month time horizon, a net balance of +45% of respondents anticipate an increase in sales activity, up slightly from 40% in the June survey.

On the supply front, the new instructions indicator returned a net balance of +2% this month, signalling a broadly flat trend. Similarly, the headline measure of market appraisals is also consistent with a generally stable picture, posting a net balance reading of +1% (unchanged from the previous iteration of the survey).

Meanwhile, the headline measure capturing changes in house prices registered a net balance reading of -19% this month, marginally more negative than -17% last time. When disaggregated, virtually all regions across England exhibit flat or negative net balances for the house price series, with particularly weak readings coming through in East Anglia and Yorkshire & the Humber. Continuing to go against this broader picture however, both Scotland and Northern Ireland once again saw upward moves in house prices according to survey feedback.

Interestingly, the net balance for near-term price expectations (at the headline level) came in at +9% this month, up slightly from +6% in June. Although the latest reading is only marginally in expansionary territory, it does represent the strongest sentiment for the near-term price outlook since April 2022. From a twelve-month perspective, a net balance of +46% of respondents expect prices to be higher in a year's time (slightly up on a reading of +41% seen last month). When broken down, all parts of the UK are anticipated to see some pick-up in house prices over the year ahead, with expectations particularly elevated in Northern Ireland, the East Midlands and London.

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

In the rental market, tenant demand rose modestly according to a net balance of +18% of respondents (part of the seasonally adjusted quarterly lettings dataset). That said, tenant demand growth appears to have softened of late, with the latest net balance noticeably more moderate than the average of +32% seen over the past twelve months.

Alongside this, the new landlord instructions series returned a net balance reading of -16%, which once again suggests the flow of listings coming onto the rental market is deteriorating. Looking ahead, a net balance of +33% of contributors envisage rental prices rising over the coming three months. Although this measure remains indicative of rents remaining on an upward trajectory, the latest readings are the least elevated for the rental expectations metric since Q1 2021.

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

Table 2.2 Consolidated House Price Forecasts

Table 2 - 2024: 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	Aug *	2.4	3.9	-	-	4.50	87.0	-	-
Bloomberg Economics	Mar	2.2	-	-	-	4.00	-	-	-
Capital Economics	Aug *	2.2	3.2	5.8	82.8	4.50	80.0	3.7	2.0
Citigroup	Aug'23	1.7	3.1	2.5	-	3.75	-	-	1.8
HSBC	Aug *	2.9	4.0	5.5	-	4.75	-	-	-
JP Morgan	Aug *	2.7	-	-	-	-	-	4.1	-
KPMG	July	2.8	-	-	-	4.50	84.0	-	-
Morgan Stanley	Dec	2.4	3.7	3.1	-	-	-	-	-
Natwest Markets	Aug *	2.2	3.2	4.9	-	4.75	82.0	3.7	-
Nomura	Mar	1.6	-	-	-	4.25	-	-	-
Pantheon	Aug *	2.7	4.2	-	-	4.75	-	-	-
Societe Generale	Sep	3.3	3.8	4.5	-	4.00	97.3	4.2	-
UBS	Aug *	2.3	3.4	3.9	-	4.75	-	3.6	-
Non-City forecasters									
British Chambers of Commerce	Aug *	2.3	-	3.0	-	4.75	-	-	-
Beacon Economic Forecasting	Aug *	2.4	2.6	4.8	85.0	4.75	84.1	4.7	-
CBI	June	2.3	2.6	4.4	82.0	4.50	86.6	3.0	0.8
CEBR	July	2.1	2.3	5.7	82.4	4.83	-	-	-2.0
Experian Economics	Aug *	2.7	3.6	4.7	89.5	4.92	84.8	4.0	3.4
EIU	Oct	-	-	-	-	5.25	81.5	-	-
Heteronomics	Aug *	2.7	3.7	5.2	82.7	4.75	84.2	-	3.2
ICAEW	June	2.1	-	-	-	4.75	-	-	-
ITEM Club	Feb	2.0	1.4	2.8	81.7	4.25	-	-	-0.2
Liverpool Macro Research	June	2.0	3.0	3.6	81.5	4.00	-	-	-
NIESR	Aug *	2.8	4.4	4.6	-	5.08	-	-	-1.2
Oxford Economics	Aug *	2.5	3.8	5.3	83.4	4.75	82.8	3.8	3.8
OECD	May	2.8	-	3.1	-	4.75	84.6	-	-
IMF	Jan	-	-	-	-	-	-	-	-
Average of forecasts made in the last 3 months (excludes OBR forecasts)									
Independent		2.5	3.4	4.7	83.7	4.68	83.9	3.8	1.4
New (marked *)		2.5	3.6	4.8	84.7	4.75	83.6	3.9	2.2
City		2.5	3.7	5.0	82.8	4.64	83.3	3.8	2.0
Range of forecasts made in the last 3 months (excludes OBR forecasts)									
Highest		2.9	4.4	5.8	89.5	5.08	87.0	4.7	3.8
Lowest		2.0	2.3	3.0	81.5	4.00	80.0	3.0	-2.0
Median		2.4	3.5	4.8	82.8	4.75	84.1	3.7	2.0
OBR	Mar	1.4	2.1	3.4	-	4.15	77.0	2.3	-2.7

Source: Forecasts for the UK economy: a comparison of independent forecasts No 445 (HM Treasury, August 2024).

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

Table 2.3 Savills Property Price Forecasts

	2024	2025	2026	2027	2028	5 Year
Mainstream UK	2.5%	3.5%	4.5%	5.0%	4.5%	21.6%
South East	1.5%	3.0%	4.5%	4.5%	3.5%	18.2%
Prime Outer Commute	-1.5%	3.0%	4.5%	6.0%	5.5%	18.6%
Prime Wider South	-1.5%	3.5%	4.5%	6.5%	5.0%	19.1%
Mainstream UK Rents	6.0%	3.5%	3.0%	2.5%	2.0%	18.1%

Source: Savills Mainstream House Price Forecasts (November 2023) and Savills Prime Residential Property Forecasts²

2.12 In this context is relevant to note that the Nationwide Building Society reported in July 2024:

House price growth edged up in July

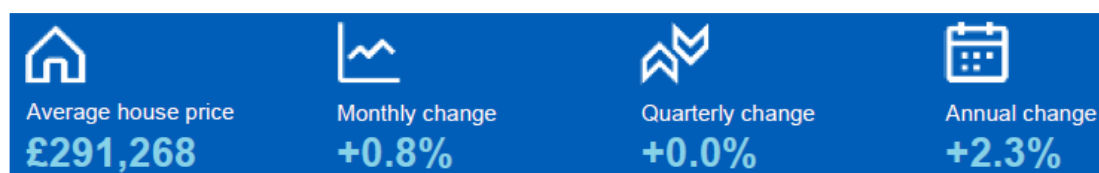
- UK house prices rose 0.3% month on month in July
- Annual growth rate picked up to 2.1%, from 1.5% in June
- Marks fastest pace of growth since December 2022

Headlines	Jul-24	Jun-24
Monthly Index*	526.6	524.9
Monthly Change*	0.3%	0.2%
Annual Change	21.1%	1.5%
Average Price (not seasonally adjusted)	£266,334	£266,064

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

2.13 The Nationwide produces regional figures on a quarterly basis. This data (June 2024) suggests, for the East Midlands an annual -0.2% change in Q2 2024 and an annual -0.5% change in the previous quarter.

2.14 Halifax Building Society reported a similar situation in August 2024:

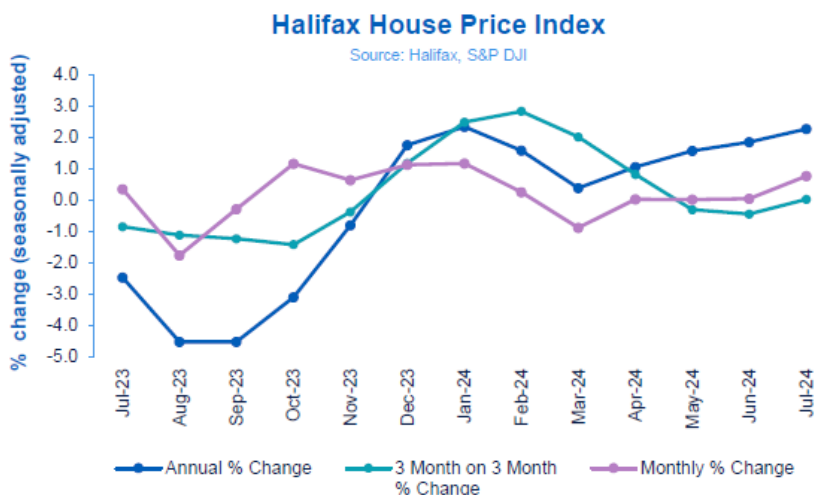


UK house prices rise in July

- House prices increased by +0.8% in July, following three relatively flat months
- Annual growth rate of +2.3% is the highest since January 2024
- Typical property now costs £291,268 (compared to £289,042 in June)

² [Savills UK | Revised Mainstream House Price Forecasts: 2024–2028](#), [Savills UK | Residential Property Market Forecasts](#)

- Northern Ireland continues to record the strongest annual house price growth in the UK



- 2.15 There is continued uncertainty in the market, and the substantial growth reported over the last few years seems unlikely to continue.

Changes in Development Costs

- 3.1 The build costs in the 2022 Viability Study, as suggested in the PPG, were derived from the BCIS data. The cost figure for Mid Sussex for ‘Estate Housing – Generally’ was £1,441 per sqm at that time (March 2022). The equivalent figure now (August 2024) has increased to £1,593 per sqm. This data shows that the cost of construction has increased by just over 10% since the 2022 LPVS was undertaken.
- 3.2 There has been much coverage in the press around build cost inflation. The BCIS is predicting that, going forward, that the General Build Cost Index will increase by about 2.7% over the next year (from August 2024 – 465.9 to August 2025 – 478.5) and by about 8.7% over the next three years. (from August 2024 – 465.9 to August 2027 – 506.5).

National Policy Requirements

- 4.1 In discussion with the Council, the following policy obligations were suggested in the 2022 Viability Study – although it was stressed that, the plan making process was ongoing, so this needed to be kept under review, and in any event, there was to be the normal political balance when prioritising and setting Local Plan policies.
- a. Affordable Housing 30% (66.7% Affordable Rent, 25% First Homes, 8.3% Shared Ownership).
 - b. Sustainability Zero Carbon. EV Charging points.
Water conservation – including rainwater harvesting.
10% Biodiversity Net Gain on typologies, 20% on Signifiant Sites.

- c. Design Part M4(2) / Part M4(3).
Significant Sites include 4 gypsy and traveller pitches³.

4.2 This was caveated as follows:

- 12.76 ... all the greenfield sites are able to bear 30% affordable housing and at least £30,000/unit in developer contributions. £30,000/unit in developer contributions is substantially higher than the Council's estimate of future developer contributions so there is a high likelihood that such development would be deliverable and the Council can be confident that it will be forthcoming. This comment applies to both the Significant Sites and the development represented by the typologies.
- 12.77 There is no doubt that the delivery of any large site is challenging. Regardless of these results, it is recommended that the Council continues to engage with the owners and promoters of the Significant Sites in line with the advice set out in the Harman Guidance and paragraph 10-006-20180724 of the PPG:
- 12.78 The Residual Values on the brownfield sites are less than greenfield sites. This is due to the additional costs (and contingencies) assumed to reflect the additional costs of bringing forward previously developed land. On the whole the Residual Value is less than the BLV on the brownfield sites. There are very few brownfield allocations proposed in the emerging Plan, however the Council should be cautious in relying on such sites to deliver housing development in short to medium term.
- 12.79 With the exception of brownfield sites, the Council can be confident that development will be forthcoming if it pursues the proposed policies and a zero carbon strategy.

- 4.3 The 2022 Viability Study included a review of national policy requirements, including anticipated changes. Changes in national policy are considered further.

Updated NPPF 2023

- 4.4 The 2022 Viability Study was carried out in line with the then current NPPF. Since then, the NPPF has been updated 3 times.

- 5 September 2023 – Changes around onshore wind development.
- 19 December 2023 – Changes around the implementation of housing targets.

- 4.5 20 December 2023 – Minor corrections to the 19 December 2023 NPPF.

- 4.6 The changes made do not impact on viability assessments.

Draft NPPF, July 2024

- 4.7 Following the July 2024 General Election, the new administration published a draft update to the NPPF. The changes are subject to period of consultation that runs to 24th September 2024. The Government will then consider the comments made before publishing a final version. The programme for this is uncertain, however it is anticipated that a new NPPF will be published before the end of 2024. The changes proposed, if carried into the final version,

³ In the 2022 Viability Study an allowance was made in the appraisals for 4 Gypsy and Traveller Pitches on each of the potential Significant Sites (4 x £35,000 = £140,000). This is an overstatement of the costs as 4 pitches are required over the 3 Significant Sites, rather than 4 pitches on each.

would have some very significant impacts on the plan-making process, with the main changes being around the Standard Method for deriving the need for housing and in relation to housing targets. The impact on viability would be relatively limited.

- 4.8 The Draft NPPF includes a new Annex that concerns viability in relation to land released from the Green Belt:

Annex 4: Viability in relation to Green Belt release

- 1) *To determine land value for a viability assessment, a benchmark land value should be established on the basis of the existing use value (EUV) of the land, plus a reasonable and proportionate premium for the landowner. For the purposes of plan-making and decision-taking, it is considered that a benchmark land value of [xxxx] allows an appropriate premium for landowners. Local planning authorities should set benchmark land values informed by this, and by local material considerations.*
- 2) *When determining planning applications, if land released from Green Belt is transacted above the benchmark land value and cannot deliver policy-compliant development, then planning permission should not be granted, subject to other material considerations.*
- 3) *Where policy compliant development can be delivered, viability assessment should not be undertaken, irrespective of the price at which land is transacted, and higher levels of affordable housing should not be sought on the grounds of viability.*
- 4) *Where land is transacted below the benchmark land value but still cannot deliver policy-compliant development, it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. Where a viability negotiation to reduce policy delivery has been undertaken, a late-stage review should be conducted to assess whether further contributions are required.*

- 4.9 The supporting text says:

Golden rules to ensure public benefit

23. The Government has committed to introducing 'golden rules' to ensure that major development on land released from the Green Belt benefits both communities and nature. This will build on our wider commitment for exemplary design, so that the following are required where land is released through plans or individual planning decisions:

- a. in the case of schemes involving the provision of housing, at least 50% affordable housing, with an appropriate proportion being Social Rent, subject to viability;*
- b. necessary improvements to local or national infrastructure, including delivery of new schools, GP surgeries, transport links, care homes and nursery places, to deliver well-designed, connected places, recognising that local leaders are best placed to identify the infrastructure that their communities need; and*
- c. the provision of new, or improvements to existing, local green spaces that are accessible to the public – where residential development is involved, new residents should be able to access good quality green spaces within a short walk of their homes, whether through onsite provision or through access to offsite facilities.*

- 4.10 Mid Sussex only includes a very small area of Green Belt, which is predominantly contained within the built up area of Copthorne village, so this would not apply to the majority of the District, nor will it apply to any of the proposed allocations, however, in relation to releasing land from the Green Belt, the consultation says:

*30. Benchmark land values are generally set as a multiple of agricultural use values, which are typically in the region of £20,000 - £25,000 per hectare, and as a percentage uplift on non-agricultural brownfield use values. We also note that views of appropriate premia above existing use values vary: for agricultural land, a recent academic paper suggested BLVs of three times existing use value; the Letwin Review of Build Out suggested ten times existing use value; Lichfields found that local planning authorities set BLVs of between 10- and 40-times existing use value. These BLVs do not necessarily relate to Green Belt land, which is subject to severe restrictions on development, and **Government is particularly interested in the impact of setting BLV at the lower end of this spectrum.***

- 4.11 If a Benchmark Land Value (BLV) of 10 times Existing Use Value (EUV) was to be implemented through national policy, it may suggest that the BLV assumption used in the 2022 Viability Study of EUV (£25,000 for agricultural uses) plus £500,000 per ha was overstated⁴.
- 4.12 The 2022 Viability Study was prepared strictly in accordance with the July 2021 NPPF but is also consistent with the changes proposed in the July 2024 Draft NPPF and supporting documents.
- 4.13 There are several further changes, that if implemented and applied to the Local Plan would have an impact on viability.
- 4.14 There is a new emphasis on Social Rent, as set out in paragraph 64 of the draft NPPF (and elsewhere). It is clear that some Social Rent is to be provided – but the extent of the need must be assessed.
- a. The dropping of the requirement for 10% of all homes to be Affordable Home Ownership as per paragraph 66 of the draft NPPF.
 - b. The dropping of the requirement for 25% of the affordable housing to be First Homes as per paragraph 5 of Chapter 6 of the consultation.
- 4.15 These will not apply to the new Mid Sussex Local Plan, so are not considered further.

Accessible and Adaptable Standards

- 4.16 In July 2022, the Government announced the outcome of the 2020 consultation on raising accessibility standards of new homes⁵ 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.

- 4.17 The new administration has not given an indication as to whether or not they will take this forward (there is no suggestion that they will not). To take it forward, the Government will

⁴ By way of wider context, a BLV of EUV x10 is proposed in the draft viability assessment, in relation to strategic sites, being prepared by neighbouring Lewes District Council and others.

⁵ [Raising accessibility standards for new homes: summary of consultation responses and government response - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes)

consult further on the technical changes to the Building Regulations to mandate the higher M4(2) accessibility standard. No timescale has been announced. In any event, in the 2022 Viability Study, M4(2) is assumed to apply on all units other than those built to the higher M4(3) standard.

Environmental Standards

- 4.18 In the spring of 2024, the previous Government carried out a consultation on how national standards in this regard may be implemented. The costs of higher standards were considered in the 2022 Viability Study. At the time of this note, no timescale has been announced, and the new administration have not given an indication as to whether or not they want to take this forward, but there is no suggestion that they will not as part of their wider ambitions in relation to zero carbon. The Local Plan requirements in this regard are considered below.

Levelling-up and Regeneration Act

- 4.19 At the end of October 2023, the *Levelling-up and Regeneration Act* become law. 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.
- 4.20 The *Levelling-up and Regeneration Act* includes reference to a new national Infrastructure Levy. The new Government has announced, as part of the July 2024 consultation on the Draft NPPF, that this will not be taken forward. This is not considered further.

Updated Policies in the Regulation 19 Submission Draft Plan

- 5.1 The policy testing in the 2022 Viability Study was carried out before the draft of policy wordings were finalised, and the findings of the 2022 Viability Study informed the development of policy.
- 5.2 There are two main areas that it is timely to review now, being in relation to developer contributions and the climate change policy. There several other policies that also have the potential to impact on viability that are reviewed. These are considered in turn below.

Climate Change

- 5.3 Within the 2022 Viability Study a range of steps towards zero carbon were tested, based on the then available data. In the final appraisals, based on the recommended policy mix, the BCIS based construction costs were increased by 10% to reflect the cost of the Council's preferred option of zero carbon development.
- 5.4 This is an area where national policy has developed since the 2022 Viability Study was prepared, and a topic on which further information has been published.
- 5.5 The Government carried out a consultation on how national standards in this regard may be implemented in the spring of 2024.

- 5.6 The Department of Levelling up, Communities and Housing introduced revisions to Conservation of Fuel and Power, Approved Document L of the Building Regulations (often referred to as the 2021 Part L standard) as a 'stepping stone' on the pathway to Zero Carbon homes that sets the target of an interim 31% reduction in CO₂ emissions over 2013 standards for dwellings that apply to new homes that submit plans after June 2022 or have not begun construction before June 2023.
- 5.7 The costs of meeting the current (i.e. 2021) Part L standard depends on the specific changes made and were considered in Chapter 3 of the 2019 Government Consultation⁶.
- 5.8 This suggests that the costs, having been indexed, would add a little less than 3%⁷ to the base cost of construction. These requirements have now been in place for a while, and whilst they are not fully reflected in the BCIS costs (the BCIS costs are based on past schemes) they are in part. It would now be appropriate to assume the additional costs of the recent increase in standards set out in 2021 Part L add 2% to the current BCIS costs.
- 5.9 The revisions to Part L of Building Regulations are a step towards the introduction of the Future Homes Standard in 2025. The Government published, in December 2023, a further consultation on the details of the implementation of the Future Homes Standard. At the same time then Housing Minister, made a Written Parliamentary Statement⁸ that 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:

- *That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.*
- *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 polices 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

- 5.10 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.
- 5.11 It also set out that where standards that are higher than national standards are introduced then they should be expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP). We

⁶ 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).

⁷ BCIS August 2024 466.6 BCIS Oct 2018 354.2 = 32%. £3,134+32%=£4,137. £4,137/90 sqm = £46/sqm. £46/sqm / BCIS Estate Housing £1,593 = 2.8%

⁸ [Written statements - Written questions, answers and statements - UK Parliament](#)

understand the Council have suggested Main Modifications to the Draft Plan for the Inspector to consider, to align the policy in this regard.

- 5.12 As set out above, within the 2022 Viability Study, the BCIS based construction costs were increased by 10% to reflect the cost of the Council's preferred option of zero carbon development. This allowance is now reviewed.
- 5.13 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
<i>Detached house</i>	£6,390	£-200**
<i>Semi-detached house</i>	£6,170	£950
<i>Mid-Terraced house</i>	£5,960	£740
<i>Low Rise Flats (<11m)</i>	£4,460	£2,760
<i>Mid Rise Flats (>11m) (same for both option)</i>	£190	£190
<i>Weighted Average (based on assumed build mix)</i>	£4,360	£640
<i>*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.</i>		

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.

- 5.14 Separately, the *Future Homes Hub, Ready for Zero, Evidence to inform the 2025 Future Homes Standard – Task Group Report* (February 2023) was published before the Government

consultation, so is testing a wider sets of options than are being considered at a national level. The following costs are estimated.

Table 5.1 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 CS2a 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)

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

5.16 The costs of the changing policy situation are summarised as follows.

Table 5.2 Overview of the two options currently in the Future Homes Standard consultation:

	Existing Part L 2021	FHS Option 1	FHS Option 2	Zero Carbon
Fabric	Baseline: Improved insulation & glazing than Part L 2013.	Further improvement from Part L 2021 (improvement to airtightness). No change to insulation or glazing.	No improvement from Part L 2021.	Significant improvements from Part L 2021. Mild improvement on FHS Option 1.
Heating	Gas boiler	Heat pump	Heat pump	Heat pump
PV	40% of ground floor area	40% of ground floor area. Greater efficiency than in Part L 2021.	None – removed.	To match 100% of energy demand – typically ~50-70% of ground floor area
Ventilation	Natural	Mechanical	Natural	Mechanical with heat recovery
Wastewater heat recovery?	Yes	Yes	No	No
Cost uplift from Part L 2021	N/A – baseline	4%	1%	4 – 7% depending on home type

Source: HDH (August 2024)

5.17 Future Home Standard Option 1 is sometimes referred to as zero carbon ready, being reliant on the de-carbonisation of the grid to achieve zero carbon and is most closely aligned with the council proposed modified policy DPS2. 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% CO₂ saving) to add 2% to the BCIS base costs.
- b. The Future Home Standard Option 2 is expected to add 3% (i.e. 2%+1%) to the current BCIS base costs.
- c. The Future Home Standard Option 1 is expected to add 6% (i.e. 2%+4%) to the current BCIS base costs.
- d. The cost of Zero Carbon (Regulated and Unregulated) would add 8% to the costs of construction.

5.18 The new Government has not announced in intentions with regard to the Future Homes Standard, rather at this stage it has concentrated in reforms to the NPPF concerning housing the quantum on development. If the government were to proceed with Option 1 the additional cost over the current BCIS cost would be about 6% and if it were to proceed with Option 2 the additional cost would be about 3% over the current BCIS cost.

- 5.19 The cost allowance of 10% added to the BCIS cost, used in the 2022 Viability Study would now be considered to be at the top of the range of costs for developing zero carbon standards.
- 5.20 As noted in the 2022 Viability Study (Paragraph 8.18) building to higher standards that result in lower running costs results in higher values^{9 10}, although no premium was assumed in the in this study 2022 Viability Study or this note and it is difficult to robustly quantify.

Water Usage

- 5.21 In the 2022 Viability Study an allowance was made for rainwater harvesting (Paragraph 8.25):

The policy goes on to mention rainwater harvesting and greywater recycling. There are few published costs, although figures of £2,000 to £3,000 are frequently quoted¹¹. The provision of rainwater harvesting requires the capture of rainfall. This is normally done through an underground tank. A second cold water system is then installed. As this is not at 'mains' pressure, this normally utilises a pump and pressure cylinder. This additional cost is incorporated into the base assumptions.

- 5.22 The policy has been clarified in this regard and now seeks 85 Litres Per Person Per Day (LPPPD). *Water Ready – A report to inform HM Government's roadmap for water efficient new homes* (Future Homes Hub, April 2024)¹², sets out some more recent costs in this regard:
- a. 110 LPPPD £7 per dwelling – being the Optional Building Regulations.
 - b. 100 LPPPD £350 per dwelling
 - c. 90 LPPPD £2,000 per dwelling (being the mid point of the range).
- 5.23 This more up to date information suggests that the assumption used in the 2022 Viability Study is appropriate and up to date.

Water Neutrality

- 5.24 A slither of the western area of the District lies within the Southern Water's Sussex North Water Resource Zone (WRZ). The Council is not proposing allocations in this area which sits within an area of countryside, remote from any settlement boundary, so this is not considered further.

Costs of Strategic Infrastructure and Mitigation

- 5.25 Through the Draft Plan there are policies that seek contributions towards Strategic Infrastructure and Mitigation. These were considered through the 2022 Viability Study, with

⁹ 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.)

¹⁰ [Savills UK | The cost and premium for new eco-homes](#)

¹¹ For example by the UK Rainwater Harvesting Association.

¹² [Water Ready A report to inform HM Government-s roadmap for water efficient new homes.pdf \(cdn-website.com\)](#)

an allowance of £12,000 per unit being made in the appraisals. There was a degree of uncertainty about this assumption, as the IDP was a work in progress so sensitivity testing, up to £30,000 per unit was undertaken.

- 5.26 In this regard, the Draft plan now includes policy requirements in respect of achieving ‘20 minute neighbourhoods’:
- 5.27 The Regulation 18 iteration of the Local Plan made reference to 20 minute neighbourhoods (from page 16), and the various principles were reflected through the individual policy in the draft Plan. Various policies now refer specifically to 20 minute neighbourhoods (DPS1, DPS6, DPB1, DPT1, DPT3, DPH7, DPDC GEN). The formalisation of the 20 minute neighbourhood principles are not new requirements. It is assumed the application of the 20 minute neighbourhood principles would be proportionate to the scale of the development and any costs associated with providing necessary infrastructure to meet the requirements is within the allowances made for s106 costs towards strategic infrastructure and mitigation, so it is not necessary to make an additional or separate allowance.
- 5.28 In August 2024 the Council updated the costs for strategic infrastructure and mitigation on the Significant Sites as follows:

Table 5.3 Significant Sites, Updated costs of Strategic Infrastructure and Mitigation. £ per unit

		Units	Cost per dwelling
DPSC1	West of Burgess Hill and north of Hurstpierpoint	1,350	£22,700
DPSC2	Land at Crabbet Park (total)	2,000	£19,900
DPSC3	Land to the South of Reeds Lane, Sayers Common	2,000	£22,100

Source: MSDC (September 2024) N.B. based on September 2024 IDP.

- 5.29 Whilst these are substantially above the allowance of £12,000 per units used in the 2022 Viability Study, they are within the £30,000 per unit range of sensitivity testing.

Summary and Conclusions

- 6.1 HDH Planning & Development Ltd produced the 2022 Viability Study. The study was commissioned to support the development of the new 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).
- 6.2 Since the 2022 Viability Study 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 the policies in the draft Local Plan and has provided the Inspector with suggested Main Modifications.

- 6.3 The value of newbuild housing, and the costs of construction have both increased since the 2022 Viability Study was undertaken. The Land Registry data suggests newbuild values have increased by about 28% and analysis of the new build sales suggests an increase of 17% or so (although there is a substantial lag in this data). New build asking prices have increased by about 16%. The BCIS suggests that build costs have increased by just over 10%. Values have increased more than costs, suggesting viability has improved since 2022.
- 6.4 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. All other things being equal the 2022 Viability Study remains up to date and is the appropriate document to support the next stage of the plan-making process.
- 6.5 There have been a number of changes to national policy and to the Draft Plan since the 2022 Viability Study was completed.
- 6.6 The 2022 Viability Study was carried out in line with the then current NPPF. Since then, the NPPF has been updated 3 times. The changes made do not impact on viability assessments. Following the July 2024 General Election, the new administration published a draft update to the NPPF. The changes are subject to period of consultation. These will not apply to the new Local Plan so are not considered further; in any event, it is understood that the Mid Sussex Local Plan will be Examined under the September 2023 version.
- 6.7 Changes to the Building Regulations in relation to Accessible and Adaptable Standards (Part M) have been announced, however no timescale has yet been announced. These changes were anticipated in the 2022 Viability Study, so the report is up to date in this regard.
- 6.8 The *Levelling-up and Regeneration Act* includes reference to a new national Infrastructure Levy, however, the new Government has announced, that this will not be taken forward. There is no impact on viability.
- 6.9 In the spring of 2024, the previous Government carried out a consultation on how national standards in relation to climate change and zero carbon development may be implemented. The costs of higher standards were considered in the 2022 Viability Study, taking into account the Council's preferred option to seek net zero development.
- 6.10 The new Government has not announced its intentions with regard to the Future Homes Standard. If the government were to proceed with Option 1, of the 2024 consultation, this would add about 6% to the BCIS cost. The costs allowance of BCIS plus 10% used in the 2022 Viability Study for the cost of zero carbon standards would now be considered to be at the top of the range of costs for developing zero carbon standards.
- 6.11 In the 2022 Viability Study an allowance was made for rainwater harvesting. The policy has been clarified in this regard and now seeks 85 LPPPD. The costs set out in *Water Ready – A report to inform HM Government's roadmap for water efficient new homes* (Future Homes Hub, April 2024), suggests that the assumption used in the 2022 Viability Study is appropriate and up to date.

- 6.12 A slither of the western area of the district lies within the Southern Water’s Sussex North Water Resource Zone (WRZ). The Council is not proposing allocations in this area.
- 6.13 Through the Draft Plan there are policies that seek contributions towards Strategic Infrastructure and Mitigation. These were considered in the 2022 Viability Study, with an allowance of £12,000 per unit being made in the appraisals. There was a degree of uncertainty about this assumption, as the IDP was a work in progress so sensitivity testing, up to £30,000 per unit was undertaken.
- 6.14 In September 2024 the Council updated the Infrastructure Delivery Plan and costs for strategic infrastructure and mitigation on the Significant Sites, suggesting the actual cost is likely to be in the £20,000 per unit to £25,000 per unit range. Whilst these are substantially above the allowance of £12,000 per units used in the 2022 Viability Study, they are within the £30,000 per unit range of sensitivity testing.
- 6.15 Sections 10.43 to 10.45 of the 2022 Viability Study considered the impact of changes in costs and values on the preferred set of policies, based on further appraisals that were summarised in Appendix 14 of the report. This analysis has been repeated based on the following changes.
- 6.16 The residential values have been increased by 20%. This is somewhat less than the information from the Land Registry.
- a. Build costs have been updated to the latest BCIS costs.
- 6.17 The costs of strategic infrastructure and mitigation has been increased to £25,000 per unit on the Significant Sites.
- 6.18 The results are presented below and are directly comparable to those presented in Appendix 14 of the 2022 Viability Study.

Table 6.1a Full Policy Requirements – Sensitivity Testing – North, including East Grinstead

			EUV	BLV/Residual Value													
				BCIS Value		+20%	+15%	+10%	+5%	+0%	-10%	-5%	0%	+5%	+10%	+15%	+20%
Site 1	Crabbet Park	Crawley	25,000	525,000	647,120	747,311	846,961	945,811	1,231,772	795,378	920,432	1,044,398	1,166,685	1,288,971	1,411,257	1,533,543	
Site 5	Green 350	North	25,000	525,000	1,053,150	1,202,644	1,352,138	1,501,632	1,925,846	1,270,468	1,461,150	1,651,126	1,839,192	2,027,258	2,215,325	2,403,391	
Site 6	Green 200	North	25,000	525,000	462,822	644,826	826,830	1,008,834	1,574,275	794,581	993,074	1,190,839	1,386,628	1,582,418	1,778,208	1,973,998	
Site 7	Green 100	North	25,000	525,000	509,476	705,464	901,452	1,097,439	1,692,070	864,426	1,079,286	1,293,427	1,505,621	1,717,815	1,930,009	2,142,203	
Site 8	Green 50	North	25,000	525,000	567,828	802,753	1,037,678	1,272,603	1,990,009	1,004,418	1,256,401	1,507,527	1,756,332	2,005,136	2,253,940	2,502,744	
Site 9	Green 30	North	25,000	525,000	845,650	1,066,635	1,287,620	1,508,604	2,175,763	1,226,399	1,478,855	1,729,589	1,975,659	2,221,728	2,467,798	2,713,868	
Site 10	Green 20	North	25,000	525,000	652,758	881,624	1,110,490	1,339,356	2,016,741	1,059,093	1,314,516	1,568,223	1,817,276	2,066,330	2,315,384	2,564,438	
Site 11	Green 12	North	50,000	550,000	450,472	698,932	946,067	1,193,202	2,373,316	907,821	1,174,079	1,440,338	1,706,596	1,972,854	2,239,112	2,505,370	
Site 12	Green 9	North	50,000	550,000	1,828,940	2,091,746	2,354,552	2,617,359	2,313,503	2,142,902	2,511,533	2,880,165	3,248,796	3,617,427	3,986,059	4,354,690	
Site 13	Green 9 DRA	North	50,000	550,000	960,105	1,212,367	1,464,629	1,716,891	2,460,056	1,408,996	1,689,075	1,969,153	2,249,232	2,529,311	2,809,389	3,089,468	
Site 14	Green 5	North	50,000	550,000	1,751,077	2,047,442	2,343,806	2,640,170	2,277,398	2,135,976	2,536,256	2,936,535	3,336,814	3,737,093	4,137,372	4,537,652	
Site 15	Flats 100	North	2,500,000	3,000,000	-2,103,668	-1,470,098	-836,527	-214,927	1,516,313	-699,651	-145,757	388,855	905,137	1,421,419	1,937,702	2,453,984	
Site 16	Flats 40	North	2,500,000	3,000,000	-1,307,955	-921,846	-535,737	-156,218	905,326	-452,281	-113,637	217,820	532,399	845,682	1,158,964	1,472,246	
Site 17	Flats 20	North	2,500,000	3,000,000	-1,207,849	-872,944	-538,040	-206,714	751,289	-454,060	-163,446	118,736	393,484	659,352	923,447	1,187,542	
Site 18	Flats 10	North	2,500,000	3,000,000	-1,075,092	-736,988	-398,884	-68,606	854,573	-339,363	-39,344	259,954	559,193	852,707	1,140,447	1,425,293	
Site 19	Flats 6	North	2,500,000	3,000,000	-274,203	-153,425	581,052	1,008,680	998,710	489,648	962,978	1,430,292	1,893,926	2,345,034	2,796,142	3,247,249	
Site 20	Brown 120	North	2,500,000	3,000,000	638,712	902,908	1,167,103	1,431,299	2,247,565	1,119,263	1,408,302	1,695,495	1,977,688	2,259,882	2,542,075	2,824,268	
Site 21	Brown 60	North	2,500,000	3,000,000	638,683	911,384	1,184,085	1,456,785	2,300,987	1,137,789	1,434,492	1,729,486	2,019,850	2,310,214	2,600,578	2,890,942	
Site 22	Brown 30	North	2,500,000	3,000,000	649,502	926,429	1,203,355	1,480,282	2,323,764	1,151,615	1,455,501	1,757,209	2,053,016	2,348,823	2,644,630	2,940,438	
Site 23	Brown 18	North	2,500,000	3,000,000	710,172	988,547	1,266,922	1,545,297	2,431,966	1,229,669	1,526,670	1,823,672	2,120,673	2,417,675	2,714,677	3,011,678	
Site 24	Brown 12	North	2,500,000	3,000,000	780,945	1,031,594	1,282,244	1,532,893	2,293,616	1,230,303	1,506,823	1,783,543	2,060,162	2,336,782	2,613,402	2,890,021	
Site 25	Brown 8	North	2,500,000	3,000,000	2,484,658	2,837,888	3,191,119	3,544,350	3,052,208	2,889,724	3,393,653	3,897,581	4,401,510	4,905,439	5,409,367	5,913,296	
Site 26	Brown 4	North	2,500,000	3,000,000	1,172,359	1,346,010	1,515,713	1,685,416	1,471,349	1,370,913	1,613,016	1,855,129	2,097,223	2,339,326	2,581,429	2,823,533	
Site 27	BTR 60	North	25,000	525,000	-446,512	-251,790	-61,204	125,463	805,584	-25,121	142,658	305,807	468,956	632,105	795,254	958,403	
Site 28	BTR 60 Flats	North	50,000	50,000	-1,356,783	-952,431	-548,078	-151,216	1,260,895	-434,093	-95,447	238,425	559,765	881,105	1,202,444	1,523,784	

Source: (HDH, August 2024)

in the 2022 Viability Study. On this basis the Council can continue to rely on the 2022 Viability Study to inform the plan-making process.

RS Drummond-Hay MRICS
HDH Planning & Development Ltd
24th September 2024