



An **APLEONA** company

Report

City Point
29 King Street
Leeds
LS1 2HL

T: +44 (0)8449 02 03 04
F: +44 (0)113 280 8080

Economic Viability Study (EVS) Update 2018

January 2018



Contents

1.	Executive Summary	2
2.	Introduction	4
3.	Methodology	6
4.	Site / Development Typologies	15
5.	Baseline Appraisals (Assumptions)	17
6.	Baseline Appraisal Results	36
7.	Proposed New Policies and Suggested Policy Changes	38
8.	Impact of Suggested Changes to Policy H5 - Affordable Housing	40
9.	Impact of new Policy H9 on Housing Space Standards	46
10.	Impact of new Policy H10 on Accessible Housing Standards	50
11.	Impact of suggested changes to Policy G4 (Greenspace in Residential Developments)	59
12.	Impact of new Policy EN8 on electric vehicle charging infrastructure	65
13.	Cumulative Impact of Core Strategy Selective Review	67
14.	CIL Review	80
15.	Conclusions and Recommendations	81

Prepared By: Dale Robinson, Director
Status: Final Report
Draft Date: January 2018

For and on behalf of GVA Grimley Limited

1. Executive Summary

1.1 GVA has been appointed by the Council to consider the impact on viability of proposed changes to policy introduced through a selective review of the Core Strategy, including:

- Policy H5 – review of affordable housing policy;
- Policy H9 – new policy on housing space standards;
- Policy H10 – new policy on housing access standards;
- Policy G4 – review of greenspace in residential development policy;
- Policies EN1 and EN2 – review of policies to reflect guidance within the Written Ministerial Statement of 2015; and
- Policy E8 – new policy on electric vehicle charging infrastructure.

1.2 Through this assessment it has been demonstrated that:

1. The policy for affordable housing should remain as currently set out under Policy H5 of the adopted Core Strategy for Zones 1 and 2. However, our analysis has suggested that affordable housing can be increased to 7% within the Inner Area (Zone 3) and City Centre (Zone 4).
2. A new policy (Policy H9) on minimum space standards will not undermine the viability of development across the City;
3. When setting a new policy (Policy H10) on housing access standards it would be prudent to base the requirement on 30% M4 (2) and 2% M4 (3). In addition the policy should seek adaptable rather than accessible dwellings.
4. The maximum amount of Greenspace being sought per dwelling, through Policy G4, should be capped at no more than 40sq.m per dwelling or could be differentiated per number of bed spaces as summarised below.
 - 1 bedroom dwelling – 23sq.m
 - 2 bedroom dwelling – 33sq.m
 - 3 bedroom dwelling – 44sq.m
 - 4 bedroom dwelling – 54sq.m
 - 5 or more bedroom dwelling – 66sq.m
 - Student bed spaces – 18sq.m
5. The changes to Policies to EN1 and EN2, as a result of the Written Ministerial Statement are less onerous to development than the previous policies so are unlikely to threaten the viability of development.
6. A new policy on Electric Vehicle charging infrastructure (Policy EN8) is viable.

- 1.3 Having considered the cumulative impact of the suggested policy changes in the Core Strategy Selective Review we believe there is no scope to increase the CIL charging rates over and above any increases permitted in accordance with CIL Regulation 40.

2. Introduction

- 2.1 The Economic Viability Study (EVS) January 2013 and EVS Position Update (May 2014) provide the latest viability evidence which support the adopted Core Strategy and the Community Infrastructure Levy Charging Schedule for Leeds.
- 2.2 However, since the publication of the previous assessments the market has continued to improve with some areas of the City witnessing house price inflation of more than 33% over and above the values included within the previous assessment. In addition the policy environment has changed following the Written Ministerial Statement of 2015 which has an impact on adopted Policies EN1 (Climate Change – Carbon Dioxide Reduction) and EN2 (Sustainable Design and Construction) of the Core Strategy.
- 2.3 The purpose of this report is to update the previous assessment(s) to reflect changes in market conditions (costs and values) but more importantly to consider the impact on viability of proposed changes to policy introduced through a selective review of the Core Strategy, including:
- Policy H5 – review of affordable housing policy;
 - Policy H9 – new policy on housing space standards;
 - Policy H10 – new policy on housing access standards;
 - Policy G4 – review of greenspace in residential development policy;
 - Policies EN1 and EN2 – review of policies to reflect guidance within the Written Ministerial Statement of 2015; and
 - Policy E8 – new policy on electric vehicle charging infrastructure.
- 2.4 GVA has been appointed by the Council to consider the viability of the suggested changes to policy and has acted in the capacity of an independent advisor when undertaking this assessment. Whilst most of the changes relate to residential development some of the suggested policy changes including EN1, EN2 and EN8 also impact on commercial development. However, the Government has indicated that the changes to Policies EN1 and EN2, brought about by the Written Ministerial Statement, can be ‘pass ported’ into the existing local policies and there will be no requirement to submit the revised policies for further examination. The costs associated with Policy EN8 are considered to be negligible with respect to commercial development. Within this context the changes to policy introduced through the selective review of the Core Strategy will be largely immaterial for commercial development and so the assessment has only focussed on what impact the proposed policy changes have on residential development.
- 2.5 This report has been prepared in accordance with the RICS Guidance Note – Financial Viability in Planning, 1st edition, published in August 2012 and the Local Housing Delivery Groups advice note for planning practitioners¹

¹ Viability Testing Local Plans June 2012.

- 2.6 The Royal Institution of Chartered Surveyors (RICS) recommends that suitably qualified professionals are consulted in undertaking viability assessments to inform the planning process. GVA is a company regulated by the RICS and this viability assessment has been undertaken by Dale Robinson, a qualified Chartered Planning and Development Surveyor and Registered Valuer.
- 2.7 At this stage it is important to recognise that viability appraisals undertaken to support the findings in this study do not constitute formal valuations and should not be regarded or relied upon as such. They provide a guide to viability in line with the purpose for which the assessment is required / being undertaken.

Report Structure

- 2.8 The remainder of this report is structured as follows:
- Section 3 summarises the overall approach / methodology that we have applied when undertaking this assessment;
 - Section 4 provides details on the sites / development typologies that have been considered within this assessment;
 - Section 5 sets out the assumptions that have been applied within the baseline appraisals;
 - Section 6 summarises the results from the baseline appraisals;
 - Section 7 summarised the suggested policy changes being considered as part of the selective review of the Core Strategy;
 - Section 8 sets out the impact of the proposed changes to Policy H5 (Affordable Housing);
 - Section 9 considers the impact of a new policy (Policy H9) on Minimum Space Standards;
 - Section 10 considers the impact of a new policy (Policy H10) on Accessible Housing Standards;
 - Section 11 sets out the impact of suggested changes to Policy G4 (Greenspace in Residential Development);
 - Section 12 considers the impact of a new policy (Policy EN8) on electric vehicle charging infrastructure
 - Section 13 considers the cumulative impact of the suggested policy approaches
 - Section 14 considers the potential for a CIL review; and
 - Section 15 provides our overall conclusions and recommendations.

3. Methodology

- 3.1 An individual development can be said to be viable if, after taking account of all costs the scheme provides a competitive return (profit) to the developer to ensure that development takes place and generates a land value sufficient to persuade the land owner to sell the land for the development proposed. If these conditions are not met, a scheme will not be delivered.
- 3.2 At a Development Plan level, viability is very closely linked to the concept of deliverability. In case of housing, for example a Development Plan can be said to be deliverable if sufficient sites are viable to deliver the plans housing requirements over the plan period.
- 3.3 The primary role of the EVS is to provide evidence to show that the requirements set out within the NPPF are met (i.e. that the policy requirements for development, set out within the Core Strategy, do not threaten the viability of the sites and scale of development upon which the Development Plan relies).
- 3.4 The most important function of the EVS is to bring together and consider the cumulative impact of the proposed changes to Core Strategy policies (Para 174 of the NPPF). However, it should be recognised that this assessment will not provide a precise answer as to the viability of every development likely to take place during the plan period. Instead it will simply provide high level assurance that the proposed changes to policies within the Core Strategy are set in a way that will not undermine the viability of the development needed to deliver the plan.

Methodology

- 3.5 For the purpose of this assessment we have used a residual model to test the viability of the proposed changes to policies in the Core Strategy. This replicates the methodology applied within our previous assessment. The model is also endorsed by the Local Housing Delivery Groups advice note for planning practitioners² and the RIC guidance note on Financial Viability in Planning when assessing the viability of development plan policies.
- 3.6 To reiterate, the residual appraisal model is a recognised valuation basis/approach and provides an indication of Market Value having regard to a pre-described range of circumstances / costs and values. The model assumes that the land value is the difference between Gross Development Value (GDV) and the Development Costs, once an element of developer profit has been taken into account. This can be expressed through the following calculation:

² Viability Testing Local Plans – June 2012

Gross Development Value (minus) Total Costs (minus) Developers Profit = Residual Land Value

- Gross Development Value (GDV) includes all sales income generated by the development.
- Total Development Costs include construction costs, professional fees, planning, finance / interest charges etc.
- Developers profit is expressed by reference to a percentage of the Total Development Costs or Gross Development Value. It can also be expressed by reference to an Internal Rate of Return (IRR)³.

- 3.7 In simple terms; only when the development value exceeds the total project costs and required returns (profit) can a scheme be considered viable. A scheme will not proceed where development costs exceed revenue (i.e. where there is a negative land value). However, even in circumstances where a very modest land value is generated it is not likely to be construed as viable, as it is unlikely to be sufficient to encourage a landowner to willingly release land for development.
- 3.8 In terms of the process, land value is a key component of a development appraisal, albeit (as explained previously) it can often be the 'outcome' of the appraisal rather than being a fixed figure (hence why appraisals are often referred to as being 'residual', because once all the inputs are included the 'residue' (if there is any) is the amount that the developer can afford to pay for the site.
- 3.9 However, the 'residue' from the appraisal (as a land value) does not always meet the expectations of the landowner (some landowners will anticipate life changing sums). If a developer is only able to pay a significantly reduced sum below the land owners expectations then the outcome is fairly straight forward. The land will not be sold / released for development. Therefore, when undertaking a viability assessment a minimum land value (aka benchmark land value) needs to be identified.
- 3.10 This changes the emphasis of a development appraisal when used for testing viability because rather than the land value being freely subject to change, there becomes a minimum land value below which a landowner would not release land for development. If this minimum value is reached other inputs within the appraisal would need to change to ensure viability. As the majority of development costs are fixed the only flexibility is the developers profit or the Councils policy / planning obligations. However, Para 173 indicates that the Councils policy / obligations should be at a level which provides the developer (as well as landowner) with a competitive return. This implies it is the Councils policies and or obligations which should be subject to change if the minimum land value has not been met but the Councils policies have been achieved in full.

³ Internal Rate of Return (IRR) is the interest rate at which the net present value of all the cash flows (both positive and negative) from a project or investment equal zero. Internal rate of return is used to evaluate the attractiveness of a project or investment. If the IRR of a new project exceeds a company's required rate of return, that project is desirable. If the IRR falls below the required rate of return, the project is normally rejected.

- 3.11 However, identifying a reasonable minimum land value (benchmark land value) is itself not straight forward.
- 3.12 There is no specific policy on what constitutes a reasonable 'minimum land value' but para 015 of Planning Practice Guidance (PPG) states that 'a competitive return for the land owner is the price at which a reasonable land owner would be willing to sell their land for the development'. The price will need to provide an incentive for the land owner to sell in comparison with the other options available. Those options may include the current use value of the land or its value for a realistic alternative use that complies with planning policy.
- 3.13 In addition to the guidance set out in PPG there is contradictory advice/ guidance issued by the Housing Delivery Group (aka the Harman Report) and RICS. The guidance within both documents is considered in further detail below.

Viability Testing Local Plans – June 2012 by the Housing Delivery Group (aka the 'Harman Report')

- 3.14 The Harman Report favours a minimum land value that is based on a premium over and above the sites Existing / Current Use Value (CUV). In the case of large green field sites the document states on page 30 that "it is widely recognised that this approach (i.e. a percentage increase over EUV) can be less straight forward for non-urban sites and urban extensions, where land owners are rarely forced or distressed sellers.....This is particularly the case in relation to large Greenfield sites...Accordingly, the uplift to the CUV sought by the landowners will invariably be significantly higher than in an urban context and requires careful consideration".
- 3.15 This does not mean that an assessment of the CUV has no part to play in the process of assessing Greenfield sites. A typical landowner will still want to know what the value of their site is without the planning permission and then judge by how much, if at all, the CUV increases when planning permission is granted. The difference is that for urban brownfield sites a premium uplift of circa 25% to 50% of the CUV may be deemed sufficient to incentivise a landowner to sell (e.g. if the CUV is £200,000 per acre, applying a 50% uplift would mean a minimum land value of £300,000 per acre, which would be attractive to the landowner). However, for Greenfield sites, if the CUV is only £10,000 per acre then a 50% uplift (i.e. a minimum land value of £15,000 per acre) would clearly not incentivise a landowner to release their land for development. This is especially so when some landowners have expectations of life changing sums.
- 3.16 In terms of how to evidence the approach to Greenfield sites the document goes on to state at page 30 that: "local sources should be used to provide a view on market values (the 'going rate'), as a means of giving a further sense check on the outcome of the CUV plus premium calculation. For sites of this nature (i.e. Greenfield) it will be necessary to make greater use of benchmarks, taking into account local partner views on market data and information on typical minimum price provisions used within developer / site promoter agreements for sites of this nature. Developers normally enter into option

agreements for large and strategic Greenfield sites which often stipulate a minimum land value. Typically these minimum values fall between £100,000 and £150,000 per acre.

- 3.17 The Harman report, therefore, seems to advocate using evidence of minimum land values based on CUV plus premium, as well as using market transactions as a general 'sense check'. However, care should be taken when using market transactions as a sense check. In particular there are a number of factors which impact the price someone is willing to pay for development land, because ultimately every development site is different. For example, you could have two sites next to each other sold at the same time, each being the same size. However, one may have significant level or flooding issues and poor access, whereas the other may have no concerns. The price paid for the land affected by the 'abnormal costs' (in this case levels, flooding and poor access) would therefore, in all probability, be much lower than the site without the abnormal costs. The reasons for the difference in value, however, would not be apparent by simply looking at the price paid for the land.
- 3.18 The valuation process to identify this reasonable price involves the practitioner making a judgement on what a reasonable value for the site would be having taken into account all the known costs (including those relating to applying the Councils policies / obligations and undertaking the abnormal costs). This is then viewed alongside the price at which a reasonable, hypothetical, commercially minded landowner would dispose of the land having regard to the sites CUV.
- 3.19 Some landowners will naturally want as high a price as they can achieve and some of them will not be prepared to recognise how the impact of planning gain and abnormal costs drive down land values.

Financial Viability in Planning (1st Edition GN 94/2012)) – August 2012 (RICS)

- 3.20 The Guidance issued by the RIC is grounded in the statutory and regulatory planning regime that currently operates in England and is consistent with the Localism Act 2011, the NPPF and Community Infrastructure Levy (CIL) Regulations 2010.
- 3.21 Whilst the RICS Guidance and that from the Local Housing Delivery Group (aka the Harman Report) can be seen as complimentary the RICS guidance provides more technical guidance on determining an appropriate minimum land value. In assessing the impact of planning policies / obligations on the viability of the development process, the Guidance emphasises the importance of using market evidence as the best indicator of the behaviour of willing buyers and willing sellers in the market, as envisaged by Para 173 of the NPPF.
- 3.22 The Guidance also acknowledges that, in the absence of any formal guidance, practitioners and local authorities have tended to adopt a variety of approaches, with respect to establishing minimum land values, but with most favouring the current use value (CUV) plus premium or a variant of this (i.e. Existing Use Value (EUV) plus premium).
- 3.23 The RICS Guidance does not favour the Current Use Value approach, stating it does not reflect the workings of the market (i.e. land does not sell for its CUV but rather at a price reflecting its potential for

development). It is accepted that the CUV plus premium approach does, in effect, recognise development potential by the application of a percentage increase over and above the CUV. However, this is considered to be a very unsatisfactory methodology, when compared to the market approach, as it assumes land would be released for a fixed percentage above CUV, which is generally described as arbitrary, inconsistently applied and not reflective of the workings of the market.

- 3.24 The Guidance also has regard to other definitions such as Existing Use Value (EUV) and Alternative Use Value (AUV) in order to clarify the distinction when assessing financial viability in a planning context. Existing Use Value (EUV) is defined by the RICS Red Book as: The estimated amount for which an asset or liability should exchange on the valuation date between a willing buyer and a willing seller in an arms-length transaction after properly marketing and where the parties had each acted knowledgeably, prudently and without compulsion assuming that the buyer is granted vacant possession of all parts of the property required by the business and disregarding potential alternative uses and any other characteristics of the property that would cause market value to differ from that needed to replace the remaining service potential at least cost.
- 3.25 In this context the Guidance concludes that it is inappropriate to consider EUV when considering financial viability in a planning context. In particular the Guidance concludes that it is an accounting definition of value for business use and, as such, hypothetical in a market context (property does not transact on a EUV basis).
- 3.26 The RICS Red Book is also quite clear in that where a purchaser in the market would acquire the property (site) for an alternative use (AUV) of the land because that alternative use can be readily identified as generating a higher value than the current use, and it is both commercially and legally feasible, the value for this alternative use would be the market value.
- 3.27 In this context the RICS guidance adopts the definition of 'market value' as the appropriate basis upon which to base the minimum land value. The guidance claims this is consistent with the NPPF, which acknowledges that 'willing sellers' of land should receive competitive returns'. The guidance is quite clear in that competitive returns can only be achieved in a market context (i.e. market value) and not one which is hypothetically based with an 'arbitrary mark-up' applied, as in the case of EUV (or CUV) plus premium.
- 3.28 In particular Para 2.3.2 Box 7 states "site value should equate to the market value⁴ subject to the following assumption: that the value has regard to the development plan policies and all other material planning considerations and disregards that which is contrary to the development plan".
- 3.29 This implies that the site value is assessed by means of a residual development appraisal. However, it suggests that planning policies are fixed and land value (because all of the other costs are fixed) is the

⁴ The definition of market value is the estimated amount for which a property should exchange on the date of valuation between a willing buyer and a willing seller in an arm's length transaction after proper marketing wherein the parties had each acted knowledgeably, prudently and without compulsion.

one item that is subject to change. This contradicts the view of the landowner needing a minimum land value below which they would not sell.

- 3.30 At Para 2.1.2 it follows.... *‘for example that the land value is flexible and not a fixed figure to the extent that the site value has to be determined as part of the assessment’*. This appears to support the view that it is the Councils policy which drives the land value, not the other way round.
- 3.31 In arriving at a site value the RICS guidance also recognises that any assessment of value will need to have regard to prospective (i.e. future) planning obligations, including emerging planning policies. In particular, the Guidance states that when undertaking Local Plan and or CIL (area wide) viability testing, a second assumption needs to be applied to the definition of market value. This is expanded further at section 3.3.5 of the Guidance which states. *Site Value (as defined above) may need to be further adjusted to reflect the emerging policy / CIL charging level. The level of the adjustment assumes that site delivery would not be prejudiced. Where an adjustment is made, the practitioner should set out their professional opinion underlying the assumptions adopted.*
- 3.32 The guidance does acknowledge that there must be a limit placed on the effect on market value, to reflect new policy or CIL, in terms of restricting any reduction in market value so that it does not go beyond what land would willingly transact at in order to provide a competitive return to a willing landowner.

The Planning Inspectorate’s view on determining minimum land values for viability assessments.

- 3.33 The Planning Inspectorate has recently considered the correct approach to determining benchmark / minimum land values for viability assessments, and indicated a change in direction. The market value approach was rejected in favour of the “Existing Use Value Plus” valuation method. The appeal [Ref APP/V5570/W/16/3151698] by Parkhurst Road Limited (“the appellant”) against the decision of Islington Borough Council (“the council”) to refuse planning permission for a residential development is the latest of a number of planning appeals to consider the correct approach to determining minimum land values when assessing the impact of planning obligations on the viability of a development.
- 3.34 The decision of the Inspector appears to demonstrate a change in direction from other recent decisions, and indicates that Market Value (MV) (representing the value of the property on the open market) or Alternative Use Value (AUV) (the value where there is a viable alternative use for the land) valuations will not, in most circumstances, be appropriate methods to determine the minimum land value benchmark. Instead, the Existing Use Value Plus (EUV Plus) valuation method is the approach to be adopted, which takes as its starting point the value of the property / site with its existing use plus an uplift to reflect the need to incentivise a sale.
- 3.35 The decision of the Inspector to apply the EUV Plus approach is significant in that it casts doubt on the appropriateness of using market value valuations and comparable evidence when determining the

minimum land value benchmark. However, the Inspector also explicitly acknowledged that there is a need to pay a premium to incentivise landowners to sell their land.

Minimum Benchmark Land Values

- 3.36 It is clear that a competitive return for the landowner is a price at which a 'reasonable' landowner would be willing to sell their land for development'. For the purpose of this assessment we have used the residual appraisal model to calculate the 'market value' of each site having regard to current local plan policies and any other material considerations. This establishes the 'true market values' reflecting the workings of the local property market. This is referred to as **Step 1** within our overall methodology.
- 3.37 As outlined previously it is accepted that the market values will need to be adjusted to reflect the emerging planning policies when undertaking area wide viability testing. However, it is also recognised that the adjustment should not be so excessive that it undermines competitive returns to a willing landowner (this point is recognised in the NPPF – Para 173). This is a judgement for the practitioner, which must be reasonable, having regard to the workings of the property market.
- 3.38 To understand the impact of future planning policy we have undertaken a second set of appraisals (this is referred to as **step two** within our methodology) which appraises what impact each emerging policy, through the Core Strategy Selective Review, has on the market values established within step one. The impact of each prospective planning policy is considered individually and cumulatively. For the purpose of this assessment we have assumed that any policy which reduces the market values (established within Step 1) by more than 30% is unviable. If the market values fall by between 25% and 30% the impact on viability as a result of the suggested policy change is considered marginal and if the market values fall by less than 25% the policy is considered viable.
- 3.39 However, it is accepted that within both stages of our methodology there will need to be a minimum benchmark land value, which if reached or exceeded will mean, in all probability, that land is not released for development (**step 3**).
- 3.40 We have assumed the following minimum land value benchmarks within step 3 of our assessment.

Greenfield Sites

- 3.41 The previous assessment included a single benchmark land value of £100,000 per acre. However, within this assessment we have included separate benchmark land values for small, medium, large and strategic sites.

Small Sites

- 3.42 For the purpose of this assessment we have assumed a minimum benchmark land value of between £240,000 and £250,000 per acre.

Medium and Large Sites

- 3.43 In terms of medium and large sites we have adopted a benchmark land value of between £180,000 and £187,500 per acre. It should be noted that the scale of some large sites means developers will normally enter into option agreements subject to a minimum land value of between £100,000 and £150,000 per acre. However, we have applied the higher benchmark (£187,500 per acre) to all large sites adding further tolerance within our assessment.

Strategic Sites

- 3.44 For strategic 'Greenfield' sites (and in some circumstance large sites, as explained earlier) developers normally enter into option agreements which often stipulate a minimum land value. Typically these minimum values fall between £100,000 and £150,000 per acre (gross). For the purpose of this assessment we have assumed a gross benchmark land value of £125,000 per acre for large and strategic Greenfield sites.

Brownfield Sites

- 3.45 In terms of the Brownfield sites it is difficult to establish what an appropriate minimum benchmark land value should be as the value will be influenced by the extent of the abnormal costs. For the purpose of this assessment we have made the following general assumptions.

- City Centre – a benchmark land value of £750,000 per acre.
- Other Areas – a benchmark land value of between £150,000 and £200,000 per acre

- 3.46 Figure 1 summarises our overall approach

Figur1 1 – Overall Approach / Methodology

Step 1

Gross Development
Value

Less

Costs

(inc) Profit

Equals

Site Value
(Market Value)

Step 2

Gross Development
Value

Less

Costs

Local Plan Policies /CIL

(inc) Profit

Equals

Site Value
(Market Value
or Benchmark)

Difference in Market Values (Step 1 minus Step 2)

Less than 25%	Viable
Reduction between 25% and 30%	Marginal
Reduction greater than 30%	Not Viable

This is the opinion of GVA and others may disagree. However, the examiner agreed the 25% figure in the Leeds CIL examination.

Step 3

Does the adjusted market value exceed the minimum benchmark land value?

Therefore, if the policy change reduces the market values (step 1) by 10% but the land value drops below the minimum land value benchmark (step 3) the policy change is not viable. Equally if the land value is higher than the benchmark land value (step 3) after the policy imposition but the reduction in the market values established in step 1 is 35% the suggested policy change is not viable.

4. Site / Development Typologies

- 4.1 Para 009 of the National Planning Policy Guidance (NPPG) advises that viability assessments should be proportionate but reflect the range of different development likely to come forward in an area and needed to deliver the vision of the plan.
- 4.2 The previous assessment tested viability using a range of hypothetical development schemes / typologies which reflected the types of sites likely to come forward for development over the plan period.
- 4.3 As the Site Allocations Plan (SAP) has now progressed the assessment is based on a small selection / sample of sites that represent the typical supply likely to come forward across the City. On this basis the assessment has assessed the viability of small (i.e. 15 dwellings or less), medium (16 to 50 dwellings) and large (>50 dwellings) scale development across the City linked to the affordable housing and CIL charging zones and the original Beacon settlements within each of these zones. The sample of sites also includes a number of strategic sites.
- 4.4 The site typologies are summarised in Table 1.

Table 1 – Site Typologies

	Site Size	Beacon Settlement	Zone	Gross Area (ha)	Average Density (gross)	no. Dwgs	Potential Type of Housing	GF	BF
1	Small	City Centre	Zone 4	0.05	280	14	Apartments	No	Yes
2	Medium	City Centre	Zone 4	0.14	280	39	Apartments	No	Yes
3	Large	City Centre	Zone 4	0.22	280	62	Apartments	No	Yes
4	Large	City Centre	Zone 4	0.99	280	277	Apartments	No	Yes
5	Small	Meanwood	Zone 3	0.50	35	18	Housing	Yes	Yes
6	Medium	Seacroft	Zone 3	1.30	35	46	Housing	Yes	Yes
7	Large	Halton Moor	Zone 3	2.80	35	98	Housing	Yes	Yes
8	Small	Allerton Bywater	Zone 2b	0.90	35	32	Housing	Yes	Yes
9	Medium	Allerton Bywater	Zone 2b	1.80	35	63	Housing	Yes	Yes
10	Large	Allerton Bywater	Zone 2b	2.92	35	102	Housing	Yes	Yes
11	Small	Pudsey	Zone 2b	0.39	35	14	Housing	Yes	Yes
12	Medium	Pudsey	Zone 2b	0.46	35	16	Housing	Yes	Yes
13	Large	Pudsey	Zone 2b	11.23	35	393	Housing	Yes	Yes
14	Medium	Micklefield	Zone 2b	1.57	35	55	Housing	Yes	Yes
15	Large	Micklefield	Zone 2b	4.30	35	151	Housing	Yes	Yes
16	Strategic	Garforth	Zone 2b	147.30	35	5156	Housing	Yes	Yes
17	Small	Moor Allerton	Zone 2b	0.28	35	10	Housing	Yes	Yes
18	Medium	Moor Allerton	Zone 2b	0.90	35	32	Housing	Yes	Yes
19	Small	Middleton	Zone 2a	0.36	35	13	Housing	Yes	Yes
20	Medium	Middleton	Zone 2a	0.72	35	25	Housing	Yes	Yes
21	Large	Middleton	Zone 2a	8.19	35	287	Housing	Yes	Yes
22	Small	Yeadon	Zone 1	0.43	35	15	Housing	Yes	Yes
23	Medium	Guiselley	Zone 1	1.98	35	69	Housing	Yes	Yes
24	Medium	Yeadon	Zone 1	0.47	35	16	Housing	Yes	Yes
25	Medium	Horsforth	Zone 1	0.83	35	29	Housing	Yes	Yes

	Site Size	Beacon Settlement	Zone	Gross Area (ha)	Average Density (gross)	no. Dwgs	Potential Type of Housing	GF	BF
26	Medium	Bramhope	Zone 1	1.49	35	52	Housing	Yes	Yes
27	Medium	Boston Spa	Zone 1	1.69	35	59	Housing	Yes	Yes
28	Large	Guiselley	Zone 1	5.06	35	177	Housing	Yes	Yes
29	Large	Yeadon	Zone 1	5.91	35	207	Housing	Yes	Yes
30	Large	Horsforth	Zone 1	5.35	35	187	Housing	Yes	Yes
31	Large	Bramhope	Zone 1	19.30	35	676	Housing	Yes	Yes
32	Large	Wetherby	Zone 1	2.39	35	84	Housing	Yes	Yes
33	Large	Scarcroft	Zone 1	5.80	35	203	Housing	Yes	Yes
34	Large	Moortown	Zone 1	13.43	35	470	Housing	Yes	Yes
35	Small	Horsforth	Zone 1	0.84	35	29	Housing	Yes	Yes
36	Small	Wetherby	Zone 1	0.53	35	19	Housing	Yes	Yes
37	Strategic	Horsforth	Zone 1	41.95	35	1468	Housing	Yes	No
38	Strategic	Wetherby	Zone 1	55.40	35	1939	Housing	Yes	No
39	Strategic	Aberford and Barwick	Zone 1	110.00	35	3850	Housing	Yes	No
40	Strategic	Tingley	Zone 2b	28.00	35	980	Housing	Yes	No

GF = Greenfield Typology

BF = Brownfield Typology

- 4.5 As highlighted in Table 1 the City Centre typologies are all assumed to be Brownfield reflecting the nature of the land supply (i.e. previously developed cleared sites). Within other areas of the City we have modelled the typologies assuming both Greenfield and Brownfield sites with the exception of the strategic sites which are all modelled exclusively on a Greenfield basis.

5. Baseline Appraisals (Assumptions)

- 5.1 Para 008 of the NPPG advises plan makers not to plan to the margins of viability but instead allow for a buffer which will accommodate changing markets and avoid the need for frequent plan updating. It advocates that current costs and values should be considered when assessing the viability of plan policy and expressly states that policies should be deliverable.
- 5.2 The assumptions used within our baseline appraisals, which establish the market value benchmarks against which to assess the impact of the suggested policy changes in the Core Strategy Selective Review are set out below. This forms Step 1 of our overall methodology⁵.
- 5.3 Where possible we have sought to apply the same assumptions used in the previous EVS. However, it has been necessary to update some of the previous assumptions to reflect changes in market circumstances. Any assumptions that have been altered from the previous assessment are clearly highlighted.
- 5.4 However, even at this stage, it must be recognised that whilst our assumptions will generally align with normal or usual figures expected in the majority of developments they may differ, in some cases, from the figures that may be used in actual development schemes.
- 5.5 It should also be recognised that until the suggested changes to policies within the selective review are adopted, planning decisions will continue to be based on the policies within the adopted Core Strategy (November 2014) and the NPPF.

Density

- 5.6 Policy H3 of the adopted Core Strategy states that housing development in Leeds should meet or exceed the net densities set out below unless there are overriding reasons concerning townscape, character, design or highway capacity.
- i. City centre and fringe⁶ - 65 dwellings per hectare
 - ii. Other urban areas – 40 dwellings per hectare
 - iii. Fringe urban areas – 35 dwellings per hectare
 - iv. Smaller settlements – 30 dwellings per hectare
- 5.7 For the purpose of this assessment we have applied a gross density of 280 dwellings per hectare within the City Centre, reflecting the fact that most schemes will be apartments and 35 dwellings per hectare in other areas of the City.

⁵ Refer to Section 2.

⁶ Defined as up to 500m from the boundary

Dwelling Types / Housing Mix

- 5.8 Policy H4 of the Core Strategy sets out the Council's position with respect to the mix of housing types. It states that developments should include an appropriate mix of dwelling types and sizes to address needs measured over the long term taking into account the nature of the development and character of location.
- 5.9 Further guidance is provided in the supporting text to Policy H4 where it is suggested that the mix set out in Table 2 should be aimed for. However, it is accepted that for small developments achievement of an appropriate mix to meet long term needs is not overriding. It is also accepted that the form of development and character of area should also be taken into account. For example a scheme of 100% flats may be appropriate in a particular urban context.

Table 2 - Policy H4 Preferred Housing Mix (2012 –2018)

Type	Max (%)	Min (%)	Target (%)
Houses	90%	50%	75%
Flats	50%	10%	25%
Size	Max (%)	Min (%)	Target (%)
1 bed	50%	0	10%
2 bed	80%	30%	50%
3 bed	70%	20%	30%
4 bed	50%	0%	10%

- 5.10 Within the parameters of Policy H4 the assessment is based on the development mix set out in Table 3. It is acknowledged that there may be many variations to this mix but we consider the mix (as specified below) to be appropriate for the purpose of this assessment.

Table 3 – Development Mix⁷

	Type	Studio Apartments - 1 person flat	1 bed apartment – 2 person flat	2 bed apartments – 4 person flat	3 bed apartments – 5 person flat	2 bed - 3 person house	3 bed – 5 – person house	4 bed – 6 person house	5 bed - 7 person house	Totals
Hous es	Small sites ⁹	-	-	-	-	35%	35%	25%	5%	100%
	Medium sites ¹⁰	-	-	-	-	35%	35%	25%	5%	100%

⁷ The requirements / preferred housing mix specified under Policy H5 supersede the assumptions on development mix included within the previous EVS (2013). Policy H5 also states that affordable housing should be provided on a pro – rata mix in terms of sizes and types of dwellings therefore no distinction has been made between the mix of private and affordable dwellings.

⁸ For the purposes of this assessment it is assumed that traditional housing schemes will not have to provide 1 bed house types as these are uncommon in the market. 1 bed dwellings are typically associated with apartments or flats over garages (FOG's).

⁹ Sites providing 15 or fewer dwellings

¹⁰ Sites providing between 16 and 50 dwellings

	Type	Studio Apartments - 1 person flat	1 bed apartment – 2 person flat	2 bed apartments – 4 person flat	3 bed apartments – 5 person flat	2 bed - 3 person house	3 bed – 5 – person house	4 bed – 6 person house	5 bed - 7 person house	Totals
	Large sites ¹¹	-	-	-	-	35%	35%	25%	5%	100%
Apts	Small sites	-	30%	50%	20%	-	-	-	-	100%
	Medium sites	10%	10%	50%	30%	-	-	-	-	100%
	Large sites	10%	10%	50%	30%	-	-	-	-	100%
Mixed	Small sites ¹²	-	-	-	-	-	-	-	-	-
	Medium sites	-	10%	25%	-	25%	35%	5%	-	100%
	Large sites	-	5%	10%	-	30%	35%	15%	5%	100%
	Strategic sites ¹³	-	2%	3%	-	30%	35%	25%	5%	100%

Dwelling Sizes

- 5.11 The unit sizes applied within this EVS are set out in Table 4. These have been updated from the previous assessment and are based on the average size of dwellings which have been sold over the past 12 months.

Table 4 – Average dwellings sizes

Property Type	No. Persons	Gross sq.m (net)	Gross sq.ft (net)
Studio flat	1 person	47sq.m (40sq.m)	507sq.ft (431sq.ft)
1 bed flat	2 person	53sq.m (45 sq.m)	570sq.ft (484sq.ft)
2 bed flat	3 person	71 sq.m (60sq.m)	760sq.ft (646sq.ft)
3 bed flat	5 person	106sq.m (90sq.m)	1,140sq.ft (969sq.ft)
2 bed house	3 person	70sq.m	753sq.ft
3 bed house	4 person	90sq.m	969sq.ft
4 bed house	7 person	125sq.m	1346sq.ft
5 bed house	8 person	165sq.m	1,776sq.ft

- 5.12 Whilst it is accepted that unit sizes will vary, especially when breaking down further to reflect semi-detached, detached and terraced properties, the assumptions are considered to be broadly representative of the average unit sizes in the majority of new build developments. We have also not made any distinction between the private and affordable dwellings.

¹¹ Sites providing more than 50 dwellings

¹² Its unlikely that a small site (i.e. less than 15 dwellings) will be mixed. In reality it will be developed out entirely for housing or apartments.

¹³ Sites providing in excess of 700 dwellings

Base Construction Costs

- 5.13 Our assessment of new build construction costs is based on cost data obtained from BCIS (Building Cost Information Service) rebased to the 4th quarter 2017 and adjusted to reflect local sensitivities in Leeds. For the purpose of this assessment we have applied the lower quartile rates for general estate housing and apartments. The costs reflect compliance with Part L 2010 Building Regulations (including M4 (1) Category 1 – visitable dwellings) and are inclusive of preliminaries but exclude external works.
- 5.14 Because the data from BCIS excludes costs associated with external works¹⁴ an additional allowance has been included for these items at 15% of the constructions rates / costs for housing and 10% for apartments¹⁵.
- 5.15 For clarity the base construction costs that have been included in this assessment are summarised in Table 5.

Table 5 – Base Construction Costs

Description	BCIS Lower Quartile Rates £psm (£psf) ¹⁶	External Works	Total Build Costs £psm (£psf)
Estate Housing	£926psm (£86psf)	15%	£1,065psm (£99psf)
Apartments	£1,075psm (£100psf)	10%	£1,183psm (£110psf)

Project / Professional Fees

- 5.16 Many viability studies incorporate an assessment of fees based upon a percentage of the base construction costs. Figures for fees relating to design, planning and other professional fees can range between 5% and 10%. Mirroring the assumptions used within the previous assessments project fees have been included at a rate of 6% outside of the City Centre and 10% within the City Centre. These are charged on construction costs (inclusive of external works).

CIL Charges

- 5.17 CIL was adopted by Full Council on 12th November 2014 and the charges became effective across Leeds from the 6th April 2015. The CIL Rates have been index linked in accordance with CIL Regulation 40

¹⁴ Whilst these works are likely to vary from site to site they would typically include all works associated with the exterior works of a project, ranging from ducts and drainage to general landscaping, parking, paving and perimeter boundaries etc.

¹⁵ These costs are a variation to the previous assessment which included 18% for external works on the housing and 15% for the apartments. The change of assumptions reflects representations from Savills (on behalf of a consortium of housebuilders) to the CIL Preliminary Draft Charging Schedule in which they confirmed that external costs alone equate to a minimum of 10% of build cost depending on the size of the development. As demonstrated in Table 5 our allowance is significantly higher for general estate housing.

¹⁶ It should be recognised that the DVS recently challenged the applicability of BCIS data to large housing developments, owing to rapid fluctuations and perceived weaknesses of the source data, particularly in relation to the small size of projects and the absence of input from major housebuilders. These concerns were upheld in a recent appeal decision (Ref: APP/N2739/S/16/3140425) in which the inspector agreed with the DVS's concern and accepted a build cost of £75.36psf which was significantly below the rates from BCIS. However, for the purpose of this assessment and recognising the requirements of Para 008 of the NPPG we have adopted the lower quartile rates from BCIS which provide an added tolerance / viability cushion over and above the general viability cushion. Because the cost of external works are based off a percentage of the build costs this also provides further tolerance over and above our general viability cushion.

using the BCIS All-In Tender Price Index value for the 1st November for the preceding year. The current CIL rates including indexation are set out in Table 6.

Table 6 – Residential CIL Charges

Zone	Current Charge (£psm)	Increase (£psm)
Zone 1	£97.99psm	£7.99
Zone 2a	£25.04psm	£2.04
Zone 2b	£49.00psm	£4.00
Zone 3	£5.44psm	£0.44p
Zone 4	£5.44psm	£0.44p

5.18 For the avoidance of doubt these CIL charges have been included within our baseline appraisals.

Remediation / Ground Conditions (Brownfield sites only)

5.19 In exercises such as this it is very difficult to make allowances for such costs, which are invariably subject to intrusive / detailed ground investigations etc. For the purpose of this assessment we have referred to guidance issued by the Homes and Communities Agency (HCA) on dereliction, demolition and remediation costs (March 2015).

5.20 Replicating our approach within the previous assessment it is assumed that most sites will fall under Category A, which comprise small scale and general industrial sites, colliery or mine spoil heaps, miscellaneous factories and works (not heavy industry) and sites with very small to small fuel tanks¹⁷. The assessment makes a second assumption that all of the Brownfield sites will fall within the low water risk category.

5.21 Based on these assumptions the remediation costs are:

- Flats / apartments with limited soft landscaping– between £50,000 and £130,000 per hectare; and
- Residential with private gardens – between £75,000 and £205,000 per ha.

5.22 The median costs have been adopted and a locational factor of 0.92 applied, as per the rates set out within the HCA guidance. On this basis the costs set out within Table 7 have been incorporated into our assessment:

¹⁷ Other categories include; Category B, which includes garages, workshops, pithead sites, railway lines, textiles, small scale timber treatment, sewage works, smaller chemical works, sites with small to mid-sized fuel tanks; Category C, which includes metal workings, scrap yards and shipyards, paints and solvents, small gasworks/gas holder sites, smaller power stations, rail depots (maintenance and refuelling) and site with large fuel tanks; and Category D, which includes major gasworks, iron and steel works, large chemical works, refineries and major fuel depots, ship breaking and building, larger power stations and sites with large tank farms.

Table 7 – Remediation Costs

Description	Median Cost £per ha	Location Factor	Cost £per ha included in assessment
Flats / Apartments	£90,000	0.92	£82,800
Residential with private gardens	£140,000	0.92	£128,800

- 5.23 Our assessment has assumed a worst case scenario and applied these costs to 100% of the brownfield land. However, the reality is likely to be very different and not all of the sites will be contaminated and some may only have contamination present in limited areas across the site.

Site Preparation

- 5.24 It is also assumed that the Brownfield sites will require an element of site preparation and demolition to facilitate their redevelopment. Assuming non-complex sites, the HCA guidance states that costs range between £5psm and £25psm of site area.
- 5.25 Assuming the median cost of £15psm and after adjusting for location factors the overall cost for site preparation is £14psm or £140,000 per ha. Once again our assessment has assumed a worst case scenario and applied these costs to 100% of the brownfield land

Contingencies

- 5.26 Contingencies are an allowance for unexpected development costs. The previous EVS applied a contingency of 5% but for the purpose of this assessment we have applied a lower contingency of 3% for the unconstrained / greenfield sites whilst maintaining a contingency of 5% for the constrained /Brownfield sites.

S106 Contributions

- 5.27 The CIL Regulations provides for the reform of the previous system of developer contributions towards infrastructure, principally through S106 Agreements, so that the two regimes can operate alongside one another. As at 1st April 2015, the Council became restricted in its use of S106 planning obligations. A planning obligation (under S106 of the Town and Country Planning Act 1990) cannot now be sought for infrastructure intended to be funded by the CIL and no more than five S106 obligations can be pooled by the Council to provide the same item of infrastructure. Any mechanism that attempted to fund significant strategic infrastructure through more than five obligations would need to be through CIL. This effectively eliminates the potential for the Council to use S106 planning style tariffs.

- 5.28 Whilst Section 106 will remain for site acceptability matters such as those which are needed to make the development work in physical terms, (i.e. access, flood protection and wildlife measures) the contributions must be 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.
- 5.29 However, it is difficult to deal with direct site acceptability matters in a study of this nature, as the assessment is based on hypothetical schemes. Mirroring the assumptions used in the previous assessment we have included allowances of £233 per dwelling for schemes of less than 50 dwellings and £625 per dwelling for schemes in excess of 50 dwellings¹⁸.

Strategic Infrastructure Costs

- 5.30 The previous EVS did not include additional infrastructure costs associated with strategic sites. Whilst it is accepted that some of these sites may require significant on site infrastructure these are often site specific and at the time the previous assessment was prepared the Council could not readily identify specific sites which may require significant on site infrastructure. To avoid any misplaced assumptions that might prejudice the assessment the previous EVS did not include allowances for these costs.
- 5.31 Whilst the Council has now progressed its Site Allocations Plan (SAP) which includes a number of strategic sites it is still in a position whereby all of the infrastructure requirements but more importantly the infrastructure costs associated with these strategic sites are not known. Therefore, we have not included any costs for the provision of strategic infrastructure. However, we have sought to take this into account by including a suitable viability cushion / buffer for the strategic sites (see later).

Costs associated with other Development Plan Policies

- 5.32 When calculating the base market values (step 1 of our methodology) upon which to base the impact of the suggested changes to the policies included within the selective review of the Core Strategy regard must be had to the existing policies set out within the adopted Core Strategy.
- 5.33 Relevant policies from the Core Strategy which have been considered when calculating the base Market Values include:
- Policy H5, which covers affordable housing
 - Policy T2, which deals with the accessibility requirements associated with new development
 - Policy G4 which sets out the requirements for new green space provision outside of the City Centre;
 - Policy G5 which sets out the requirements for new green space provision within the City Centre;
 - Policy EN1 which covers climate change and carbon dioxide reduction;

¹⁸ The site specific S106 contributions were calculated in the previous EVS by taking the average s106 contribution per dwelling and deducting those items that would be replaced by CIL.

- Policy EN2 which covers sustainable design and construction

Policy H5 – Affordable Housing

- 5.34 Policy H5 states that affordable housing will normally be expected at the targets specified in Table 8 for developments at or above the development thresholds for each zone.

Table 8 – CIL Zones and Charges

Zone	Target	Threshold ¹⁹
Zone 1	35%	10
Zone 2 ²⁰	15%	15
Zone 3	5%	15
Zone 4	5%	15

- 5.35 The policy also states that affordable housing should be designed to meet the identified needs of households, as follows:

- 40% affordable housing for households on lower quartile earnings (sub market housing); and
- 60% affordable housing for households on lower decile earnings (social housing)

- 5.36 This is a change from the previous assessment in which the affordable needs were based on the interim affordable housing targets²¹

Policy T2 – Accessibility Requirements and New Development

- 5.37 Policy T2 requires new development to be located in accessible locations that are adequately served by existing or programmed highways, by public transport and with safe and secure access for pedestrians, cyclists and people with impaired mobility.
- In locations where development is otherwise considered acceptable new infrastructure may be required on / off site to ensure that there is adequate provision for access from the highway network, by public transport and for cyclists, pedestrians and people with impaired mobility, which will not create or materially add to problems of safety, environment or efficiency on the highway network.
 - Developer contributions may be required for, or towards, improvements to the off site highway and the strategic road network, and to pedestrian, cycle and public transport provision. These will be

¹⁹ Policy H5 states that for housing schemes below the on site thresholds in Zones 1 and 2 and off site commuted sum will be sought tapered down proportionately from the equivalent cost of onsite provision at the lowest size threshold. However, in May 2016 the Court of Appeal handed down judgement on the Governments' appeal against the West Berkshire and Reading judicial review judgement of 31st July 2015. The appeal was allowed which reversed the original judgement thus effectively reinstating the Government's policies which were originally introduced in November 2014. This means the return of the 10 unit (or 1,000sq.m) threshold below which Local Authorities cannot require affordable housing (excepting certain rural areas where a 5 unit threshold may be applied). It also means the return of vacant building credit in relation to offsetting the floorspace of existing building against affordable housing contributions.

²⁰ This encapsulates CIL zones 2a and 2b)

²¹ The interim affordable housing targets required a split of 50% social rented and 50% sub market housing in Zone 1 and outer areas (Zone 2), 100% sub market within the Inner Area (Zone 3) and 40% social rent and 60% sub market within the City Centre (Zone 4).

- secured where appropriate through Section 106 Agreements and / or the Community Infrastructure Levy and by planning conditions.
- iii. Significant trip generating uses will need to provide Transport Assessments/Transport Statements in accordance with national guidance
 - iv. Travel Plans will be required to accompany planning applications in accordance with national thresholds and the Travel Plans SPD
 - v. Parking provision will be required for cars, motorcycles and cycles in accordance with current guidelines
- 5.38 Point ii is the most significant in terms of Policy T2. As outlined previously the use of S106 alongside CIL will still be permitted but the Regulations state that contributions sought by this mechanism must be a) necessary b) directly related and c) fairly and reasonable related in scale and kind to the development.
- 5.39 In this context S106 will continue to apply for direct site acceptability matters such as those which are needed to make the development work in physical terms. Offsite mitigation or provision of contributions may also be sought as S106 contributions so long as they satisfy the tests outlined above and are not items the Council has identified as being funded through CIL.
- 5.40 This EVS assumes that all strategic types of infrastructure are funded by CIL or alternative sources of funding which mirrors the approach applied in the previous assessment. However, it is more difficult to deal with direct site acceptability matters in a study of this nature as they are invariably dealt with on a site by site basis. As outlined previous the EVS has included an allowance of site specific S106 Contributions, which would include any costs associated with Policy T2.

Policy G4 – New Greenspace Provision

- 5.41 Policy G4 requires an on-site provision of greenspace of 80sq.m per residential unit for development sites of 10 or more dwellings that are outside of the City Centre and in excess of 720meters from a community park and for those which are located in areas of deficient greenspace. The policy further states that in areas of adequate supply, contributions of an equivalent value towards the safeguarding and improvement of existing Green space will take priority over the creation of new areas.
- 5.42 The previous assessment assumed that all sites fell within areas of adequate supply meaning priority would be given to the provision of an equivalent contribution towards safeguarding and improving an existing green space. It was assumed that this payment would effectively fall out of CIL.
- 5.43 Because the imposition of Policy G4 was not specifically tested in the previous assessment the Council is seeking to explore/ test a number of options (see later) through the Core Strategy Selective Review (CSSR)/. Within this context we have excluded the requirements of Policy G4 from the baseline appraisals. The impact of G4 is considered later at Section10.

Policy G5 – Open Space Provision in the City Centre

- 5.44 Policy G5 states that within the City Centre open space provision will be sought for sites over 0.5 hectares as follows:
- i. Commercial developments to provide a minimum of 20% of the total site area
 - ii. Residential development to provide a minimum of 0.41 hectares of open space per 1,000 population
 - iii. Mixed use development to provide the greater area of either 20% of the total site area; or a minimum of 0.41 hectares per 1,000 population of open space.
- 5.45 This policy is not part of the Core Strategy Selective Review so the requirements of Policy G5 have been included within the baseline appraisals. .

Policy EN1 – Climate Change – Carbon Dioxide Reduction

- 5.46 The first part of Policy EN1 requires all developments of 10 or more dwellings or over 1,000sq.m of floorspace to reduce total predicted carbon dioxide emissions to achieve 20% less than Building Regulations Target Emission Rate until 2016 when all development should be zero carbon. The second part of the policy requires a minimum of 10% of the predicted energy needs of the development from low carbon energy.
- 5.47 However, The Secretary of State for Communities and Local Government published a Ministerial Statement on 25th March 2015. This formed the culmination of the Housing Standards Review, which sought to rationalise the locally derived standards which are applied to new housing developments.
- 5.48 The Ministerial Statement sets out that Local Planning Authorities should no longer require a certain proportion of the Dwelling Emission Rate (DER) to be offset through Low or Zero Carbon (LZC) Energy. However the Statement does set out that Planning Authorities may continue to set and apply standards of energy efficiency above Building Regulations, equivalent to Code Level 4 standard. This approach can be maintained until the amendment of the Planning and Energy Act (2008)'. The Government has indicated that at this point in time they will bring the energy performance of Building Regulations up to the equivalent of Code Level 4.
- 5.49 The new system for technical standards also includes a higher 'optional' Building Regulations standard for water efficiency. Leeds can apply the higher optional standard because it has an existing plan policy which references the Code for Sustainable Homes.
- 5.50 The Government has indicated that the changes at national level can be 'pass ported' into the existing local policies and there will be no requirement to submit the revised policies for further examination.

- 5.51 Within this context the first part of Policy EN1 can now only be applied up to the equivalent of Code Level 4. DCLG recently published an impact assessment of the Housing Standards Review²² and within this document there is reference to the extra over costs associated with the energy aspects of the Code are set out within Table 9.

Table 9 – Extra over costs of the Energy aspects of the Code by level and house type.

Code Level	Flat	2 bedroom terrace	3 bedroom semi	4 bedroom semi
Code 1	£0	£0	£0	£0
Code 2	£0	£0	£0	£0
Code 3	£0	£0	£0	£0
Code 4	£954	£1,204	£1,639	£1,924
Code 5	£7,704	£10,954	£11,389	£11,674
Code 6	£11,639	£21,644	£22,514	£23,084

Source: Housing Standards Review – Impact Assessment (August 2013)

- 5.52 Within this context we have applied the costs outlined in red within our assessment. Note for the purpose of this assessment we have assumed the costs of a 2 bed terrace can be applied to our generic 2 bed property type and so forth. For our 5 bed house type we have applied a cost which is mirrors that for the 4 bedroom semi.
- 5.53 The second part of the policy is not affected by the Housing Standards and can still be applied. Once again we have referred to the impact assessment published by the DCLG to identify the extra over cost, per dwelling, of the on – site energy requirement. These extra costs are set out within Table 10.

Table 10 – extra over cost, per dwelling, of 10% on site energy requirement

2bed Apartment	2 bed house
2 bed apartments	£1,560
2 bed house	£1,400
3 bed house	£1,850
4 bed house	£2,400

Source: Housing Standards Review – Impact Assessment (August 2013)

- 5.54 For the purpose of our assessment we have applied an extra over cost of £1,560 for all the apartment typologies. In the absence of any specific data for 5 bed house types we have included the same cost as that for a 4 bed house type.

Policy EN2 – Sustainable Design and Construction

- 5.55 For the part of Policy EN2 that applies to residential development, the Council can only apply an energy efficient standard up to Code for Sustainable Homes Level 4 equivalent (as required by Policy EN1 (i))

²² Housing Standards Review Consultation – Impact Assessment (August 2013).

and a water efficiency standard up to the higher standard set by Government in the Housing Standards (i.e. 110 litres per person per day). The remaining code standards cannot be applied.

- 5.56 Achieving a water efficiency standard of 110 litres per person per day is the equivalent of Code Level 3, which can be achieved by installation of efficient water using fittings. Research undertaken by Waterwise estimated that achieving Code Level 3 water efficiency will add between £200 and £240 to the cost of a new home. For the purpose of our assessment we have included the median cost of £220 per property.

Sales Agents and Marketing

- 5.57 The assessment includes a combined allowance for sales agents and marketing at 3% of Gross Development Value. This replicates the assumptions used in the previous assessment.

Legal Fees

- 5.58 Legal fees are included at the rate of £450 per property, which aligns with the assumptions used in the previous assessment.

Finance Charges / Interest Rate

- 5.59 It is difficult to establish what the appropriate rate of interest would be in the current market. Current margins are substantial despite the current Bank of England base rate being 0.5%. It is also recognised that the approach to development varies widely and is influenced by the equity invested in the site along with the financial organisation / strength of the developer. The interest rates can therefore differ widely between these approaches.
- 5.60 We have included a finance rate of 6%. This is slight reduction on the rate used in the previous assessment but reflects advice from our valuation colleagues who prepare their valuations on the assumption of 6% finance.

Gross Profit Margin

- 5.61 Whilst there is no definitive answer as to what constitutes a reasonable profit Paragraph 173 of the NPPF provides specific guidance on the matter. It indicates that to ensure viability, developments should provide competitive returns to a willing developer to ensure they are appropriately incentivised to progress the development. In September 2016 the House Builders Federation (HBF) prepared a Briefing Note presenting evidence of what represents a competitive return to a willing developer. There is a clear conclusion in this report that the minimum blended profit level used within viability testing should be a rate of 20% of GDV, which would be inclusive of overhead recovery etc.

- 5.62 GVA also undertakes a significant number of bank funding valuations for developments to be undertaken by housebuilders and can confirm that a development which generates a profit of less than 20% of GDV is highly unlikely to be able to secure development funding. In the absence of bank funding, some housebuilders have sought funding through alternative sources, notably high net worth individuals and property investment companies. In our experience such individuals are also unwilling to support developments which generate a profit of less than 20% GDV.
- 5.63 We consider that a blended allowance for developers profit equating to 20% of GDV across all tenures is appropriate. This would be inclusive of overhead recovery so there is no need to include a separate allowance for overheads²³.

Stamp Duty and Purchasers Costs on Residual Land Value

Stamp Duty

- 5.64 The 2016 Budget introduced a change in calculation method for Stamp Duty Land Tax to a tranche/ratchet method. As of 1 April 2016, non-residential and mixed-use land Stamp Duty Land Tax (which includes residential land as this is classed as any other land or property which is not used as a residence) will be payable on portions of the price paid, as set out in Table 10.

Table 10 – Stamp Duty Thresholds

Banding	SDLT Rate
Up to £150,000	0%
£150,001 to £250,000	2%
Remaining amount over £250,000	5%

Purchasers Costs

- 5.65 An allowance of 1.5% of the gross residual land value has been included within the assessments.

Viability Tolerance

- 5.66 Whilst we have used a residual appraisal to derive the base market values (step 1 of our approach explained within Section 2) it is recognised that in exercises such as this it is not possible to capture all of the costs associated with bringing a development forward.
- 5.67 For this reason the assessment has included what is referred to as a viability tolerance / cushion on the Residual Land Value. No guidance as to what constitutes an appropriate cushion is provided. Instead this is left for the local planning authority to decide in collaboration with their partners and consultees.

²³ The previous assessment applied developers overheads at 6% (based off total build costs) and a net return (profit) equal to 15% of total costs.

For the purpose of this assessment we have applied a viability cushion of 10%²⁴ with the exception of the strategic sites where a viability cushion of 25% has been applied.

5.68 It should not be forgotten that this cushion is over and above the inherent viability cushions already included within the assessment such as:

- Base construction costs. Our costs are based on data from BCIS but DVS recently challenged the applicability of BCIS data to large housing developments, owing to rapid fluctuations and perceived weaknesses of the source data, particularly in relation to the small size of projects and the absence of input from major housebuilders. These concerns were upheld in a recent appeal decision (Ref: APP/N2739/S/16/3140425) in which the inspector agreed with the DVS's concern and accepted a build cost of £75.36psf which was significantly below the rates from BCIS. However, for the purpose of this assessment and recognising the requirements of Para 008 of the NPPG we have adopted the lower quartile rates from BCIS which provide an added tolerance / viability cushion over and above the general viability cushion. Because the cost of external works are based off a percentage of the build costs this also provides further tolerance over and above our general viability cushion.
- Remediation and site preparation (Brownfield sites only). Our assessment has assumed that all Brownfield sites will require remediation and site preparation and applied the respective costs to 100% of the Brownfield land. The reality is likely to be very different and not all of the brownfield sites will be contaminated and some may only have contamination present in limited areas / hot spots across the site.
- General contingency allowance of 3% on Greenfield sites and 5% on Brownfield sites.

Residential Sales Values

5.69 It is accepted that different sale values will apply in various locations across the City. This fact was recognised in the previous assessment which divided the City into four zones categorised as City Centre (Zone 4), Inner Area (Zone 3) Out Area South (Zones 2a and 2b) and Outer Area North (Zone 1). These zones were based on a series of sub market locations categorised by their main beacon settlements.

5.70 For the purpose of this assessment we have undertaken an analysis of sold house prices achieved over the past year (October 2016 – October 2017). It should be noted that our sample includes second hand / resale stock which lowers the average values as it generally acknowledged that new build homes sell at a premium to resale/second hand properties. Therefore the assessment has adopted a cautious approach. The corresponding sales values for each beacon settlement are summarised in Table 11.

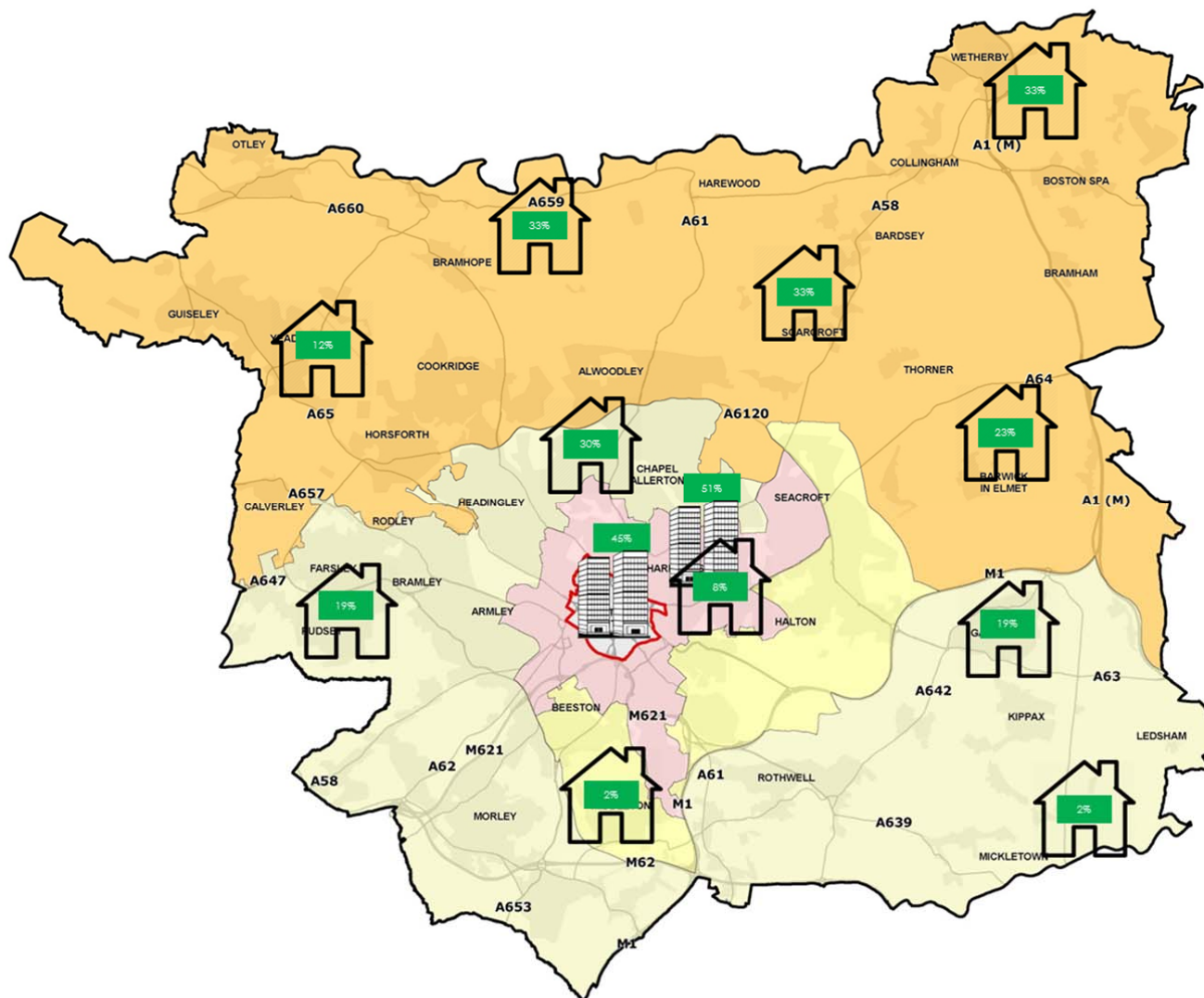
²⁴ The previous assessment(s) included a single viability tolerance of 10%

- 5.73 It should be recognised that sales values have improved considerably since the original EVS was undertaken with some areas of the City witnessing house price inflation of more than 33% over and above the values included within the previous assessment. Figure 2 shows how house prices have changed from those adopted in the previous assessment.

Table 11 – Market Values (Private / Market Values)

Beacon Settlement	Zone	Studio	1 bed	2 bed	3 bed	2 bed	3 bed	4 bed	5 bed
City Centre	Zone 4	£103,800	£116,775	£155,700	£233,550	-	-	-	-
Seacroft	Zone 3	£96,880	£108,990	£145,320	£217,980	£150,640	£193,680	£269,000	£355,080
Halton Moor	Zone 3	£96,880	£108,990	£145,320	£217,980	£150,640	£193,680	£269,000	£355,080
Middleton	Zone 2a	£58,120	£65,385	£87,180	£130,770	£140,000	£180,000	£250,000	£330,000
Allerton Bywater	Zone 2b	£75,320	£84,735	£112,980	£169,470	£140,000	£180,000	£250,000	£330,000
Pudsey	Zone 2b	£86,120	£96,885	£129,180	£193,770	£169,750	£218,250	£303,125	£400,125
Micklefield	Zone 2b	£77,800	£87,525	£116,700	£175,050	£140,000	£180,000	£250,000	£330,000
Garforth	Zone 2b	£77,520	£87,210	£116,280	£174,420	£165,760	£213,120	£296,000	£390,720
Moor Allerton	Zone 2b	£75,440	£84,870	£113,160	£169,740	£188,370	£242,190	£336,375	£444,015
Yeadon	Zone 1	£90,400	£101,700	£135,600	£203,400	£169,540	£217,980	£302,750	£399,630
Guiselley	Zone 1	£118,400	£133,200	£177,600	£266,400	£188,370	£242,190	£336,375	£444,015
Horsforth	Zone 1	£101,200	£113,850	£151,800	£227,700	£226,030	£290,610	£403,625	£532,785
Bramhope	Zone 1	£172,240	£193,770	£258,360	£387,540	£226,030	£290,610	£403,625	£532,785
Boston Spa	Zone 1	£109,000	£122,625	£163,500	£245,250	£210,980	£271,260	£376,750	£497,310
Wetherby	Zone 1	£129,160	£145,305	£193,740	£290,610	£226,030	£290,610	£403,625	£532,785
Scarcroft	Zone 1	£116,240	£130,770	£174,360	£261,540	£214,760	£276,120	£383,500	£506,220
Moortown	Zone 1	£77,520	£87,210	£116,280	£174,420	£184,660	£237,420	£329,750	£435,270
Aberford and Barwick	Zone 1	£118,400	£133,200	£177,600	£266,400	£214,760	£276,120	£383,500	£506,220
Meanwood	Zone 3	£96,880	£108,990	£145,320	£217,980	£169,470	£217,890	£302,625	£399,465
Tingley	Zone 2b	£77,480	£87,165	£116,220	£174,330	£150,640	£193,590	£269,000	£355,080

Figure 2



Affordable Housing Revenue

- 5.74 For the purpose of this assessment (mirroring the assumption in the previous EVS) it is assumed that the preferred delivery mechanism for the affordable housing would be to transfer the units to a nominated Registered Provider (RP). On this basis the revenue streams associated with the affordable housing have been derived from the Councils affordable housing benchmark prices and rents in Leeds (2017/2018)
- 5.75 Table 12 sets out the prices that the Council will normally expect developers to dispose of affordable dwellings to RP's. They are derived from the mortgage payments that low earning households in Leeds can afford to pay. They translate the affordability standards set out in Policy H5 of the Core Strategy (see earlier) into benchmarks that can be applied in practice achieving consistency between different developments. It is expected that RP's will pass on the affordability to occupiers subject to reasonable administration costs. For comparison purposes we have also shown how these values have changed since the previous 2013 assessment was undertaken.

Table12 – Affordable Sale Prices

Dwelling Type	Affordability	2017 / 2018 Benchmark Price £psm (psf)	2013 Benchmark Price £psm (psf)	Difference £psm (£psf)
House	Lower Decile	£645.04 (£60f)	£520 (£48)	+£125 (+£12)
	Lower Quartile	£828.10 (£77)	£984 (£91)	-£156 (-£14)
Apartment in Suburbs	Lower Decile	£701.86 (£65)	£520 (£48)	+£182 (+17)
	Lower Quartile	£904.37 (£84)	£1,230 (£114)	-£326 (-£30)
Apartment in City Centre	Lower Decile	£804.21 (£75)	£520 (£48)	+£284 +£26)
	Lower Quartile	£1,036 (£96)	£1,476 (£137)	-£440 (-£41)

- 5.76 To help put into context the actual cost of affordable housing we have undertaken a high level exercise based on a typical 2 bed flat and 3 bed house type. The results of this exercise, as set out in Table 13, demonstrate that the cost to the developer of providing a single 2 bed lower decile flat is £63,002 and for a single three bed lower decile house it is £66,429. The cost of providing a single lower quartile 2 bed flat is £51,863 and the cost of a single lower quartile three bed house is £53,249.

Table 13 – Indicative cost of Affordable Housing

Item	Lower Decile – 2 bed flat	Lower Decile – 3 bed house	Lower Quartile – 2 bed flat	Lower Quartile – 3 bed house
All inclusive build cost ²⁵	£111,254	£124,483	£114,039	£127,778
Value ²⁶	£48,253	£58,054	£62,176	£74,529

²⁵ Inclusive of design fees, contingency, finance and profit etc.

²⁶ Based on 2017 / 2018 benchmark prices

Item	Lower Decile – 2 bed flat	Lower Decile – 3 bed house	Lower Quartile – 2 bed flat	Lower Quartile – 3 bed house
Cost to developer	-£63,002	-£66,429	-£51,863	-£53,249

- 5.77 Table 14 sets out the affordable rent benchmarks. Management companies responsible for administering the rental dwellings would be expected to rent the affordable dwellings at rents that accord with the benchmarks subject to arrangements agreed with the Council.

Table 14 – Affordable Rents for PRS Schemes

Dwelling Type	Affordability	Benchmark £psm per week	Benchmark £psm per month
Apartments	Lower Decile	£1.23psm	£5.32psm
	Lower Quartile	£1.58psm	£6.85psm

6. Baseline Appraisals Results

- 6.1 Taking into consideration the assumptions set out in the previous section we have calculated the residual land values (market values) for each of the housing site typologies. The results of this exercise are set out within Tables 15 and 16.
- 6.2 At this stage it should be remembered that our base case market values include affordable housing in accordance with Policy H5 of the adopted Core Strategy, CIL (at the index increased rates) and extra over costs associated with Policies EN1 and EN2 of the adopted Core Strategy.

Table 15 – Greenfield Base Market Values²⁷

Site Size	Zones	Base Case Market Values (£ per acre)	Minimum Benchmark Land Value Achieved ²⁸
Small Sites	Zone 1	£364,724	Yes
	Zone 2a	£316,181	Yes
	Zone 2b	£557,217	Yes
	Zone 3	£617,228	Yes
	Zone 4	Not / Applicable	-
Medium Sites	Zone 1	£368,744	Yes
	Zone 2a	£136,862	No
	Zone 2b	£307,109	Yes
	Zone 3	£382,288	Yes
	Zone 4	Not / Applicable	-
Large Sites	Zone 1	£391,696	Yes
	Zone 2a	£139,843	No
	Zone 2b	£218,252	Yes
	Zone 3	£394,704	Yes
	Zone 4	Not Applicable	-
Strategic Sites	Zone 1	£431,863	Yes
	Zone 2b	£239,403	Yes

- With the exception of Zone 2a (medium and large sites) the values generated exceed the minimum land value benchmarks.
- Whilst development in Zone 2a generates positive land values the values for medium and large sites fall below the minimum benchmark land values and, therefore, are unlikely to provide an incentive for landowners to release land for development.
- Zone 4 is the City Centre, therefore it is extremely unlikely that any sites will be Greenfield.

²⁷ Step 1 of our methodology

²⁸ Refer to Section 2 for details on the minimum benchmark thresholds

Table 16 – Brownfield Base Market Values

Site Size	Zones	Base Case Market Values (£ per acre)	Minimum Benchmark Land Value Achieved ²⁹
Small Sites	Zone 1	£268,797	Yes
	Zone 2a	£193,531	Yes
	Zone 2b	£438,452	Yes
	Zone 3	£497,098	Yes
	Zone 4	£1,593,694	Yes
Medium Sites	Zone 1	£253,396	Yes
	Zone 2a	£11,423	No
	Zone 2b	£194,296	Yes
	Zone 3	£262,157	Yes
	Zone 4	£1,253,172	Yes
Large Sites	Zone 1	£273,423	Yes
	Zone 2a	£19,712	No
	Zone 2b	£103,887	No
	Zone 3	£274,573	Yes
	Zone 4	£877,777	Yes

- Medium and large brownfield sites in Zone 2a generate land values which are exceptionally low and are arguably unviable.
- Whilst large brownfield sites in Zone 2b generate a land value in excess of £100,000 per acre this is below the minimum benchmark land value.
- Brownfield development in other areas of the City is viable and generates land values which are in excess of the minimum land value benchmarks for Brownfield sites.
- At this stage it should be recognised that our assessment has assumed that all brownfield sites are contaminated and will require site preparation. We have also applied remediation and site preparation costs to 100% site coverage. The reality is likely to be very different and not all of the sites will be contaminated and some may only have contamination present in limited areas across the site. Our assessment of Brownfield sites is, therefore, based on a very cautious approach.
- In addition some sites may also be awarded vacant building credit, thereby, further improving viability.

²⁹ Refer to Section 2 for details on the minimum benchmark thresholds

7. Proposed Policy Approaches / Changes within the Core Strategy Selective Review

- 7.1 As outlined previously viability is an important theme in the National Planning Policy Framework (NPPF). Indeed, the Framework specifically states (Para 173) that plans should be deliverable. It goes on to state that the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, it states that the costs of any requirements likely to be applied to development should, when taking account of the normal costs of development and on-site mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 7.2 Paragraph 174 of the NPPF further states that local planning authorities should when setting out their policy on local standards assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk and should facilitate development throughout the economic cycle.
- 7.3 Para 005 of the Planning Policy Guidance (PPG) reinforces these points and recommends that development of plan policies be iterative – with draft policies tested against evidence of the likely ability of the market to deliver the plan's policies, and revised as part of a dynamic process. It further states that evidence should be proportionate to ensure that plans are underpinned by a broad understanding of viability but recognises that greater detail may be necessary in areas of known marginal viability or where the evidence suggests that viability might be an issue.
- 7.4 The primary role of a Local Plan viability assessment is to provide evidence to show that the requirements set out within the NPPF are met – i.e. that the policy requirements for development do not threaten the viability of the sites and the scale of development upon which the plan relies. Demonstrably failing to consider this issue will place the Local Plan at risk of not being found sound.

Core Strategy Selective Review – Suggested Policy Approaches

- 7.5 As outlined in the introduction the Council is undertaking a selective review of policies within its Core Strategy including:
- Policy H5 – review of affordable housing policy
 - Policy H9 – new policy on housing space standards
 - Policy H10 – new policy on housing access standards
 - Policy G4 – review of greenspace in residential development policy

- Policies EN1 and EN2 – review of policies to reflect guidance within the Written Ministerial Statement of 2015³⁰; and
- Policy E8 – new policy on electric vehicle charging infrastructure

Impact of Core Strategy Selective Review

- 7.6 The purpose of this viability assessment is to demonstrate / provide the technical evidence that the policies approaches being proposed are viable and will not undermine the viability of the planned development.
- 7.7 It is accepted that the baseline land values³¹ will need to be adjusted to reflect the proposed / suggested policy approaches within the Core Strategy Selective Review. However, it is also recognised that the adjustment should not be so excessive that it undermines competitive returns to a willing landowner (this point is recognised in the NPPF – para 173). This is a judgement for the practitioner, which must be reasonable, having regard to the workings of the property market.
- 7.8 As outlined previously, for the purpose of this assessment, we have assumed that any policy which reduces the market values (established within Step 1) by more than 30% is unviable. If the market values fall by between 25% and 30% the impact on viability as a result of the suggested policy change is considered marginal and if the market values fall by less than 25% the policy is considered viable. However, this is also subject to the provision that the land values do not fall below the minimum benchmark land values.
- 7.9 Therefore to recap, if the policy change reduces the market values (step 1) by 10% but the land value drops below the minimum land value benchmark (step 3) the policy change is not viable. Equally if the land value is higher than the benchmark land value (step 3) after the policy imposition but the reduction in the market values established in step 1 is 35% the suggested policy change is also not viable.
- 7.10 We have considered the impact of these suggested approaches/policy changes within the subsequent chapters. The assessment has considered the impact of each policy individually and cumulatively.

³⁰ As outlined in the previous section we have incorporated the updated requirements of Policies EN1 and EN2 within our base appraisals.

³¹ Calculated via Step 1 of our methodology

8. Proposed Changes to Policy H5 (Affordable Housing) and their impact on Viability

- 8.1 As part of the selective review of the Core Strategy the Council wish to understand the viability of the following options.

Table 17 – Suggested Policy Options for Affordable Housing

Zone	Option 1	Option 2	Option 3	Option 4
Zone 1	35%	40%	40%	40%
Zone 2	15%	20%	20%	20%
Zone 3	5%	10%	15%	15%
Zone 4	5%	10%	15%	15%

- 8.2 Options 1 and 2 assume there will be no national policy expectation for the provision of Starter Homes. Option 1 maintains the original Core Strategy targets, whilst Option 2 adds 5%. Both options assume that the mix of affordable housing should reflect local need with 40% of the affordable housing being for households on lower quartile earnings³² with the remaining 60% being for households on lower decile³³ earnings.
- 8.3 Option 3 and 4 propose that in Zones 1 and 2 half of the affordable homes should be home ownership dwellings with the remaining 50% being for households on lower decile earnings. Within Zones 3 and 4 Options 3 and 4 propose that two thirds of the affordable homes should be home ownership dwellings with the remaining dwelling being for households on lower decile earnings.
- 8.4 Options 3 and 4 also assume there will be provision of Starter Homes. Option 3 expects 50% of home ownership dwellings to be starter homes and Option 4 expects 100% of home ownership dwellings to be starter homes.
- 8.5 For the purpose of this assessment (mirroring the assumption in the baseline appraisals) the revenue streams associated with the affordable housing (except Starter Homes) have been derived from the Councils affordable housing benchmark prices and rents in Leeds (2017/2018). For Starter Homes it is assumed that the values will be based on 80% of market value.

Impact of Proposed Changes to Policy H5 - Affordable Housing

- 8.6 The impact of the suggested changes to Policy H5 are highlighted in Tables 18 and 19.

³² This includes affordable tenures such as shared ownership and discount sale or sub market rental.

³³ This tenure includes social rented housing and affordable rented housing

Greenfield Results

Table 18 - Impact of Changes to Policy H5 (Affordable Housing)

Site Typology	Zone	Base Case ³⁴	Base Case (Plus H5 – Option 2)	% Change	Base Case (Plus H5 – Option 3)	% Change	Base Case (Plus H5 – Option 4)	% Change
Small Sites	Zone 1	£364,724	£289,616	-21%	£418,405	15%	£577,125	58%
	Zone 2a	£316,181	£50,124	-84%	£50,124	-84%	£108,891	-66%
	Zone 2b	£557,217	£428,753	-23%	£438,407	-21%	£478,398	-14%
	Zone 3	£617,228	£530,048	-14%	£519,609	-16%	£577,299	-6%
Medium Sites	Zone 1	£368,744	£287,387	-22%	£426,440	16%	£569,253	54%
	Zone 2a	£136,862	£50,124	-63%	£86,406	-37%	£143,773	5%
	Zone 2b	£307,109	£235,188	-23%	£280,578	-9%	£333,409	9%
	Zone 3	£382,288	£329,241	-14%	£315,621	-17%	£351,384	-8%
Large Sites	Zone 1	£391,696	£303,235	-23%	£444,542	13%	£585,988	50%
	Zone 2a	£139,843	£83,985	-40%	£121,803	-13%	£158,584	13%
	Zone 2b	£218,252	£158,873	-27%	£200,874	-8%	£241,964	11%
	Zone 3	£394,704	£332,281	-16%	£318,173	-19%	£359,684	-9%
Strategic Sites	Zone 1	£431,863	£348,975	-19%	£482,806	12%	£611,091	42%
	Zone 2b	£239,403	£187,465	-22%	£226,789	-5%	£263,310	10%

% Land value reduced by less than 25% = **Acceptable**
 % Land value reduced by between 25% and 30% = **Marginal**
 % Land value reduced by more than 30% = **Unacceptable**

£ Significantly exceeds Benchmark Land Value = **Acceptable**
 £ Slightly above or below the Benchmark Land Value = **Marginal**
 £ Significantly below the Benchmark Land Value = **Unacceptable**

³⁴ Includes Policy H5 (Option 1), Updated Policies EN1 and EN2 and Index increased CIL

Brownfield Results

Table 19 - Impact of Changes to Policy H5 (Affordable Housing)

Site Typology	Zone	Base Case ³⁵	Base Case (Plus H5 – Option 2)	% Change	Base Case (Plus H5 – Option 3)	% Change	Base Case (Plus H5 – Option 4)	% Change
Small Sites	Zone 1	£268,797	£209,529	-22%	£328,101	22%	£455,076	69%
	Zone 2a	£193,531	£0	-100%	£0	-100%	£0	-100%
	Zone 2b	£438,452	£333,950	-24%	£333,950	-24%	£358,963	-18%
	Zone 3	£497,098	£409,918	-18%	£399,478	-20%	£457,168	-8%
	Zone 4	£1,593,694	£413,327	-74%	£349,886	-78%	£716,922	-55%
Medium Sites	Zone 1	£253,396	£190,201	-25%	£314,178	24%	£448,174	77%
	Zone 2a	£11,423	£0	-100%	£0	-100%	£18,689	64%
	Zone 2b	£194,296	£143,911	-26%	£173,393	-11%	£212,212	9%
	Zone 3	£262,157	£209,110	-20%	£195,490	-25%	£231,254	-12%
	Zone 4	£1,253,172	£853,584	-32%	£778,196	-38%	£1,043,242	-17%
Large Sites	Zone 1	£273,423	£194,295	-29%	£324,411	19%	£465,857	70%
	Zone 2a	£19,712	£0	-100%	£1,215	-94%	£38,454	95%
	Zone 2b	£103,887	£79,947	-23%	£97,393	-6%	£121,364	17%
	Zone 3	£274,573	£212,150	-23%	£198,043	-28%	£239,554	-13%
	Zone 4	£877,777	£567,253	-35%	£501,062	-43%	£702,524	-20%

% Land value reduced by less than 25% = **Acceptable**
 % Land value reduced by between 25% and 30% = **Marginal**
 % Land value reduced by more than 30% = **Unacceptable**

£ Significantly exceeds Benchmark Land Value = **Acceptable**
 £ Slightly above or below the Benchmark land Value = **Marginal**
 £ Significantly below Benchmark Land Value = **Unacceptable**

³⁵ Includes Policy H5 (Option 1), Updated Policies EN1 and EN2 and Index increased CIL

8.7 The results of our assessment demonstrate the following:

Policy H5 – Option 2.

Zone	Requirement	
Zone 1	40%	Option 2 assumes there will be no national policy expectation for the provision of Starter Homes and adds 5% to current policy requirements. The threshold is also lowered to 10 dwellings. Both options assume that the mix of affordable housing should reflect local need with 40% of the affordable housing being for households on lower quartile earnings ³⁶ with the remaining 60% being for households on lower decile ³⁷ earnings.
Zone 2	20%	
Zone 3	10%	
Zone 4	10%	

- Option 2 lowers the value of small Greenfield sites by 21% in Zone 1 and 23% in Zone 2b. Values for small Greenfield sites in Zone 3 fall by around 14%. These reductions are all within acceptable limits. However, the value of small Greenfield sites within Zone 2a falls by 84%, which is unacceptable. All of the land values for small Greenfield sites, with the exception of those within Zone 2a, exceed the minimum benchmark thresholds after applying Policy H5 (Option 2). In terms of the Brownfield sites the land values, after the application of Policy H5 (Option 2), exceed the minimum benchmark thresholds except in Zone 2a where development on brownfield land would become unviable. And Zone 4 (City Centre)³⁸ which sees land values reduce by 74%, which is unacceptable.
- The impact of Policy H5 (Option 2) on medium Greenfield sites is very similar to that evidenced on the small sites. However, for medium sized Brownfield sites the impact is a little more pronounced. Whilst the land values generated in Zone 1 exceed the minimum benchmark threshold the reduction in land value (at 25%) is at the margins of what is considered acceptable. In Zone 2 the impact of Policy H5 (Option 2) on Brownfield sites is at the margins of what we consider would be acceptable. Whilst land values for medium sized Brownfield sites in the City Centre (Zone 4) exceed the minimum benchmark threshold the reduction in value at 32% is unacceptable.
- The impact of Policy H5 (Option 2) has a greater impact on large Greenfield sites. The viability of large Greenfield sites is simply compounded in Zone 2a. In addition land values for large Greenfield sites in Zone 2b fall below the minimum benchmark value. Large Greenfield sites in Zones 1 and 3 remain viable. In terms of large Brownfield sites development becomes unviable in Zone 2a and land values fall below the minimum benchmark land value in Zone 2b. Whilst the land values exceed the minimum benchmark land values in Zones 1, 3 and 4 the reduction in land value is unacceptable, in our opinion, within Zones 1 and 4. Large Brownfield sites within Zone 3 remain viable.
- The impact of Policy H5 (Option 2) on strategic sites is acceptable³⁹

³⁶ This includes affordable tenures such as shared ownership and discount sale or sub market rental.

³⁷ This tenure includes social rented housing and affordable tenured housing

³⁸ Due to the nature of the land supply (previously developed sites) it is assumed all sites within the City Centre would be Brownfield.

³⁹ As outlined previously our assessment assumes that Strategic Sites will be Greenfield

Policy H5 – Option 3

Zone	Requirement	
Zone 1	40%	Option 3 adds 5% to current policy requirements within Zones 1 and 2 and 10% within Zones 3 and 4. Option 3 also proposes that half of the affordable homes in Zones 1 and 2 should be home ownership dwellings with the remaining 50% being for households on lower decile earnings. Within Zones 3 and 4 it is proposed that two thirds of the affordable homes should be home ownership dwellings with the remaining dwelling being for households on lower decile earnings. Options 3 also assumes that there will be provision of Starter Homes. Option 3 requires 50% of home ownership dwellings to be starter homes.
Zone 2	20%	
Zone 3	15%	
Zone 4	15%	

- Option 3 lowers the value of small Greenfield sites by 15% in Zone 1 and 21% in Zone 2b. Values for small Greenfield sites in Zone 3 fall by around 16%. These reductions are all within acceptable limits. However, the value of small Greenfield sites within Zone 2a falls by 84%, which is unacceptable. All of the land values for small Greenfield sites, with the exception of those within Zone 2a, exceed the minimum benchmark thresholds after applying Policy H5 (Option 3). In terms of the Brownfield sites the land values for small, after the application of Policy H5 (Option 3), exceed the minimum benchmark thresholds in all areas except in Zones 2a where development on brownfield land becomes unviable and Zone 4 (City Centre), which sees land values for small sites reduced by 78%.
- The impact of Policy H5 (Option3) on medium and large Greenfield sites is very similar to that evidenced on the small sites. For medium sized Brownfield sites the application of Policy H5 (Option 3) is viable in Zones 1 and 2 but is marginal within Zone 3. Development of medium sized Brownfield sites becomes unviable in Zone 2a and the reduction in land values for medium Brownfield sites in Zone 4 (City Centre) is considered to excessive, in our opinion, at 38%. The land values for large Brownfield sites falls below the minimum benchmark land values in Zones 2a and 2b (arguably the land value is so low in Zone 2a that development could be construed as being unviable). Whilst land values exceed the minimum land value benchmarks in Zones 3 and 4 the reduction in Land values at 28% in Zone 3 is marginal and a reduction of 43% in Zone 4 is considered unacceptable.
- The impact of Policy H5 (Option 3) on strategic sites is acceptable⁴⁰

⁴⁰ As outlined previously our assessment assumes that Strategic Sites will be Greenfield

Policy H5 – Option 4

Zone	Requirement	
Zone 1	40%	Option 4 adds 5% to current policy requirements within Zones 1 and 2 and 10% within Zones 3 and 4. Option 4 also proposes that half of the affordable homes in Zones 1 and 2 should be home ownership dwellings with the remaining 50% being for households on lower decile earnings. Within Zones 3 and Zone 4 it is proposed that two thirds of the affordable homes should be home ownership dwellings with the remaining dwelling being for households on lower decile earnings. Option 4 also assumes that there will be provision of Starter Homes. Option 4 requires that 100% of home ownership dwellings to be starter homes.
Zone 2	20%	
Zone 3	15%	
Zone 4	15%	

- Option 4 actually improves the land value for small Greenfield sites in Zone 1. This is because Option 4 requires half of the affordable homes in Zone 1 to be starter homes which are valued based on 80% of market value. The values of small Greenfield sites in Zones 2b and 3 fall by 14% and 6% respectively which is within acceptable limits. The value of land within Zone 2a falls by 66% after the imposition of Policy H5 (Option 4), which, in our opinion is unacceptable. In addition the land values generated in Zone 2a falls below the minimum benchmark threshold. The values for small Greenfield sites within the remaining zones exceed the minimum land value benchmarks. The results for small Brownfield sites are broadly similar to those identifies for small Greenfield sites. However, the land values from small Brownfield sites within the city centre (Zone 4) fall by around 55% which is considered unacceptable.
- The value of medium sites (Greenfield and Brownfield) in Zones 1, 2a and 2b increase albeit the land values generated in Zone 2a remain below the minimum benchmark land values. Within Zone 3 the value of medium sized Greenfield sites falls by circa 8% and medium sized Brownfield sites fall by circa 12%. These reductions are acceptable and in both cases the land values generated exceed the minimum benchmark land values. The value of medium sized Brownfield sites in the City Centre fall by circa 17%, which is acceptable. The land values generated also exceed the minimum benchmark land value.
- The impact of Policy H5 (option 4) on large (Greenfield and Brownfield) sites is very similar to that experienced on medium sized sites. However, the value of large Brownfield sites within Zone 2b falls below the minimum benchmark land values. The value of large Brownfield sites in the City Centre fall by circa 20% and whilst this is acceptable the land values generated fall marginally below the minimum benchmark land values.
- The impact of Policy H5 (Option 4) on strategic sites is acceptable⁴¹

⁴¹ As outlined previously our assessment assumes that Strategic Sites will be Greenfield

9. New Policy on Minimum Space Standards (Policy H9) and their impact on Viability

- 9.1 Since the last EVS was published the Housing Standards Review has introduced a new single standard for minimum space requirements. National Planning Guidance is clear that if a Local Planning Authority chooses to adopt minimum space standards, then these must be those which are set out in Table 18. The minimum space requirements are for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height. The standards are organised by storey height to take account of the extra circulation space needed for stairs to upper floors, and deal separately with one storey dwellings (typically flats) and two and three storey dwellings (typically houses).
- 9.2 National Guidance sets out that where a need for internal space standards is identified⁴², local planning authorities should provide justification for requiring internal space policies. Local planning authorities should also take account of viability and the impact of adopting the space standard as part of a plan's viability assessment.

Table 18 – Minimum Space Standards

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

- 9.3 The National Space Standards relative to the typologies being appraised within this assessment are compared within Table 19.

⁴² Note this assessment does not consider the issue of need.

Table 19 – Space Standards Difference

Dwelling Type	No Persons	National Space Standards (sq.m)	Space Standards used in baseline appraisals (sq.m)	Space Standard Difference (sq.m)
Studio apartments	1 person	39	40	-1
1 bed apartment	2 persons	50	45	+5
2 bed apartment	4 persons	61	60	+1
3 bed apartment	5 persons	86	90	-4
2 bed house	3 persons	70	70	-
3 bed house	5 persons	84	90	-6
4 bed house	6 persons	115	125	-10
5 bed house	7 persons	128	165	-37

- 9.4 As outlined above the assumptions used in the baseline appraisals exceed the National Space Standards in the majority of cases. The notable exceptions are 1 bed and 2 bed apartments.
- 9.5 For the purpose of our assessment we have assumed that those units which exceed the National Space Standards remain as per the assumptions applied in the base appraisals (i.e. we have not reduced their sizes to align with the space standards). Therefore, when testing the impact of Policy H9 we have only increased the size of the 1 and 2 bed apartments.
- 9.6 Whilst the larger units will increase costs some of the additional costs will be offset by additional revenue. For relatively small areas (i.e. an additional 1 to 2sq.m of floor space) 90% of the additional cost is usually recovered via additional revenue. However, the ability to recover the additional costs decreases as the amount of extra floorspace increases. For example it is estimated⁴³ that only 60% of the costs can be recovered for an additional 10sq.m of floorspace. Given that most of the changes, relative to the space standards applied within our baseline appraisals are limited and range between 1sq.m and 5sq.m we have assumed that 80% cost recover is achieved. On this basis the extra over costs specified in Table 20 are included for Policy H9.

Table 20 – Policy H9 on Costs

Studio Apts	1 bed apts	2 bed apts	3 bed apts	2 bed house	3 bed house	4 bed house	5 bed house
-	£1,265	£253	-	-	-	-	-

⁴³ Housing Standards Review – Cost Impacts Assessment September 2014

Impact of Policy H9 – New Policy on Housing Space Standards

- 9.7 The impacts associated with a new policy on housing space standards are highlighted in Tables 21 and 22.

Table 21 - Impact of New Policy H9 (Housing Space Standards) on Greenfield Sites

Site Typology	Zone	Base Case ⁴⁴	Base Case (Plus H9)	% Change
Small Sites	Zone 1	£364,724	£364,724	0.0%
	Zone 2	£316,181	£316,181	0.0%
	Zone 2b	£557,217	£557,217	0.0%
	Zone 3	£617,228	£617,228	0.0%
Medium Sites	Zone 1	£368,744	£368,744	0.0%
	Zone 2	£136,862	£136,862	0.0%
	Zone 2b	£307,109	£307,109	0.0%
	Zone 3	£382,288	£382,288	0.0%
Large Sites	Zone 1	£391,696	£391,655	0.0%
	Zone 2	£139,843	£139,843	0.0%
	Zone 2b	£218,252	£218,252	0.0%
	Zone 3	£394,704	£394,704	0.0%
Strategic Sites	Zone 1	£431,863	£430,982	-0.2%
	Zone 2b	£239,403	£238,817	-0.2%

%	Land value reduced by less than 25% = Acceptable
%	Land value reduced by between 25% and 30% = Marginal
%	Land value reduced by more than 30% = Unacceptable

£	Significantly Exceeds benchmark Land Value = Acceptable
£	Slightly above or below the Benchmark land Value = Marginal
£	Significantly Below Benchmark Land Value = Unacceptable

- 9.8 Because the assumptions on unit sizes applied in the baseline appraisals exceed the National Space Standards, in the majority of cases, a new policy on housing space standards has no impact on viability. The notable exception is strategic sites which see a marginal reduction in land values. This is because we included a small number of apartments as part of the overall mix of development on these strategic sites and it is the 1 bed and 2 bed apartments within our assessment that see an increase in floorspace after the application of Policy H9.

⁴⁴ Includes Policy H5 (Option 1), Updated Policies EN1 and EN2 and Index increased CIL

- 9.9 On this basis it is logical to conclude that the biggest impact of Policy H9 will be witnessed in the City Centre (Zone 4) where nearly all the schemes will be apartment led. This is clearly evident within Table 22 but even in the City Centre (Zone 4) land values only fall by around 3 or 4% which is well within acceptable limits.
- 9.10 The land values within the City Centre are also significantly higher than the minimum benchmark land values.

Table 22 – Impact of New Policy H9 (Housing Space Standards) on Brownfield Sites

Site Typology	Zone	Base Case ⁴⁵	Base Case (Plus H9)	% Change
Small Sites	Zone 1	£268,797	£268,797	0%
	Zone 2	£193,531	£193,531	0%
	Zone 2b	£438,452	£438,452	0%
	Zone 3	£497,098	£497,098	0%
	Zone 4	£1,593,694	£1,534,725	-4%
Medium Sites	Zone 1	£253,396	£253,396	0%
	Zone 2	£11,423	£11,423	0%
	Zone 2b	£194,296	£194,296	0%
	Zone 3	£262,157	£262,157	0%
	Zone 4	£1,253,172	£1,218,774	-3%
Large Sites	Zone 1	£273,423	£273,382	0%
	Zone 2	£19,712	£19,712	0%
	Zone 2b	£103,887	£103,887	0%
	Zone 3	£274,573	£274,573	0%
	Zone 4	£877,777	£850,077	-3%

%	Land value reduced by less than 25% = Acceptable	£	Significantly exceeds Benchmark Land Value = Acceptable
%	Land value reduced by between 25% and 30% = Marginal	£	Slightly above or below the Benchmark land Value = Marginal
%	Land value reduced by more than 30% = Unacceptable	£	Significantly below Benchmark Land Value = Unacceptable

⁴⁵ Includes Policy H5 (Option 1), Updated Policies EN1 and EN2 and Index increased CIL

10. New Policy on Accessible Housing Standards (Policy H10) and their impact on Viability

10.1 As a result of the Housing Standards Review the Government announced, via the Written Ministerial Statement (WMS), a new national approach to the setting of technical housing standards in England. This was accompanied by the publication of a new set of streamlined national technical standards, which included 2 optional Building Regulation standards covering accessible housing, creating a 3 tier system of standards which is now contained within Volume 1 of Part M of the Building Regulations and is made up of:

- M4(1) Category 1 – Visitable dwellings
- M4 (2) Category 2 – Accessible and adaptable dwellings
- M4 (3) Category 3 – Wheelchair user dwellings

10.2 Only one of the three technical standards can be applied to a single dwelling:

M4 (1) Category 1 – Visitable Dwellings

10.3 This standard is a mandatory requirement and should be applied to all dwellings to which Part M of the Building Regulations applies, unless one of the optional standards either M4 (2) or M4 (3) is to apply.

10.4 This standard has not changed since the 2004 edition of Part M of the Building Regulations and provides a very basic level of accessibility which may not be suitable for many disabled people and limits levels of adaptability should a resident require adaptations for access reasons.

10.5 As M4(1) is mandatory and automatically applied via the Building Regulations process where an optional standard is not applied M4(1) will not be a requirement of any DPD that the Council produces in relation to accessible housing and, therefore, is not being appraised within this assessment.

M4 (2) Category 2 – Accessible and Adaptable Dwellings

10.6 M4 (2) is an optional Building Regulation, which can be applied to a development if 'switched on' / required by a planning condition. The optional technical standard M4(2) provides homes suitable for a diverse population and many of the features of an M4(2) home will benefit disabled people, older people, families with young children and people with temporary impairments or injuries etc.

10.7 M4 (2) accessible and adaptable dwellings replaces and is the nearest technical housing standard to the previously recognised 'Lifetime Homes' standard.

- 10.8 A study undertaken by EC Harris (on behalf of Department for Communities and Local Government) in September 2014 examined the cost impacts of the Housing Standards Review. The study concluded that the cost of providing Category 2 – accessible and adaptable dwellings would cost an additional (extra over industry practice) £907 to £940 per property for apartments and between £520 and £523 per property for housing.
- 10.9 For the purpose of this assessment we have included an average cost of £924 per apartment and £521.5 per property for traditional housing. It should be noted that these costs exclude the costs of additional space associated with the access standard. The same report by EC Harris estimates these costs to range between £1,444 (cost for an additional 2sq.m) and £2,166 (cost for an additional 3sq.m) per property for housing and £722 (cost for additional 1sq.m) per apartment.
- 10.10 However, for private and intermediate (i.e. sub market housing), the changes / increase in space standards can also have an impact on sales value which may offset some or all of the additional build cost. This fact was recognised within the EC Harris report which concluded that for relatively small areas (i.e. and additional 1 to 2sq.m of floor space) 90% of the additional cost is recovered via sales values. However, the ability to recover the additional costs by sales reduces as the amount of additional space increases.
- 10.11 Given that the extra space standards associated with M4 (2) are expected to range between 2 and 3sq.m we have assumed that approximately 80% of the extra space related costs can be recovered.
- 10.12 Within this context and for the purpose of clarity the following costs have been incorporated into the assessment for M4 (2) Category 2 – Accessible and Adaptable Dwellings.

Table 23 - Cost of providing M4 (2) Accessible and Adaptable standards

Category	Average cost per property	
	Apartments	Housing
Category 2 - access	£924	£521.5
Category 2 – access related space costs	£144	£361
Total Category 2 Accessible⁴⁶	£1,068	£882.5

Optional Technical Standards M4 (3)

- 10.13 M4 (3) is also an optional building regulation which can be to a development if it is switched on by a planning condition. This optional requirement states that reasonable provision must be made for people to gain access to and use the dwelling and its facilities and that this provision must be sufficient to allow simple adaption of the dwelling to meet the needs of occupants who use wheelchairs; or meeting the needs of occupants who use wheelchairs.

⁴⁶ Note that for social rented housing there will be limited opportunity to offset the access related space costs through increased sales value. Therefore the costs have been included in full meaning the overall costs for social rented properties are £1,646 per property for apartments and £2,326.5 per property for social housing.

10.14 M4 (3) homes are therefore designed to be either:

- Wheelchair accessible (M4(3)(2)(b)); Wheelchair accessible homes are designed to be usable for a wheelchair user from the outset (i.e. at the point of completion a wheelchair user could live in the home and it is fitted out with all the services and equipment required); or
- Wheelchair adaptable (M4 (3)(2)(a)). Wheelchair adaptable homes are designed to incorporate the space, electrical and plumbing requirements to allow a property to become wheelchair accessible for a particular user at a later date, easily and cheaply.

10.15 A local authority should, therefore, only require wheelchair accessible homes (as opposed to wheelchair adaptable homes), where they are responsible for allocating or nominating the end user of the dwelling. Generally M4 (3) homes are, therefore, likely to be wheelchair adaptable as opposed to accessible.

10.16 The EC Harris Report concluded that the cost of wheelchair accessible (M4 (3) (2) (b)) standards increases the costs (above current industry standards) by between £7,764 and £8,048 per property for apartments and between £22,238 and £23,052 per property for housing. For wheelchair adaptable housing ((M4 (3) (2) (a)) the extra over costs range between £7,607 and £7,891 for apartments and £9,754 to £10,566 per property for houses.

10.17 The costs associated with the additional space requirements for wheelchair accessible and adaptable standards is estimated to range between £15,162 (additional 21sq.m) and £17,328 (additional 24 sq.m) per property for housing and between £5,776 (additional 8sq.m) and £10,108 (additional 14sq.m) per property for apartments. For the purposes of this study, based on the findings within the EC Harris cost report, we have assumed that 60% of these costs would be recovered through increased sales revenue. For the purpose of this assessment the following costs have been included.

Table 24 - Accessible Costs

Category	Average cost per property	
	Apartments	Housing
Category 3 – Accessible	£7,906	£22,645
Category 3 – Accessible extra space costs	£3,177	£6,498
Total Category 3 Accessible⁴⁷	£11,083	£29,143

Table 25 - Adaptable Costs

Category	Average cost per property	
	Apartments	Housing
Category 3 – Adaptable	£7,749	£10,160
Category 3 – Adaptable extra space costs	£3,177	£6,498
Total Category 3 Adaptable⁴⁸	£10,926	£16,658

⁴⁷ For social rented housing the costs are £15,848 per property for apartments and £38,890 per property for social housing

Policy H10 Proposed Levels of Accessible Housing

- 10.18 For the new optional Building Regulation (M4 (2) or M4 (3)) to be applied, a planning condition on the planning permission must require it. This in the case of Leeds City Council, as outlined previously, will involve the introduction of new planning policy which covers accessible housing (Policy H10).
- 10.19 The three technical housing standards can generally only be applied to 'new build' dwellings and would not apply to conversion work or change of use (to residential) applications to existing buildings. The Council has confirmed that any planning policy requirements in relation to the optional Building Regulations (M4 (2) and M4 (3)) will reflect these limitations.
- 10.20 Policy H10 requires that all new build residential developments should provide a proportion of accessible dwellings and within this assessment we have tested the viability of the following options,

Table 26 – Accessible Housing Options

	M4(3) Adaptable			M\$ (3) Accessible		
Category	Option 1	Option 2	Option 3	Option 1a	Option 2a	Option 3a
M4 (2)	30%	35%	40%	30%	35%	40%
M4 (3) – Adaptable	2%	3%	5%	-	-	-
M4 (3) Accessible	-	-	-	2%	3%	5%

- 10.21 The viability of these policy suggestions, with reference to their impact on the baseline land values (refer to Section x) has been tested by layering on the costs highlighted in Tables 24 and Table 25. The results of this exercise are summarised in Tables 27 to 30.

Impact of Policy H10 – New Policy on Housing Access Standards

- 10.22 The impact of Policy H10 is well within acceptable limits. Greenfield land values fall by between 1% and 3% assuming Option 1 and adaptable dwellings. The notable exception is Zone 2a where land values fall by 6% but this is because the reduction in land value is being assessed off a much lower base land value meaning the impact (in % terms) is greater. However, even in Zone 2a the actual reduction in land value is still within acceptable limits albeit the land values remain below the minimum benchmark thresholds. Even when applying the more onerous Policy suggestion of Option 3a and accessible dwellings⁴⁹ Greenfield land values only reduce by between 3% and 10% albeit the reduction in land values within Zone 2a is higher, particularly for medium and large sites, at circa 17%. Again this is because the fall in value is being assessed off a much lower base land value.

⁴⁸ The costs for social rented housing are £15,691 per property for apartments and £26,405 per property for social housing

⁴⁹ Option 3a – 40% M4 (2) dwellings and 5% M4 (3) dwellings

- 10.23 The impact of Policy H10 on Brownfield sites is similar to that witnessed on Greenfield sites. The notable exception is large Brownfield sites for which the land values generated fall below the minimum benchmark land values after the application of Policy H10.

Table 27 - Impact of New Policy H10 (including Adaptable Dwellings) on Greenfield Sites

Site Typology	Zone	Base Case ⁵⁰	Base Case (Plus H10 – Option 1)	% Change	Base Case (Plus H10 – Option 2)	% Change	Base Case (Plus H10 – Option 3)	% Change
Small Sites	Zone 1	£364,724	£354,242	-3%	£350,795	-4%	£344,801	-5%
	Zone 2a	£316,181	£308,841	-2%	£306,254	-3%	£301,623	-5%
	Zone 2b	£557,217	£549,443	-1%	£546,715	-2%	£541,855	-3%
	Zone 3	£617,228	£609,447	-1%	£606,742	-2%	£601,923	-2%
Medium Sites	Zone 1	£368,744	£358,483	-3%	£355,101	-4%	£349,211	-5%
	Zone 2a	£136,862	£128,023	-6%	£125,013	-9%	£119,695	-13%
	Zone 2b	£307,109	£298,482	-3%	£295,547	-4%	£290,368	-5%
	Zone 3	£382,288	£374,439	-2%	£371,715	-3%	£366,867	-4%
Large Sites	Zone 1	£391,696	£381,637	-3%	£378,318	-3%	£372,535	-5%
	Zone 2a	£139,843	£131,346	-6%	£128,447	-8%	£123,323	-12%
	Zone 2b	£218,252	£209,731	-4%	£206,825	-5%	£201,691	-8%
	Zone 3	£394,704	£386,970	-2%	£384,277	-3%	£379,478	-4%
Strategic Sites	Zone 1	£431,863	£423,590	-2%	£420,868	-3%	£416,131	-4%
	Zone 2b	£239,403	£232,380	-3%	£229,996	-4%	£225,791	-6%

% Land value reduced by less than 25% = **Acceptable**
 % Land value reduced by between 25% and 30% = **Marginal**
 % Land value reduced by more than 30% = **Unacceptable**

£ Significantly exceeds benchmark Land Value = **Acceptable**
 £ Slightly above or below the Benchmark Land Value = **Marginal**
 £ Significantly below Benchmark Land Value = **Unacceptable**

⁵⁰ Includes Policy H5 (Option 1), Updated Policies EN1 and EN2 and Index increased CIL

Table 28 - Impact of New Policy H10 (including Accessible Dwellings) on Greenfield Sites

Site Typology	Zone	Base Case ⁵¹	Base Case (Plus H10 – Option 1a)	% Change	Base Case (Plus H10 – Option 2a)	% Change	Base Case (Plus H10 – Option 3a)	% Change
Small Sites	Zone 1	£364,724	£351,633	-4%	£346,883	-5%	£338,279	-7%
	Zone 2	£316,181	£306,591	-3%	£302,879	-4%	£295,998	-6%
	Zone 2b	£557,217	£547,125	-2%	£543,237	-3%	£536,058	-4%
	Zone 3	£617,228	£607,151	-2%	£603,297	-2%	£596,181	-3%
Medium Sites	Zone 1	£368,744	£355,909	-3%	£351,239	-5%	£342,774	-7%
	Zone 2	£136,862	£125,568	-8%	£121,329	-11%	£113,556	-17%
	Zone 2b	£307,109	£296,096	-4%	£291,968	-5%	£284,403	-7%
	Zone 3	£382,288	£372,135	-3%	£368,259	-4%	£361,108	-6%
Large Sites	Zone 1	£391,696	£379,106	-3%	£374,521	-4%	£366,206	-7%
	Zone 2	£139,843	£128,973	-8%	£124,888	-11%	£117,392	-16%
	Zone 2b	£218,252	£207,356	-5%	£203,263	-7%	£195,754	-10%
	Zone 3	£394,704	£384,679	-3%	£380,840	-4%	£373,749	-5%
Strategic Sites	Zone 1	£431,863	£421,560	-2%	£417,822	-3%	£411,054	-5%
	Zone 2b	£239,403	£230,471	-4%	£227,133	-5%	£221,019	-8%

% Land value reduced by less than 25% = **Acceptable**
 % Land value reduced by between 25% and 30% = **Marginal**
 % Land value reduced by more than 30% = **Unacceptable**

£ Significantly exceeds benchmark Land Value = **Acceptable**
 £ Slightly above or below the Benchmark Land Value = **Marginal**
 £ Significantly below Benchmark Land Value = **Unacceptable**

⁵¹ Includes Policy H5 (Option 1), Updated Policies EN1 and EN2 and Index increased CIL

Table 29 - Impact of New Policy H10 (including Adaptable Dwellings) on Brownfield Sites

Site Typology	Zone	Base Case ⁵²	Base Case (Plus H10 – Option 1)	% Change	Base Case (Plus H10 – Option 2)	% Change	Base Case (Plus H10 – Option 3)	% Change
Small Sites	Zone 1	£268,797	£261,972	-3%	£259,725	-3%	£255,816	-5%
	Zone 2	£193,531	£185,956	-4%	£183,286	-5%	£178,506	-8%
	Zone 2b	£438,452	£433,559	-1%	£431,834	-2%	£428,747	-2%
	Zone 3	£497,098	£489,317	-2%	£486,611	-2%	£481,792	-3%
	Zone 4	£1,593,694	£1,539,068	-3%	£1,522,580	-4%	£1,495,018	-6%
Medium Sites	Zone 1	£253,396	£245,274	-3%	£242,597	-4%	£237,935	-6%
	Zone 2	£11,423	£2,401	-79%	£0	-100%	£0	-100%
	Zone 2b	£194,296	£189,961	-2%	£188,488	-3%	£185,889	-4%
	Zone 3	£262,157	£254,309	-3%	£251,585	-4%	£246,737	-6%
	Zone 4	£1,253,172	1,198,898	-4%	£1,182,540	-6%	1,155,212	-8%
Large Sites	Zone 1	£273,423	£264,802	-3%	£261,957	-4%	£257,001	-6%
	Zone 2	£19,712	£11,188	-43%	£8,196	-58%	£2,817	-86%
	Zone 2b	£103,887	£101,054	-3%	£100,088	-4%	£98,380	-5%
	Zone 3	£274,573	£266,840	-3%	£264,147	-4%	£259,348	-6%
	Zone 4	£877,777	835,148	-5%	£822,303	-6%	800,846	-9%

% Land value reduced by less than 25% = **Acceptable**
 % Land value reduced by between 25% and 30% = **Marginal**
 % Land value reduced by more than 30% = **Unacceptable**

£ Significantly exceeds benchmark Land Value = **Acceptable**
 £ Slightly above or below the Benchmark Land Value = **Marginal**
 £ Significantly below Benchmark Land Value = **Unacceptable**

⁵² Includes Policy H5 (Option 1), Updated Policies EN1 and EN2 and Index increased CIL

Table 30 - Impact of New Policy H10 (including Accessible Dwellings) on Brownfield Sites

Site Typology	Zone	Base Case ⁵³	Base Case (Plus H10 – Option 1)	% Change	Base Case (Plus H10 – Option 2)	% Change	Base Case (Plus H10 – Option 3)	% Change
Small Sites	Zone 1	£268,797	£260,267	-3%	£257,169	-4%	£251,555	-6%
	Zone 2	£193,531	£183,634	-5%	£179,803	-7%	£172,700	-11%
	Zone 2b	£438,452	£432,059	-1%	£429,584	-2%	£424,997	-3%
	Zone 3	£497,098	£487,020	-2%	£483,166	-3%	£476,051	-4%
	Zone 4	£1,593,694	£1,532,017	-4%	£1,512,004	-5%	£1,477,391	-7%
Medium Sites	Zone 1	£253,396	£243,236	-4%	£239,540	-5%	£232,840	-8%
	Zone 2	£11,423	£0	-100%	£0	-100%	£0	-100%
	Zone 2b	£194,296	£188,765	-3%	£186,695	-4%	£182,901	-6%
	Zone 3	£262,157	£252,005	-4%	£248,129	-5%	£240,977	-8%
	Zone 4	£1,253,172	£1,192,399	-5%	£1,172,792	-6%	£1,138,965	-9%
Large Sites	Zone 1	£273,423	£262,633	-4%	£258,704	-5%	£251,579	-8%
	Zone 2	£19,712	£8,739	-56%	£4,465	-77%	£0	-100%
	Zone 2b	£103,887	£100,263	-3%	£98,901	-5%	£96,403	-7%
	Zone 3	£274,573	£264,548	-4%	£260,709	-5%	£253,619	-8%
	Zone 4	£877,777	£830,112	-5%	£814,748	-7%	£788,254	-10%

% Land value reduced by less than 25% = **Acceptable**
 % Land value reduced by between 25% and 30% = **Marginal**
 % Land value reduced by more than 30% = **Unacceptable**

£ Significantly Exceeds benchmark Land Value = **Acceptable**
 £ Slightly above or below the Benchmark land Value = **Marginal**
 £ Significantly Below Benchmark Land Value = **Unacceptable**

⁵³ Includes Policy H5 (Option 1), Updated Policies EN1 and EN2 and Index increased CIL

11. Review of Policy G4 (Greenspace in Residential Development) and its impact on viability

- 11.1 Policy G4 of the adopted Core Strategy seeks an onsite provision of green space of 80sq.m per residential unit on developments of 10 or more dwellings outside of the City Centre (Zone 4) and in excess of 720 meters from a community park, and for those which are located in areas deficient of Greenspace. In areas of adequate supply Policy G4 states that an equivalent value towards the safeguarding and improvement of existing green space will take priority over the creation of new areas.
- 11.2 As part of the Selective Review of the Core Strategy the Council wish to understand the viability of the following options.

Table 31 – Policy G4 Greenspace Options

	Option 1	Option 2	Option 3	Option 4
Greenspace per dwelling	80sq.m	60sq.m	40sq.m	20sq.m

- 11.3 For the purpose of Policy G4 we have also assumed that a 10 year maintenance contribution will be required at a cost of £151,711.58 per hectare of the on-site Greenspace.
- 11.4 As an alternative to the provision of Greenspace on site, financial contributions can also help meet the demands of new residents on existing greenspaces. If off site financial contributions are to be accepted the Council has advised that these should be calculated to account for:
- The costs of laying out greenspace at £199,964.05 per hectare
 - 10 year maintenance sum (greenspace) at £151,711.58 per hectare
 - 10 year maintenance sum (average play area) at £31,455.64 per area⁵⁴
 - Per child contribution of £1,068.96 per child⁵⁵.
- 11.5 Policy G4 stipulates that any financial contributions will be used effectively to meet local needs for Greenspace.

Impact of Suggested Changes to Policy G4 – Greenspace in Residential Development

- 11.6 The impact of Policy G4 is generally viable albeit the policy simply compounds the viability challenges in Zone 2a.

⁵⁴ Policy G3 requires that 2 children's and young people's equipped play facilities are required per thousand people. Based on the typologies and housing mix applied within this EVS it is only the large and strategic sites that generate a need for on-site equipped play facilities. For large sites we have assumed 1 LEAP will be provided meaning there will be a maintenance sum of £31,455 and for the strategic sites we have assumed 2 NEAP's will be provided resulting in a maintenance liability of £62,911.28

⁵⁵ In most cases an off site play contribution is needed. The number of children is calculated at 10% of the number of flats / apartments multiplied by (4) added to 62% of the number of houses (dwellings) multiplied by (4).

- 11.7 As you would expect viability improves as the amount of open space per dwelling decreases. For example, at 20sq.m of open space per dwelling the reduction in Greenfield land values, which generally ranges between 7% and 8%, is well within acceptable limits and the land values generated (outside of zone 2a) all exceed the minimum benchmark land values.
- 11.8 The same is true when 40sq.m of open space per dwelling is required albeit the reduction in Greenfield land values is higher (ranging between 14% and 18%). However, the land values generated for large sites in Zone 2b become marginal.
- 11.10 The minimum benchmark land values are not achieved on the large sites within Zone 2b at the higher rate of 60sq.m per dwelling.
- 11.11 At 80sq.m open space per dwelling the land value of small sites becomes marginal in Zones 1 and 2a. The reduction in value of large Greenfield sites also become marginal (outside of Zone 2a in which the viability challenges are simply compounded).
- 11.12 Policy G4 has a much greater impact on the viability of Brownfield sites especially when applying Policy G4 at the upper thresholds of 80sq.m and 60sq.m. per dwelling.
- 11.13 It should be noted that when applying the higher open space requirements some of the medium sites (Greenfield and Brownfield) fall below the affordable housing threshold (as a result of a reduced number of dwellings to take into account policy G4). This has the result of 'skewing' the results especially in Zone 2b, where the impact is significantly less than in other areas of the City (this is just an anomaly of the modelling).
- 11.14 Having established the viability of the open space requirements the Council also wished to understand the implications on viability if the open space requirement was based on an amount of Greenspace per bed space. Recognising the previous results the Council derived that the following open space requirements could be accommodated, per bed space, without compromising viability.
- 1 bedroom dwelling – 23sq.m
 - 2 bedroom dwelling – 33sq.m
 - 3 bedroom dwelling – 44sq.m
 - 4 bedroom dwelling – 54sq.m
 - 5 or more bedroom dwelling – 66sq.m
 - Student bed spaces – 18sq.m
- 11.15 We have rerun the assessment of G4 based on the above and can confirm that the results of this assessment are almost identical to those which are based on a greenspace requirement of 40sq.m per dwelling.

Table 32 - Impact of Changes to Policy G4 (on site POS) on Greenfield Sites

Site Typology	Zone	Base Case ⁵⁶	Base Case (Plus G4 – Option 1)	% Change	Base Case (Plus G4 – Option 2)	% Change	Base Case (Plus G4 – Option 3)	% Change	Base Case (Plus G4 – Option 4)	% Change
Small Sites	Zone 1	£364,724	£236,992	-35%	£287,486	-21%	£322,243	-12%	£348,474	-4%
	Zone 2a	£316,181	£237,133	-25%	£253,742	-20%	£272,389	-14%	£292,889	-7%
	Zone 2b	£557,217	£423,798	-24%	£453,497	-19%	£476,585	-14%	£514,294	-8%
	Zone 3	£617,228	£540,877	-12%	£574,664	-7%	£525,421	-15%	£568,322	-8%
Medium Sites	Zone 1	£368,744	£279,698	-24%	£290,651	-21%	£306,942	-17%	£337,554	-8%
	Zone 2a	£136,862	£102,928	-25%	£72,881	-47%	£91,735	-33%	£112,823	-18%
	Zone 2b	£307,109	£280,292	-9%	£305,159	-1%	£313,216	2%	£278,593	-9%
	Zone 3	£382,288	£294,961	-23%	£318,105	-17%	£344,092	-10%	£348,787	-9%
Large Sites	Zone 1	£391,696	£295,225	-25%	£313,601	-20%	£337,603	-14%	£363,146	-7%
	Zone 2a	£139,843	£96,293	-31%	£104,836	-25%	£115,328	-18%	£124,196	-11%
	Zone 2b	£218,252	£159,624	-27%	£171,955	-21%	£185,339	-15%	£198,306	-9%
	Zone 3	£394,704	£295,202	-25%	£306,665	-22%	£332,407	-16%	£361,518	-8%
Strategic Sites	Zone 1	£431,863	£327,676	-24%	£349,438	-19%	£373,321	-14%	£400,431	-7%
	Zone 2b	£239,403	£177,576	-26%	£190,107	-21%	£204,701	-14%	£220,711	-8%

£	Land value reduced by less than 25% = Acceptable	£	Significantly exceeds Benchmark Land Value = Acceptable
£	Land value reduced by between 25% and 30% = Marginal	£	Slightly above or below the Benchmark Land Value = Marginal
£	Land value reduced by more than 30% = Unacceptable	£	Significantly below Benchmark Land Value = Unacceptable

⁵⁶ Includes Policy H5 (Option 1), Updated Policies EN1 and EN2 and Index increased CIL

Table 33 - Impact of Changes to Policy G4 (Financial Contribution) on Greenfield Sites

Site Typology	Zone	Base Case ⁵⁷	Base Case (Plus G4 – Option 1)	% Change	Base Case (Plus G4 – Option 2)	% Change	Base Case (Plus G4 – Option 3)	% Change	Base Case (Plus G4 – Option 4)	% Change
Small Sites	Zone 1	£364,724	£305,464	-16%	£311,053	-15%	£316,642	-13%	£324,031	-11%
	Zone 2a	£316,181	£250,297	-21%	£258,950	-18%	£267,602	-15%	£276,201	-13%
	Zone 2b	£557,217	£491,337	-12%	£499,869	-10%	£508,402	-9%	£516,876	-7%
	Zone 3	£617,228	£552,099	-11%	£560,482	-9%	£568,865	-8%	£577,248	-6%
Medium Sites	Zone 1	£368,744	£302,918	-18%	£311,391	-16%	£319,864	-13%	£328,337	-11%
	Zone 2a	£136,862	£69,366	-49%	£78,197	-43%	£86,948	-36%	£95,600	-30%
	Zone 2b	£307,109	£241,672	-21%	£250,199	-19%	£258,672	-16%	£267,122	-13%
	Zone 3	£382,288	£317,158	-17%	£325,541	-15%	£333,925	-13%	£342,308	-10%
Large Sites	Zone 1	£391,696	£325,262	-17%	£333,645	-15%	£342,028	-13%	£350,411	-11%
	Zone 2a	£139,843	£73,405	-48%	£81,788	-42%	£90,172	-36%	£98,555	-30%
	Zone 2b	£218,252	£151,974	-30%	£160,357	-27%	£168,741	-23%	£177,124	-19%
	Zone 3	£394,704	£329,574	-17%	£337,957	-14%	£346,341	-12%	£354,724	-10%
Strategic Sites	Zone 1	£431,863	£377,285	-13%	£384,271	-11%	£391,257	-9%	£398,243	-8%
	Zone 2b	£239,403	£184,750	-23%	£191,735	-20%	£198,721	-17%	£205,707	-14%

£	Land value reduced by less than 25% = Acceptable	£	Significantly exceeds Benchmark Land Value = Acceptable
£	Land value reduced by between 25% and 30% = Marginal	£	Slightly above or below the Benchmark Land Value = Marginal
£	Land value reduced by more than 30% = Unacceptable	£	Significantly below Benchmark Land Value = Unacceptable

⁵⁷ Includes Policy H5 (Option 1), Updated Policies EN1 and EN2 and Index increased CIL

Table 34 - Impact of Changes to Policy G4 (on site POS) on Brownfield Sites

Site Typology	Zone	Base Case ⁵⁸	Base Case (Plus G4 – Option 1)	% Change	Base Case (Plus G4 – Option 2)	% Change	Base Case (Plus G4 – Option 3)	% Change	Base Case (Plus G4 – Option 4)	% Change
Small Sites	Zone 1	£268,797	£160,675	-40%	£200,465	-25%	£222,944	-17%	£235,289	-12%
	Zone 2a	£193,531	£118,008	-39%	£133,730	-31%	£151,382	-22%	£171,237	-12%
	Zone 2b	£438,452	£323,158	-26%	£346,979	-21%	£373,726	-15%	£403,972	-8%
	Zone 3	£497,098	£426,400	-14%	£459,020	-8%	£408,465	-18%	£449,882	-9%
Medium Sites	Zone 1	£253,396	£180,205	-29%	£184,130	-27%	£210,691	-17%	£232,380	-8%
	Zone 2a	£11,423	£0	-100%	£0	-100%	£0	-100%	£0	-100%
	Zone 2b	£194,296	£186,348	-4%	£204,214	5%	£212,017	9%	£168,436	-13%
	Zone 3	£262,157	£180,485	-31%	£202,461	-23%	£227,136	-13%	£230,347	-12%
Large Sites	Zone 1	£273,423	£186,783	-32%	£202,765	-26%	£224,840	-18%	£247,592	-9%
	Zone 2a	£19,712	£0	-100%	£0	-100%	£0	-100%	£5,518	-72%
	Zone 2b	£103,887	£69,416	-33%	£77,134	-26%	£84,837	-18%	£92,909	-11%
	Zone 3	£274,573	£180,726	-34%	£191,020	-30%	£215,451	-22%	£243,078	-11%

% Land value reduced by less than 25% = **Acceptable**
 % Land value reduced by between 25% and 30% = **Marginal**
 % Land value reduced by more than 30% = **Unacceptable**

£ Significantly exceeds Benchmark Land Value = **Acceptable**
 £ Slightly above or below the Benchmark Land Value = **Marginal**
 £ Significantly below Benchmark Land Value = **Unacceptable**

⁵⁸ Includes Policy H5 (Option 1), Updated Policies EN1 and EN2 and Index increased CIL

Table 35 - Impact of Changes to Policy G4 (Financial Contribution) on Brownfield Sites

Site Typology	Zone	Base Case ⁵⁹	Base Case (Plus G4 – Option 1)	Case G4 – % Change	Base Case (Plus G4 – Option 2)	% Change	Base Case (Plus G4 – Option 3)	% Change	Base Case (Plus G4 – Option 4)	% Change
Small Sites	Zone 1	£268,797	£225,377	-16%	£230,966	-14%	£236,555	-12%	£242,143	-10%
	Zone 2a	£193,531	£125,488	-35%	£134,320	-31%	£143,151	-26%	£151,982	-21%
	Zone 2b	£438,452	£395,033	-10%	£400,621	-9%	£406,210	-7%	£411,799	-6%
	Zone 3	£497,098	£431,968	-13%	£440,351	-11%	£448,735	-10%	£457,118	-8%
Medium Sites	Zone 1	£253,396	£201,292	-21%	£207,999	-18%	£214,705	-15%	£221,412	-13%
	Zone 2a	£11,423	£0	-100%	£0	-100%	£0	-100%	£0	-100%
	Zone 2b	£194,296	£161,670	-17%	£165,923	-15%	£170,114	-12%	£174,306	-10%
	Zone 3	£262,157	£197,028	-25%	£205,411	-22%	£213,794	-18%	£222,177	-15%
Large Sites	Zone 1	£273,423	£216,552	-21%	£223,738	-18%	£230,923	-16%	£238,109	-13%
	Zone 2a	£19,712	£0	-100%	£0	-100%	£0	-100%	£0	-100%
	Zone 2b	£103,887	£81,859	-21%	£84,653	-19%	£87,448	-16%	£90,242	-13%
	Zone 3	£274,573	£209,444	-24%	£217,827	-21%	£226,210	-18%	£234,593	-15%

% Land value reduced by less than 25% = **Acceptable**
 % Land value reduced by between 25% and 30% = **Marginal**
 % Land value reduced by more than 30% = **Unacceptable**

£ Significantly exceeds Benchmark Land Value = **Acceptable**
 £ Slightly above or below the Benchmark Land Value = **Marginal**
 £ Significantly Below Benchmark Land Value = **Unacceptable**

⁵⁹ Includes Policy H5 (Option 1), Updated Policies EN1 and EN2 and Index increased CIL

12. New Policy EN8 (Electric Vehicle Charging Infrastructure) and its impact on viability

- 12.1 The review of Policies EN1 and EN2 provide an opportunity to give the standards for provision of Electric Vehicle Charging Points (EVCP) set out in the Parking SPD clear development plan status. This would help with implementation of Policy Air 1 (of the Natural Resources and Waste Plan), which seeks to improve air quality in Leeds.
- 12.2 Policy EN8 requires that all applications for new development which include the provision of parking spaces will be required to meet the minimum standard of provision of electric vehicle charging points specified in the West Yorkshire Air Quality and Emissions Technical Planning Guidance. For residential developments the guidance stipulates a requirements of 1 charging point per unit (dwelling with dedicated parking) or 1 charging point per 10 spaces (unallocated parking).
- 12.3 For the purpose of this assessment we have assumed that all dwellings (houses) will be provided with an electric vehicle charging point, which is clearly a worst case scenario. With respect to apartment schemes in the City Centre we have assumed that 1 charging point will be provided for every 10 apartments.
- 12.4 We have modelled the viability of policy EN8 by including an extra over cost of £100 for every charging point.

Impact of New Policy EN8 – Electric Vehicle Charging Infrastructure

- 12.5 As demonstrated in Tables 36 and 37 the impact of a new policy which seeks the provision of electric vehicle charging points is negligible.
- 12.6 Land values within Zone 2a (Greenfield) and Zone 2b (Brownfield) are still below the minimum benchmark thresholds but this is direct consequence of wider market factors rather than the specific requirements of Policy EN8. .

Table 36 - Impact of New Policy EN8 on Greenfield Sites

Site Typology	Zone	Base Case ⁶⁰	Base Case (Plus EN8)	% Change
Small Sites	Zone 1	£364,724	£363,362	-0.4%
	Zone 2a	£316,181	£314,843	-0.4%
	Zone 2b	£557,217	£555,879	-0.2%
	Zone 3	£617,228	£615,890	-0.2%

⁶⁰ Includes Policy H5 (Option 1), Updated Policies EN1 and EN2 and Index increased CIL

Site Typology	Zone	Base Case ⁶⁰	Base Case (Plus EN8)	% Change
Medium Sites	Zone 1	£368,744	£367,392	-0.4%
	Zone 2a	£136,862	£135,481	-1.0%
	Zone 2b	£307,109	£305,771	-0.4%
	Zone 3	£382,288	£380,950	-0.4%
Large Sites	Zone 1	£391,696	£390,358	-0.3%
	Zone 2	£139,843	£138,504	-1.0%
	Zone 2b	£218,252	£216,914	-0.6%
	Zone 3	£394,704	£393,366	-0.3%
Strategic Sites	Zone 1	£431,863	£430,748	-0.3%
	Zone 2b	£239,403	£238,288	-0.5%

Table 37 - Impact of New Policy EN8 on Brownfield Sites

Site Typology	Zone	Base Case ⁶¹	Base Case (Plus H9)	% Change
Small Sites	Zone 1	£268,797	£267,888	-0.3%
	Zone 2a	£193,531	£192,125	-0.7%
	Zone 2b	£438,452	£437,544	-0.2%
	Zone 3	£497,098	£495,735	-0.3%
	Zone 4	£1,593,694	£1,592,528	-0.1%
Medium Sites	Zone 1	£253,396	£252,306	-0.4%
	Zone 2a	£11,423	£9,988	-12.6%
	Zone 2b	£194,296	£193,615	-0.4%
	Zone 3	£262,157	£260,794	-0.5%
	Zone 4	£1,253,172	£1,252,043	-0.1%
Large Sites	Zone 1	£273,423	£272,255	-0.4%
	Zone 2a	£19,712	£18,349	-6.9%
	Zone 2b	£103,887	£103,432	-0.4%
	Zone 3	£274,573	£273,210	-0.5%
	Zone 4	£877,777	£876,894	-0.1%

⁶¹ Includes Policy H5 (Option 1), Updated Policies EN1 and EN2 and Index increased CIL

13. Cumulative Impact

- 13.1 We have previously set out the impact of the suggested policy changes being considered as part of the Core Strategy Selective Review in isolation. Within the following paragraphs we summarise the cumulative impact of these respective changes.
- 13.2 Due to the various sub options associated with Policies H5, H10 and G4 we have included individual cumulative assessments based on Policy H5 (affordable Housing).

Greenfield Results

- 13.3 The results of our assessment with respect to Greenfield sites are set out within Tables 38 to 41 and demonstrate the following.
- Policy H5 – Option 1. All of the suggested policy changes can be accommodated if G4 is limited to 20sq.m per dwelling. There are still problems in Zone 2a but the viability challenges are as a result of wider market factors rather than the specific requirements of the suggested policy changes. There are also issues of marginal viability for the larger sites within Zone 2b which are influenced to a greater or lesser extent depending on whether you adopt accessible or adaptable standards under Policy H10. If G4 is limited to 40sq.m per dwelling the viability of development in Zone 2a is simply compounded. However, the land values generated for large sites in Zone 2b fall below the Minimum Benchmark Land Values. Once again the viability is influenced to to a greater or lesser extent depending on which policy suggestion is applied under Policy H10.
 - As you increase the open space requirements under policy G4 the viability is reduced. For example at 80sq.m per dwelling in association with accessible dwellings the reduction in land values exceed 30% or are marginal at best (i.e. between 25% and 30%)⁶².
 - Policy H5 – Option 2. The cumulative impact of Option 2 in association with the other policy suggestions is excessive. The results indicate that compromises in other policy requirements will need to be made if H5 – Option 2 is to be progressed. Referring back to the individual assessments you will note that it is Policy H5 and Policy G4 that have the biggest impacts. Therefore, if the preference is to increase affordable housing Policy G4 may have to be dropped. It may also be prudent to based Policy H10 on adaptable standards rather than accessible standards as well as basing the policy requirement on the 30% M4 (2) and 2% M4 (3).
 - Policy H5 – Option 3. The position is improved slightly on H5 Option 2 because starter homes are introduced at 80% of market value. However, most of the issues identified with Policy H2 (Option 2) still remain.
 - Policy H5 – Option 4. This actually improves viability due to the starter homes being at 80% of Market Value.

⁶² It should not be forgotten that when applying the higher open space requirements some of the medium sites (Greenfield and Brownfield) fall below the affordable housing threshold (as a result of a reduced number of dwellings to take into account policy G4). This has the result of 'skewing' the results especially in Zone 2b, where the impact is significantly less than in other areas of the City (this is just an anomaly of the modelling).

Brownfield Results

- 13.4 The results of our assessment with respect to Brownfield sites are set out within Tables 42 to 45 and demonstrate the following. The findings are similar to those for Greenfield sites with respect to Brownfield sites outside of the City Centre. However, it is clear that all of the suggested policy changes can be sustained within the City centre assuming the requirements for affordable housing remain as currently set out under Policy H5 of the adopted Core Strategy (i.e. Policy H5 – Option 1).
- 13.5 The cumulative impact assuming Policy H5 (Option 2⁶³) reduces land values by more than 40% within the City Centre (Zone 4), which in our opinion is unacceptable. In addition the land values generated fall marginally below or slightly above the minimum benchmark land values.
- 13.6 The cumulative impact assuming Policy H5 (Option 3⁶⁴) reduces land values by between 46% and 92% within the City Centre (Zone 4), which is unacceptable. In addition the land values generated fall significantly below the minimum benchmark land value.
- 13.7 The cumulative impact assuming Policy H5 (Option 3⁶⁵) reduces land values by between 46% and 92% which again is unacceptable. In addition the land values generated fall significantly below the minimum benchmark land value.
- 13.8 The cumulative impact taking into account Policy H5 (Option 4⁶⁶) significantly reduces land values for small and large sites. Whilst the value of medium sized sites also fall the reductions are considered as the margins of what may be acceptable. With the exception of medium sized sites the land values generated also fall below the minimum benchmark land values.

Further Fine Grain Analysis within the City Centre and Inner Areas

- 13.9 It is accepted that most of the sites within the City Centre and Inner Area will be Brownfield. As outlined previously our assessment has assumed that all brownfield sites within these areas will be 100% contaminated and will require site preparation across the entire site. This is clearly a worst case

⁶³ Option 2 assumes there will be no national policy expectation for the provision of Starter Homes and adds 5% to current policy requirements. The threshold is also lowered to 10 dwellings. Both options assume that the mix of affordable housing should reflect local need with 40% of the affordable housing being for households on lower quartile earnings with the remaining 60% being for households on lower decile earnings.

⁶⁴ Option 3 adds 5% to current policy requirements within Zones 1 and 2 and 10% within Zones 3 and 4. Option 3 also proposes that half of the affordable homes in Zones 1 and 2 should be home ownership dwellings with the remaining 50% being for households on lower decile earnings. Within Zones 3 and 4 it is proposed that two thirds of the affordable homes should be home ownership dwellings with the remaining dwelling being for households on lower decile earnings. An option 3 also assumes that there will be provision of Starter Homes. Option 3 requires 50% of home ownership dwellings to be starter homes.

⁶⁵ Option 3 adds 5% to current policy requirements within Zones 1 and 2 and 10% within Zones 3 and 4. Option 3 also proposes that half of the affordable homes in Zones 1 and 2 should be home ownership dwellings with the remaining 50% being for households on lower decile earnings. Within Zones 3 and 4 it is proposed that two thirds of the affordable homes should be home ownership dwellings with the remaining dwelling being for households on lower decile earnings. An option 3 also assumes that there will be provision of Starter Homes. Option 3 requires 50% of home ownership dwellings to be starter homes.

⁶⁶ Option 4 adds 5% to current policy requirements within Zones 1 and 2 and 10% within Zones 3 and 4. Option 4 also proposes that half of the affordable homes in Zones 1 and 2 should be home ownership dwellings with the remaining 50% being for households on lower decile earnings. Within Zones 3 and Zone 4 it is proposed that two thirds of the affordable homes should be home ownership dwellings with the remaining dwelling being for households on lower decile earnings. Option 4 also assumes that there will be provision of Starter Homes. Option 4 requires that 100% of home ownership dwellings to be starter homes.

scenario and the reality is likely to be very different. For example not all of the sites will be contaminated and some may only have contamination present in limited areas across the site. Equally some of the sites may already be cleared and require little in the way of site preparation.

13.10 In order to understand the viability of these alternative scenarios the Council requested that we undertake further 'fine grained' viability analysis to understand if there was any scope to increase the affordable housing targets within the City Centre (Zone 4) and Inner Areas (Zone 3) In particular we have looked at the following scenarios.

- Scenario 1 – 100% contaminated and requires 100% site prep (existing base case);
- Scenario 2 - 75% contaminated and requires 75% site prep;
- Scenario 3 - 50% contaminated and requires 50% site prep;
- Scenario 4 - 25% contaminated and requires 25% site prep;
- Scenario 5 – no contamination but requires 100% site prep
- Scenario 6 – no contamination but requires 75% site prep
- Scenario 7 – no contamination but requires 50% site prep
- Scenario 8 – no contamination but requires 25% site prep
- Scenario 9 – 100% contamination but no site prep
- Scenario 10 – 75% contamination but no site prep
- Scenario 11 – 50% contamination but no site prep
- Scenario 12 – 25% contamination but no site prep

13.11 Within each scenario we have tested the level of affordable housing that can viably be delivered whilst also taking into account the cumulative impact of the following policy suggestions:

- Policy H10 (housing access standards) based on a requirement of 30% M4 (2) and 2% M4 (3). In addition we have tested viability on the assumption that dwellings are adaptable rather than accessible.
- A new policy (Policy H9) on minimum space standards is turned on.
- The maximum amount of greenspace being sought per dwelling, through Policy G4 (inner City Area), is capped at no more than 40sq.m. Policy G5 (City Centre) is turned on.
- A new policy on electric vehicle charging infrastructure (Policy EN8) is turned on.

Based on the findings of this work (see tables 46 and 47) affordable housing could be increased to 7% within the City Centre and Inner Area whilst maintaining the other policy requirements as set out above (as well as the retention of policies EN1 and EN2).

Table 38 - H5 Affordable Housing - Option 1 [CUMULATIVE] - GREENFIELD													
Base Case		Base Case plus		Base Case plus		Base Case plus		Base Case plus		Base Case plus		Base Case plus	
Policy H5 - Option 1		Policy EN8		Policy EN8		Policy EN8		Policy EN8		Policy EN8		Policy EN8	
Policy EN1		Policy H5 - Option 1		Policy H5 - Option 1		Policy H5 - Option 1		Policy H5 - Option 1		Policy H5 - Option 1		Policy H5 - Option 1	
Policy EN2		Policy H9		Policy H9		Policy H9		Policy H9		Policy H9		Policy H9	
INDEX increased CIL		Policy H10		Policy H10		Policy H10		Policy H10		Policy H10		Policy H10	
		M4 (2) - 30%		M4 (2) - 35%		M4 (2) - 40%		M4 (2) - 30%		M4 (2) - 35%		M4 (2) - 40%	
		M4 (3) - 2%		M4 (3) - 3%		M4 (3) - 5%		M4 (3) - 2%		M4 (3) - 3%		M4 (3) - 5%	
		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m	
		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)	
		Adaptable				Accessible							
Averages [small sites]													
Zone 1	E364,724	E230,854	-37%	E229,070	-37%	E225,969	-38%	E229,511	-37%	E227,055	-38%	E222,612	-39%
Zone 2a	E316,181	E230,136	-27%	E228,050	-28%	E224,316	-29%	E228,322	-28%	E225,329	-29%	E219,780	-30%
Zone 2b	E557,217	E416,599	-25%	E414,449	-26%	E410,620	-26%	E414,773	-26%	E411,711	-26%	E406,056	-27%
Zone 3	E617,228	E534,097	-13%	E532,076	-14%	E528,457	-14%	E532,339	-14%	E529,439	-14%	E524,063	-15%
Average [medium sites]													
Zone 1	E368,744	E270,617	-27%	E267,973	-27%	E263,368	-29%	E268,605	-27%	E264,954	-28%	E258,337	-30%
Zone 2a	E136,862	E94,983	-31%	E92,642	-32%	E88,504	-35%	E93,069	-32%	E89,770	-34%	E83,718	-39%
Zone 2b	E307,109	E272,777	-11%	E270,553	-12%	E266,589	-13%	E270,940	-12%	E267,777	-13%	E261,963	-15%
Zone 3	E382,288	E287,842	-25%	E285,730	-25%	E281,967	-26%	E286,048	-25%	E283,039	-26%	E277,483	-27%
Average [large sites]													
Zone 1	E391,696	E286,291	-27%	E283,698	-28%	E279,180	-29%	E284,313	-27%	E280,732	-28%	E274,236	-30%
Zone 2a	E139,843	E88,599	-37%	E86,331	-38%	E82,323	-41%	E86,744	-38%	E83,549	-40%	E77,687	-44%
Zone 2b	E218,252	E151,927	-30%	E149,659	-31%	E145,651	-33%	E150,073	-31%	E146,877	-33%	E141,014	-35%
Zone 3	E394,704	E288,107	-27%	E286,001	-28%	E282,249	-28%	E286,316	-27%	E283,315	-28%	E277,771	-30%
Strategic Sites													
Zone 1	E431,863	E319,653	-26%	E317,526	-26%	E313,825	-27%	E318,066	-26%	E315,146	-27%	E309,858	-28%
Zone 2b	E239,403	E170,758	-29%	E168,895	-29%	E165,610	-31%	E169,267	-29%	E166,659	-30%	E161,882	-32%
Averages [small sites]													
		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m	
Zone 1	E364,724	E277,668	-24%	E274,812	-25%	E269,845	-26%	E275,509	-24%	E271,574	-26%	E264,448	-27%
Zone 2a	E316,181	E246,339	-22%	E244,133	-23%	E240,182	-24%	E244,420	-23%	E241,254	-24%	E235,384	-26%
Zone 2b	E557,217	E445,912	-20%	E443,660	-20%	E439,648	-21%	E443,997	-20%	E440,787	-21%	E434,860	-22%
Zone 3	E617,228	E567,492	-8%	E565,354	-8%	E561,526	-9%	E565,632	-8%	E562,565	-9%	E556,878	-10%
Average [medium sites]													
Zone 1	E368,744	E281,021	-24%	E278,217	-25%	E273,335	-26%	E278,890	-24%	E275,020	-25%	E268,007	-27%
Zone 2a	E136,862	E64,036	-53%	E61,436	-55%	E56,855	-58%	E61,941	-55%	E58,293	-57%	E51,616	-62%
Zone 2b	E307,109	E297,252	-3%	E294,915	-4%	E290,775	-5%	E295,314	-4%	E292,009	-5%	E285,932	-7%
Zone 3	E382,288	E310,594	-19%	E308,365	-19%	E304,393	-20%	E308,699	-19%	E305,522	-20%	E299,654	-22%
Average [large sites]													
Zone 1	E391,696	E304,143	-22%	E301,399	-23%	E296,617	-24%	E302,051	-23%	E298,260	-24%	E291,386	-26%
Zone 2a	E139,843	E96,696	-31%	E94,296	-33%	E90,057	-36%	E94,734	-32%	E91,353	-35%	E85,152	-39%
Zone 2b	E218,252	E163,811	-25%	E161,410	-26%	E157,169	-28%	E161,848	-26%	E158,467	-27%	E152,264	-30%
Zone 3	E394,704	E299,099	-24%	E296,855	-25%	E292,860	-26%	E297,198	-25%	E294,003	-26%	E288,107	-27%
Strategic Sites													
Zone 1	E431,863	E340,952	-21%	E338,703	-22%	E334,788	-22%	E339,274	-21%	E336,185	-22%	E330,592	-23%
Zone 2b	E239,403	E182,894	-24%	E180,923	-24%	E177,447	-26%	E181,316	-24%	E178,557	-25%	E173,503	-28%
Averages [small sites]													
		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m	
Zone 1	E364,724	E311,890	-14%	E308,877	-15%	E303,633	-17%	E309,606	-15%	E305,450	-16%	E297,923	-18%
Zone 2a	E316,181	E264,532	-16%	E262,191	-17%	E257,997	-18%	E262,495	-17%	E259,135	-18%	E252,905	-20%
Zone 2b	E557,217	E468,464	-16%	E466,038	-16%	E461,720	-17%	E466,409	-16%	E462,956	-17%	E456,584	-18%
Zone 3	E617,228	E517,368	-16%	E514,980	-17%	E510,729	-17%	E515,347	-17%	E511,949	-17%	E505,679	-18%
Average [medium sites]													
Zone 1	E368,744	E296,690	-20%	E293,855	-20%	E289,768	-21%	E294,424	-20%	E291,174	-21%	E285,301	-23%
Zone 2a	E136,862	E82,606	-40%	E79,868	-42%	E75,039	-45%	E80,391	-41%	E76,544	-44%	E69,500	-49%
Zone 2b	E307,109	E304,742	-1%	E302,240	-2%	E297,810	-3%	E302,677	-1%	E299,142	-3%	E292,648	-5%
Zone 3	E382,288	E336,140	-12%	E333,780	-13%	E329,573	-14%	E334,131	-13%	E330,765	-13%	E324,549	-15%
Average [large sites]													
Zone 1	E391,696	E327,570	-16%	E324,658	-17%	E319,585	-18%	E325,349	-17%	E321,328	-18%	E314,034	-20%
Zone 2a	E139,843	E106,694	-24%	E104,149	-26%	E99,651	-29%	E104,612	-25%	E101,026	-28%	E94,446	-32%
Zone 2b	E218,252	E176,693	-19%	E174,145	-20%	E169,642	-22%	E174,610	-20%	E171,020	-22%	E164,435	-25%
Zone 3	E394,704	E324,401	-18%	E322,026	-18%	E317,796	-19%	E322,386	-18%	E319,003	-19%	E312,757	-21%
Strategic Sites													
Zone 1	E431,863	E364,313	-16%	E361,925	-16%	E357,770	-17%	E362,532	-16%	E359,253	-17%	E353,316	-18%
Zone 2b	E239,403	E197,048	-18%	E194,956	-19%	E191,267	-20%	E195,373	-18%	E192,445	-20%	E187,082	-22%
Averages [small sites]													
		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m	
Zone 1	E364,724	E337,475	-7%	E334,273	-8%	E328,701	-10%	E335,045	-8%	E330,628	-9%	E322,624	-12%
Zone 2a	E316,181	E284,778	-10%	E282,361	-11%	E278,032	-12%	E282,675	-11%	E279,206	-12%	E272,718	-14%
Zone 2b	E557,217	E505,676	-9%	E503,119	-10%	E498,565	-11%	E503,506	-10%	E499,864	-10%	E493,140	-11%
Zone 3	E617,228	E559,770	-9%	E557,234	-10%	E552,718	-10%	E557,621	-10%	E554,010	-10%	E547,344	-11%
Average [medium sites]													
Zone 1	E368,744	E326,668	-11%	E323,498	-12%	E317,980	-14%	E324,258	-12%	E319,884	-13%	E311,955	-15%
Zone 2a	E136,862	E103,189	-25%	E100,352	-27%	E95,347	-30%	E100,885	-26%	E96,897	-29%	E89,588	-35%
Zone 2b	E307,109	E269,261	-12%	E266,513	-13%	E261,665	-15%	E267,029	-13%	E263,165	-14%	E256,085	-17%
Zone 3	E382,288	E340,168	-11%	E337,613	-12%	E333,068	-13%	E338,011	-12%	E334,378	-13%	E327,677	-14%
Average [large sites]													
Zone 1	E391,696	E352,459	-10%	E349,357	-11%	E343,954	-12%	E350,093	-11%	E345,809	-12%	E338,040	-14%
Zone 2a	E139,843	E114,983	-18%	E112,267	-20%	E107,470	-23%	E112,763	-19%	E108,938	-22%	E101,921	-27%
Zone 2b	E218,252	E189,076	-13%	E186,356	-15%	E181,552	-17%	E186,855	-14%	E183,024	-16%	E175,999	-19%
Zone 3	E394,704	E353,014	-11%	E350,490	-11%	E345,994	-12%	E350,869	-11%	E347,273	-12%	E340,633	-14%
Strategic Sites													
Zone 1	E431,863	E390,833	-10%	E388,289	-10%	E383,861	-11%	E388,935	-10%	E385,442	-11%	E379,115	-12%
Zone 2b	E239,403	E212,554	-11%	E210,325	-12%	E206,395	-14%	E210,770	-12%	E207,649	-13%	E201,935	-16%

Table 39 - H5 Affordable Housing - Option 2 [CUMULATIVE] - GREENFIELD

Base Case		Base Case plus		Base Case plus		Base Case plus		Base Case plus		Base Case plus		Base Case plus	
Policy H5 - Option 1 Policy EN1 Policy EN2 INDEX increased CIL		Policy EN8 Policy H5 - Option 2 Policy H9 Policy H10 M4 (2) - 30% M4 (3) - 2% Policy G4 - 80sq.m Policy G5 (Zone 4 only)		Policy EN8 Policy H5 - Option 2 Policy H9 Policy H10 M4 (2) - 35% M4 (3) - 3% Policy G4 - 80sq.m Policy G5 (Zone 4 only)		Policy EN8 Policy H5 - Option 2 Policy H9 Policy H10 M4 (2) - 40% M4 (3) - 5% Policy G4 - 80sq.m Policy G5 (Zone 4 only)		Policy EN8 Policy H5 - Option 2 Policy H9 Policy H10 M4 (2) - 30% M4 (3) - 2% Policy G4 - 80sq.m Policy G5 (Zone 4 only)		Policy EN8 Policy H5 - Option 2 Policy H9 Policy H10 M4 (2) - 35% M4 (3) - 3% Policy G4 - 80sq.m Policy G5 (Zone 4 only)		Policy EN8 Policy H5 - Option 2 Policy H9 Policy H10 M4 (2) - 40% M4 (3) - 5% Policy G4 - 80sq.m Policy G5 (Zone 4 only)	
		Adaptable				Accessible							
Averages [small sites]													
Zone 1	£364,724	£208,570	-43%	£206,762	-43%	£203,624	-44%	£207,217	-43%	£204,733	-44%	£200,243	-45%
Zone 2a	£316,181	£230,136	-27%	£228,050	-28%	£224,316	-29%	£228,322	-28%	£225,329	-29%	£219,780	-30%
Zone 2b	£557,217	£300,530	-46%	£298,178	-46%	£294,026	-47%	£298,615	-46%	£295,305	-47%	£289,238	-48%
Zone 3	£617,228	£358,855	-42%	£356,596	-42%	£352,603	-43%	£357,004	-42%	£353,820	-43%	£347,976	-44%
Average [medium sites]													
Zone 1	£368,744	£193,578	-48%	£191,416	-48%	£187,662	-49%	£191,958	-48%	£188,986	-49%	£183,613	-50%
Zone 2a	£136,862	£47,497	-65%	£45,020	-67%	£40,659	-70%	£45,509	-67%	£42,037	-69%	£35,689	-74%
Zone 2b	£307,109	£175,763	-43%	£173,331	-44%	£169,055	-45%	£173,818	-43%	£170,415	-45%	£164,194	-47%
Zone 3	£382,288	£234,456	-39%	£232,252	-39%	£228,345	-40%	£232,627	-39%	£229,508	-40%	£223,772	-41%
Average [large sites]													
Zone 1	£391,696	£213,575	-45%	£210,882	-46%	£206,196	-47%	£211,553	-46%	£207,843	-47%	£201,383	-49%
Zone 2a	£139,843	£47,689	-66%	£45,342	-68%	£41,208	-71%	£45,804	-67%	£42,513	-70%	£36,494	-74%
Zone 2b	£218,252	£106,338	-51%	£103,963	-52%	£99,760	-54%	£104,431	-52%	£101,094	-54%	£94,934	-57%
Zone 3	£394,704	£238,535	-40%	£236,344	-40%	£232,458	-41%	£236,710	-40%	£233,607	-41%	£227,897	-42%
Strategic Sites													
Zone 1	£431,863	£254,986	-41%	£252,793	-41%	£248,988	-42%	£253,375	-41%	£250,377	-42%	£244,962	-43%
Zone 2b	£239,403	£129,518	-46%	£127,588	-47%	£124,198	-48%	£128,002	-47%	£125,315	-48%	£120,410	-50%
Averages [small sites]													
		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m	
Zone 1	£364,724	£217,069	-40%	£214,152	-41%	£209,089	-43%	£214,886	-41%	£210,878	-42%	£203,632	-44%
Zone 2a	£316,181	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£557,217	£317,854	-43%	£315,359	-43%	£310,954	-44%	£315,825	-43%	£312,315	-44%	£306,368	-45%
Zone 3	£617,228	£392,251	-36%	£389,875	-37%	£385,672	-38%	£390,298	-37%	£386,946	-37%	£380,790	-38%
Average [medium sites]													
Zone 1	£368,744	£218,083	-41%	£215,807	-41%	£211,853	-43%	£216,374	-41%	£213,243	-42%	£207,580	-44%
Zone 2a	£136,862	£23,271	-83%	£20,583	-85%	£15,865	-88%	£21,141	-85%	£17,389	-87%	£10,542	-92%
Zone 2b	£307,109	£177,735	-42%	£175,148	-43%	£170,601	-44%	£175,672	-43%	£172,054	-44%	£165,445	-46%
Zone 3	£382,288	£257,208	-33%	£254,887	-33%	£250,771	-34%	£255,277	-33%	£251,991	-34%	£245,943	-36%
Average [large sites]													
Zone 1	£391,696	£231,238	-41%	£228,395	-42%	£223,442	-43%	£229,102	-42%	£225,181	-43%	£218,213	-44%
Zone 2a	£139,843	£51,803	-63%	£49,316	-65%	£44,939	-68%	£49,807	-64%	£46,322	-67%	£39,949	-71%
Zone 2b	£218,252	£116,960	-46%	£114,454	-48%	£110,035	-50%	£114,948	-47%	£111,429	-49%	£104,995	-52%
Zone 3	£394,704	£247,826	-37%	£245,497	-38%	£241,368	-39%	£245,891	-38%	£242,595	-39%	£236,532	-40%
Strategic Sites													
Zone 1	£431,863	£272,172	-37%	£269,852	-38%	£265,827	-38%	£270,468	-37%	£267,297	-38%	£261,568	-39%
Zone 2b	£239,403	£139,897	-42%	£137,856	-42%	£134,271	-44%	£138,294	-42%	£135,452	-43%	£130,265	-46%
Averages [small sites]													
		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m	
Zone 1	£364,724	£231,645	-36%	£229,610	-37%	£226,080	-38%	£230,125	-37%	£227,330	-38%	£222,280	-39%
Zone 2a	£316,181	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£557,217	£351,246	-37%	£348,616	-37%	£343,970	-38%	£349,100	-37%	£345,396	-38%	£338,604	-39%
Zone 3	£617,228	£429,747	-30%	£427,240	-31%	£422,802	-31%	£427,680	-31%	£424,140	-31%	£417,635	-32%
Average [medium sites]													
Zone 1	£368,744	£226,760	-39%	£223,848	-39%	£219,641	-40%	£224,465	-39%	£221,123	-40%	£215,099	-42%
Zone 2a	£136,862	£41,841	-69%	£39,015	-71%	£34,050	-75%	£39,591	-71%	£35,641	-74%	£28,425	-79%
Zone 2b	£307,109	£202,035	-34%	£199,314	-35%	£194,512	-37%	£199,861	-35%	£196,039	-36%	£189,054	-38%
Zone 3	£382,288	£282,754	-26%	£280,302	-27%	£275,951	-28%	£280,709	-27%	£277,234	-27%	£270,838	-29%
Average [large sites]													
Zone 1	£391,696	£247,617	-37%	£244,608	-38%	£239,365	-39%	£245,359	-37%	£241,207	-38%	£233,680	-40%
Zone 2a	£139,843	£57,818	-59%	£55,178	-61%	£50,532	-64%	£55,699	-60%	£52,000	-63%	£45,235	-68%
Zone 2b	£218,252	£126,290	-42%	£123,652	-43%	£119,006	-45%	£124,172	-43%	£120,475	-45%	£113,655	-48%
Zone 3	£394,704	£273,128	-31%	£270,667	-31%	£266,303	-33%	£271,079	-31%	£267,594	-32%	£261,182	-34%
Strategic Sites													
Zone 1	£431,863	£291,297	-33%	£288,835	-33%	£284,562	-34%	£289,488	-33%	£286,122	-34%	£280,041	-35%
Zone 2b	£239,403	£151,146	-37%	£148,981	-38%	£145,175	-39%	£149,445	-38%	£146,429	-39%	£140,923	-41%
Averages [small sites]													
		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m	
Zone 1	£364,724	£282,823	-22%	£280,690	-23%	£276,982	-24%	£281,217	-23%	£278,280	-24%	£272,967	-25%
Zone 2a	£316,181	£15,107	-95%	£12,038	-96%	£6,655	-98%	£12,687	-96%	£8,408	-97%	£606	-100%
Zone 2b	£557,217	£388,606	-30%	£385,853	-31%	£380,988	-32%	£386,351	-31%	£382,471	-31%	£375,351	-33%
Zone 3	£617,228	£472,150	-24%	£469,494	-24%	£464,791	-25%	£469,954	-24%	£466,200	-24%	£459,301	-26%
Average [medium sites]													
Zone 1	£368,744	£255,094	-31%	£252,525	-32%	£248,061	-33%	£253,163	-31%	£249,628	-32%	£243,233	-34%
Zone 2a	£136,862	£62,841	-54%	£59,859	-56%	£54,613	-60%	£60,455	-56%	£56,280	-59%	£48,649	-64%
Zone 2b	£307,109	£205,157	-33%	£202,247	-34%	£197,132	-36%	£202,837	-34%	£198,767	-35%	£191,308	-38%
Zone 3	£382,288	£286,782	-25%	£284,136	-26%	£279,447	-27%	£284,590	-26%	£280,847	-27%	£273,966	-28%
Average [large sites]													
Zone 1	£391,696	£268,343	-31%	£265,144	-32%	£259,569	-34%	£265,939	-32%	£261,530	-33%	£253,521	-35%
Zone 2a	£139,843	£66,107	-53%	£63,297	-55%	£58,350	-58%	£63,850	-54%	£59,912	-57%	£52,709	-62%
Zone 2b	£218,252	£134,149	-39%	£131,332	-40%	£126,342	-42%	£131,890	-40%	£127,928	-41%	£120,633	-45%
Zone 3	£394,704	£290,198	-26%	£287,568	-27%	£282,904	-28%	£288,012	-27%	£284,289	-28%	£277,439	-30%
Strategic Sites													
Zone 1	£431,863	£313,543	-27%	£310,920	-28%	£306,369	-29%	£311,616	-28%	£308,030	-29%	£301,552	-30%
Zone 2b	£239,403	£163,507	-32%	£161,199	-33%	£157,144	-34%	£161,694	-32%	£158,480	-34%	£152,612	-36%

Table 40 - H5 Affordable Housing - Option 3 [CUMULATIVE] - GREENFIELD													
Base Case		Base Case plus		Base Case plus		Base Case plus		Base Case plus		Base Case plus		Base Case plus	
Policy H5 - Option 1		Policy EN8		Policy EN8		Policy EN8		Policy EN8		Policy EN8		Policy EN8	
Policy EN1		Policy H5 - Option 3		Policy H5 - Option 3		Policy H5 - Option 3		Policy H5 - Option 3		Policy H5 - Option 3		Policy H5 - Option 3	
Policy EN2		Policy H9		Policy H9		Policy H9		Policy H9		Policy H9		Policy H9	
INDEX increased CIL		Policy H10		Policy H10		Policy H10		Policy H10		Policy H10		Policy H10	
		M4 (2) - 30%		M4 (2) - 35%		M4 (2) - 40%		M4 (2) - 30%		M4 (2) - 35%		M4 (2) - 40%	
		M4 (3) - 2%		M4 (3) - 3%		M4 (3) - 5%		M4 (3) - 2%		M4 (3) - 3%		M4 (3) - 5%	
		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m	
		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)	
		Adaptable				Accessible							
Averages [small sites]													
Zone 1	E364,724	E298,968	-18%	E296,341	-19%	E291,760	-20%	E296,956	-19%	E293,322	-20%	E286,729	-21%
Zone 2a	E316,181	E230,136	-27%	E228,050	-28%	E224,316	-29%	E228,322	-28%	E225,329	-29%	E219,780	-30%
Zone 2b	E557,217	E308,452	-45%	E306,123	-45%	E302,007	-46%	E306,546	-45%	E303,264	-46%	E297,242	-47%
Zone 3	E617,228	E348,416	-44%	E346,157	-44%	E342,164	-45%	E346,565	-44%	E343,381	-44%	E337,536	-45%
Average [medium sites]													
Zone 1	E368,744	E285,343	-23%	E282,741	-23%	E278,202	-25%	E283,347	-23%	E279,747	-24%	E273,213	-26%
Zone 2a	E136,862	E84,149	-39%	E81,782	-40%	E77,558	-43%	E82,218	-40%	E78,851	-42%	E72,673	-47%
Zone 2b	E307,109	E199,386	-35%	E197,051	-36%	E192,918	-37%	E197,497	-36%	E194,211	-37%	E188,159	-39%
Zone 3	E382,288	E224,500	-41%	E222,296	-42%	E218,389	-43%	E222,670	-42%	E219,552	-43%	E213,815	-44%
Average [large sites]													
Zone 1	E391,696	E325,258	-17%	E322,741	-18%	E318,343	-19%	E323,310	-17%	E319,819	-18%	E313,473	-20%
Zone 2a	E139,843	E77,284	-45%	E75,016	-46%	E71,009	-49%	E75,430	-46%	E72,235	-48%	E66,373	-53%
Zone 2b	E218,252	E141,246	-35%	E138,978	-36%	E134,970	-38%	E139,392	-36%	E136,196	-38%	E130,333	-40%
Zone 3	E394,704	E227,589	-42%	E225,398	-43%	E221,511	-44%	E225,764	-43%	E222,661	-44%	E216,951	-45%
Strategic Sites													
Zone 1	E431,863	E359,793	-17%	E357,732	-17%	E354,135	-18%	E358,230	-17%	E355,388	-18%	E350,227	-19%
Zone 2b	E239,403	E160,424	-33%	E158,560	-34%	E155,273	-35%	E158,932	-34%	E156,323	-35%	E151,544	-37%
Averages [small sites]													
		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m	
Zone 1	E364,724	E310,980	-15%	E308,196	-15%	E303,343	-17%	E308,849	-15%	E305,000	-16%	E298,016	-18%
Zone 2a	E316,181	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E557,217	E327,634	-41%	E325,162	-42%	E320,794	-42%	E325,614	-42%	E322,132	-42%	E315,745	-43%
Zone 3	E617,228	E381,811	-38%	E379,435	-39%	E375,233	-39%	E379,859	-38%	E376,506	-39%	E370,351	-40%
Average [medium sites]													
Zone 1	E368,744	E320,279	-13%	E317,545	-14%	E312,772	-15%	E318,175	-14%	E314,389	-15%	E307,512	-17%
Zone 2a	E136,862	E52,977	-61%	E50,377	-63%	E45,796	-67%	E50,882	-63%	E47,234	-65%	E40,558	-70%
Zone 2b	E307,109	E202,768	-34%	E200,261	-35%	E195,845	-36%	E200,748	-35%	E197,231	-36%	E190,794	-38%
Zone 3	E382,288	E247,252	-35%	E244,931	-36%	E240,815	-37%	E245,321	-36%	E242,034	-37%	E235,987	-38%
Average [large sites]													
Zone 1	E391,696	E351,051	-10%	E348,392	-11%	E343,746	-12%	E348,991	-11%	E345,303	-12%	E338,598	-14%
Zone 2a	E139,843	E84,458	-40%	E82,059	-41%	E77,819	-44%	E82,496	-41%	E79,116	-43%	E72,914	-48%
Zone 2b	E218,252	E152,191	-30%	E149,791	-31%	E145,550	-33%	E150,229	-31%	E146,847	-33%	E140,644	-36%
Zone 3	E394,704	E236,880	-40%	E234,551	-41%	E230,422	-42%	E234,945	-40%	E231,649	-41%	E225,586	-43%
Strategic Sites													
Zone 1	E431,863	E383,166	-11%	E380,986	-12%	E377,180	-13%	E381,513	-12%	E378,506	-12%	E373,047	-14%
Zone 2b	E239,403	E172,548	-28%	E170,576	-29%	E167,101	-30%	E170,970	-29%	E168,210	-30%	E163,157	-32%
Averages [small sites]													
		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m	
Zone 1	E364,724	E313,934	-14%	E310,945	-15%	E305,739	-16%	E311,659	-15%	E307,532	-16%	E300,051	-18%
Zone 2a	E316,181	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E557,217	E361,026	-35%	E358,419	-36%	E353,809	-37%	E358,889	-36%	E355,213	-36%	E348,467	-37%
Zone 3	E617,228	E419,308	-32%	E416,801	-32%	E412,363	-33%	E417,241	-32%	E413,700	-33%	E407,196	-34%
Average [medium sites]													
Zone 1	E368,744	E338,720	-8%	E335,817	-9%	E330,752	-10%	E336,487	-9%	E332,467	-10%	E325,169	-12%
Zone 2a	E136,862	E71,547	-48%	E68,809	-50%	E63,980	-53%	E69,332	-49%	E65,485	-52%	E58,441	-57%
Zone 2b	E307,109	E230,467	-25%	E227,868	-26%	E223,281	-27%	E228,364	-26%	E224,714	-27%	E217,957	-29%
Zone 3	E382,288	E272,798	-29%	E270,346	-29%	E265,995	-30%	E270,753	-29%	E267,278	-30%	E260,881	-32%
Average [large sites]													
Zone 1	E391,696	E373,253	-5%	E370,429	-5%	E365,493	-7%	E371,066	-5%	E367,149	-6%	E360,026	-8%
Zone 2a	E139,843	E90,473	-35%	E87,921	-37%	E83,411	-40%	E88,388	-37%	E84,794	-39%	E78,200	-44%
Zone 2b	E218,252	E162,897	-25%	E160,344	-27%	E155,834	-29%	E160,812	-26%	E157,217	-28%	E150,622	-31%
Zone 3	E394,704	E262,182	-34%	E259,721	-34%	E255,357	-35%	E260,133	-34%	E256,648	-35%	E250,236	-37%
Strategic Sites													
Zone 1	E431,863	E409,265	-5%	E406,950	-6%	E402,911	-7%	E407,510	-6%	E404,318	-6%	E398,524	-8%
Zone 2b	E239,403	E185,977	-22%	E183,885	-23%	E180,197	-25%	E184,303	-23%	E181,374	-24%	E176,011	-26%
Averages [small sites]													
		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m	
Zone 1	E364,724	E377,834	4%	E374,693	3%	E369,217	1%	E375,427	3%	E371,084	2%	E363,200	0%
Zone 2a	E316,181	E15,107	-95%	E12,038	-96%	E6,655	-98%	E12,687	-96%	E8,408	-97%	E606	-100%
Zone 2b	E557,217	E398,315	-29%	E395,605	-29%	E390,811	-30%	E396,085	-29%	E392,261	-30%	E385,214	-31%
Zone 3	E617,228	E461,710	-25%	E459,055	-26%	E454,351	-26%	E459,514	-26%	E455,761	-26%	E448,861	-27%
Average [medium sites]													
Zone 1	E368,744	E363,554	-1%	E360,455	-2%	E355,047	-4%	E361,172	-2%	E356,882	-3%	E349,092	-5%
Zone 2a	E136,862	E92,354	-33%	E89,518	-35%	E84,513	-38%	E90,050	-34%	E86,062	-37%	E78,665	-43%
Zone 2b	E307,109	E251,904	-18%	E249,125	-19%	E244,223	-20%	E249,650	-19%	E245,745	-20%	E238,589	-22%
Zone 3	E382,288	E273,162	-29%	E270,516	-29%	E265,827	-30%	E270,970	-29%	E267,227	-30%	E260,346	-32%
Average [large sites]													
Zone 1	E391,696	E403,778	3%	E400,772	2%	E395,518	1%	E401,450	2%	E397,279	1%	E389,697	-1%
Zone 2a	E139,843	E101,823	-27%	E99,107	-29%	E94,310	-33%	E99,603	-29%	E95,778	-32%	E88,761	-37%
Zone 2b	E218,252	E175,654	-20%	E172,935	-21%	E168,130	-23%	E173,433	-21%	E169,603	-22%	E162,577	-26%
Zone 3	E394,704	E279,251	-29%	E276,621	-30%	E271,958	-31%	E277,065	-30%	E273,342	-31%	E266,493	-32%
Strategic Sites													
Zone 1	E431,863	E439,150	2%	E436,684	1%	E432,381	0%	E437,280	1%	E433,880	0%	E427,707	-1%
Zone 2b	E239,403	E200,700	-16%	E198,471	-17%	E194,540	-19%	E198,916	-17%	E195,795	-18%	E190,080	-21%

Table 41 - H5 Affordable Housing - Option 4 [CUMULATIVE] - GREENFIELD																
Base Case		Base Case plus			Base Case plus			Base Case plus			Base Case plus			Base Case plus		
Policy H5 - Option 1		Policy EN8			Policy EN8			Policy EN8			Policy EN8			Policy EN8		
Policy EN1		Policy H5 - Option 4			Policy H5 - Option 4			Policy H5 - Option 4			Policy H5 - Option 4			Policy H5 - Option 4		
Policy EN2		Policy H9			Policy H9			Policy H9			Policy H9			Policy H9		
INDEX increased CIL		Policy H10			Policy H10			Policy H10			Policy H10			Policy H10		
		M4 (2) - 30%			M4 (2) - 35%			M4 (2) - 40%			M4 (2) - 30%			M4 (2) - 35%		
		M4 (3) - 2%			M4 (3) - 3%			M4 (3) - 5%			M4 (3) - 2%			M4 (3) - 3%		
		Policy G4 - 80sq.m			Policy G4 - 80sq.m			Policy G4 - 80sq.m			Policy G4 - 80sq.m			Policy G4 - 80sq.m		
		Policy G5 (Zone 4 only)			Policy G5 (Zone 4 only)			Policy G5 (Zone 4 only)			Policy G5 (Zone 4 only)			Policy G5 (Zone 4 only)		
		Adaptable						Accessible								
Averages [small sites]																
Zone 1	E364,724	E435,058	19%	E432,625	19%	E428,350	17%	E433,122	19%	E429,720	18%	E423,509	16%			
Zone 2a	E316,181	E230,136	-27%	E228,050	-28%	E224,316	-29%	E228,322	-28%	E225,329	-29%	E219,780	-30%			
Zone 2b	E557,217	E341,922	-39%	E339,709	-39%	E335,783	-40%	E340,079	-39%	E336,945	-40%	E331,125	-41%			
Zone 3	E617,228	E406,547	-34%	E404,407	-34%	E400,601	-35%	E404,742	-34%	E401,700	-35%	E396,090	-36%			
Average [medium sites]																
Zone 1	E368,744	E414,675	12%	E412,283	12%	E408,076	11%	E412,766	12%	E409,419	11%	E403,303	9%			
Zone 2a	E136,862	E113,252	-17%	E110,996	-19%	E106,993	-22%	E111,371	-19%	E108,174	-21%	E102,290	-25%			
Zone 2b	E307,109	E239,843	-22%	E237,619	-23%	E233,681	-24%	E238,005	-23%	E234,863	-24%	E229,087	-25%			
Zone 3	E382,288	E260,602	-32%	E258,490	-32%	E254,727	-33%	E258,808	-32%	E255,799	-33%	E250,243	-35%			
Average [large sites]																
Zone 1	E391,696	E435,771	11%	E433,419	11%	E429,282	10%	E433,887	11%	E430,594	10%	E424,573	8%			
Zone 2a	E139,843	E104,553	-25%	E102,365	-27%	E98,483	-30%	E102,730	-27%	E99,630	-29%	E93,925	-33%			
Zone 2b	E218,252	E173,803	-20%	E171,618	-21%	E167,741	-23%	E171,981	-21%	E168,885	-23%	E163,185	-25%			
Zone 3	E394,704	E261,112	-34%	E259,006	-34%	E255,254	-35%	E259,321	-34%	E256,320	-35%	E250,776	-36%			
Strategic Sites																
Zone 1	E431,863	E460,788	7%	E458,860	6%	E455,470	5%	E459,273	6%	E456,587	6%	E451,683	5%			
Zone 2b	E239,403	E189,538	-21%	E187,741	-22%	E184,560	-23%	E188,071	-21%	E185,540	-22%	E180,891	-24%			
Averages [small sites]																
		Policy G4 - 60sq.m			Policy G4 - 60sq.m			Policy G4 - 60sq.m			Policy G4 - 60sq.m			Policy G4 - 60sq.m		
Zone 1	E364,724	E446,914	23%	E444,343	22%	E439,827	21%	E444,874	22%	E441,282	21%	E434,727	19%			
Zone 2a	E316,181	E34,950	-89%	E32,349	-90%	E27,768	-91%	E32,854	-90%	E29,206	-91%	E22,530	-93%			
Zone 2b	E557,217	E368,642	-34%	E366,312	-34%	E362,175	-35%	E366,696	-34%	E363,393	-35%	E357,310	-36%			
Zone 3	E617,228	E439,942	-29%	E437,685	-29%	E433,670	-30%	E438,036	-29%	E434,826	-30%	E428,905	-31%			
Average [medium sites]																
Zone 1	E368,744	E455,648	24%	E453,132	23%	E448,706	22%	E453,634	23%	E450,111	22%	E443,670	20%			
Zone 2a	E136,862	E82,683	-40%	E80,170	-41%	E75,726	-45%	E80,622	-41%	E77,078	-44%	E70,573	-48%			
Zone 2b	E307,109	E256,139	-17%	E253,790	-17%	E249,630	-19%	E254,197	-17%	E250,877	-18%	E244,774	-20%			
Zone 3	E382,288	E283,354	-26%	E281,125	-26%	E277,153	-28%	E281,459	-26%	E278,282	-27%	E272,415	-29%			
Average [large sites]																
Zone 1	E391,696	E467,251	19%	E464,767	19%	E460,395	18%	E465,260	19%	E461,781	18%	E455,418	16%			
Zone 2a	E139,843	E114,206	-18%	E111,894	-20%	E107,791	-23%	E112,278	-20%	E109,002	-22%	E102,972	-26%			
Zone 2b	E218,252	E184,748	-15%	E182,431	-16%	E178,321	-18%	E182,818	-16%	E179,536	-18%	E173,496	-21%			
Zone 3	E394,704	E270,403	-31%	E268,159	-32%	E264,164	-33%	E268,502	-32%	E265,307	-33%	E259,411	-34%			
Strategic Sites																
Zone 1	E431,863	E489,883	13%	E487,842	13%	E484,257	12%	E488,280	13%	E485,438	12%	E480,250	11%			
Zone 2b	E239,403	E203,205	-15%	E201,304	-16%	E197,939	-17%	E201,653	-16%	E198,976	-17%	E194,059	-19%			
Averages [small sites]																
		Policy G4 - 40sq.m			Policy G4 - 40sq.m			Policy G4 - 40sq.m			Policy G4 - 40sq.m			Policy G4 - 40sq.m		
Zone 1	E364,724	E473,507	30%	E470,780	29%	E465,990	28%	E471,343	29%	E467,533	28%	E460,578	26%			
Zone 2a	E316,181	E53,520	-83%	E50,781	-84%	E45,953	-85%	E51,304	-84%	E47,458	-85%	E40,414	-87%			
Zone 2b	E557,217	E401,544	-28%	E399,080	-28%	E394,706	-29%	E399,482	-28%	E395,988	-29%	E389,553	-30%			
Zone 3	E617,228	E477,438	-23%	E475,050	-23%	E470,800	-24%	E475,418	-23%	E472,020	-24%	E465,749	-25%			
Average [medium sites]																
Zone 1	E368,744	E473,952	29%	E471,268	28%	E466,550	27%	E471,809	28%	E468,054	27%	E461,192	25%			
Zone 2a	E136,862	E100,884	-26%	E98,286	-28%	E93,690	-32%	E98,747	-28%	E95,080	-31%	E88,347	-35%			
Zone 2b	E307,109	E283,737	-8%	E281,256	-8%	E276,861	-10%	E281,680	-8%	E278,172	-9%	E271,720	-12%			
Zone 3	E382,288	E308,900	-19%	E306,540	-20%	E302,333	-21%	E306,891	-20%	E303,526	-21%	E297,309	-22%			
Average [large sites]																
Zone 1	E391,696	E498,224	27%	E495,587	27%	E490,946	25%	E496,111	27%	E492,417	26%	E485,662	24%			
Zone 2a	E139,843	E122,700	-12%	E120,242	-14%	E115,881	-17%	E120,652	-14%	E117,170	-16%	E110,762	-21%			
Zone 2b	E218,252	E200,211	-8%	E197,754	-9%	E193,396	-11%	E198,164	-9%	E194,683	-11%	E188,278	-14%			
Zone 3	E394,704	E295,705	-25%	E293,330	-26%	E289,100	-27%	E293,690	-26%	E290,307	-26%	E284,061	-28%			
Strategic Sites																
Zone 1	E431,863	E522,478	21%	E520,312	20%	E516,506	20%	E520,776	21%	E517,760	20%	E512,253	19%			
Zone 2b	E239,403	E218,333	-9%	E216,315	-10%	E212,743	-11%	E216,685	-9%	E213,844	-11%	E208,625	-13%			
Averages [small sites]																
		Policy G4 - 20sq.m			Policy G4 - 20sq.m			Policy G4 - 20sq.m			Policy G4 - 20sq.m			Policy G4 - 20sq.m		
Zone 1	E364,724	E537,149	47%	E534,271	46%	E529,212	45%	E534,853	47%	E530,828	46%	E523,474	44%			
Zone 2a	E316,181	E74,520	-76%	E71,625	-77%	E66,516	-79%	E72,168	-77%	E68,097	-78%	E60,637	-81%			
Zone 2b	E557,217	E438,610	-21%	E436,025	-22%	E431,432	-23%	E436,442	-22%	E432,772	-22%	E426,011	-24%			
Zone 3	E617,228	E519,841	-16%	E517,305	-16%	E512,788	-17%	E517,692	-16%	E514,080	-17%	E507,415	-18%			
Average [medium sites]																
Zone 1	E368,744	E507,406	38%	E504,540	37%	E499,502	35%	E505,120	37%	E501,111	36%	E493,787	34%			
Zone 2a	E136,862	E121,457	-11%	E118,706	-13%	E113,836	-17%	E119,187	-13%	E115,301	-16%	E108,160	-21%			
Zone 2b	E307,109	E305,173	-1%	E302,535	-1%	E297,859	-3%	E302,984	-1%	E299,251	-3%	E292,386	-5%			
Zone 3	E382,288	E309,264	-19%	E306,710	-20%	E302,165	-21%	E307,108	-20%	E303,475	-21%	E296,773	-22%			
Average [large sites]																
Zone 1	E391,696	E535,498	37%	E532,690	36%	E527,748	35%	E533,247	36%	E529,313	35%	E522,120	33%			
Zone 2a	E139,843	E136,528	-2%	E133,915	-4%	E129,277	-8%	E134,349	-4%	E130,645	-7%	E123,828	-11%			
Zone 2b	E218,252	E214,699	-2%	E212,079	-3%	E207,431	-5%	E212,517	-3%	E208,806	-4%	E201,976	-7%			
Zone 3	E394,704	E321,156	-19%	E318,632	-19%	E314,136	-20%	E319,012	-19%	E315,416	-20%	E308,775	-22%			
Strategic Sites																
Zone 1	E431,863	E559,598	30%	E557,291	29%	E553,236	28%	E557,786	29%	E554,572	28%	E548,705	27%			
Zone 2b	E239,403	E235,253	-2%	E233,103	-3%	E229,297	-4%	E233,498	-2%	E230,471	-4%	E224,909	-6%			

Table 42 - H5 Affordable Housing - Option 1 [CUMULATIVE] - BROWNFIELD													
Base Case		Base Case plus		Base Case plus		Base Case plus		Base Case plus		Base Case plus		Base Case plus	
Policy H5 - Option 1		Policy EN8		Policy EN8		Policy EN8		Policy EN8		Policy EN8		Policy EN8	
Policy EN1		Policy H5 - Option 1		Policy H5 - Option 1		Policy H5 - Option 1		Policy H5 - Option 1		Policy H5 - Option 1		Policy H5 - Option 1	
Policy EN2		Policy H9		Policy H9		Policy H9		Policy H9		Policy H9		Policy H9	
INDEX increased CIL		Policy H10		Policy H10		Policy H10		Policy H10		Policy H10		Policy H10	
		M4 (2) - 30%		M4 (2) - 35%		M4 (2) - 40%		M4 (2) - 30%		M4 (2) - 35%		M4 (2) - 40%	
		M4 (3) - 2%		M4 (3) - 3%		M4 (3) - 5%		M4 (3) - 2%		M4 (3) - 3%		M4 (3) - 5%	
		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m	
		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)	
		Adaptable				Accessible							
Averages [small sites]													
Zone 1	E268,797	E154,524	-43%	E152,740	-43%	E149,639	-44%	E153,181	-43%	E150,725	-44%	E146,282	-46%
Zone 2a	E193,531	E110,845	-43%	E108,716	-44%	E104,904	-46%	E108,994	-44%	E105,939	-45%	E100,275	-48%
Zone 2b	E438,452	E379,306	-13%	E377,770	-14%	E375,020	-14%	E377,970	-14%	E375,766	-14%	E371,680	-15%
Zone 3	E497,098	E419,601	-16%	E417,580	-16%	E413,962	-17%	E417,843	-16%	E414,944	-17%	E409,567	-18%
Average [medium sites]													
Zone 1	E253,396	E173,031	-32%	E170,946	-33%	E167,314	-34%	E171,442	-32%	E168,562	-33%	E163,340	-36%
Zone 2a	E11,423	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E194,296	E182,703	-6%	E181,627	-7%	E179,713	-8%	E181,799	-6%	E180,270	-7%	E177,451	-9%
Zone 3	E262,157	E173,347	-34%	E171,234	-35%	E167,471	-36%	E171,553	-35%	E168,544	-36%	E162,987	-38%
Average [large sites]													
Zone 1	E273,423	E179,104	-34%	E176,882	-35%	E173,010	-37%	E177,410	-35%	E174,341	-36%	E168,775	-38%
Zone 2a	E19,712	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E103,887	E66,842	-36%	E66,085	-36%	E64,748	-38%	E66,223	-36%	E65,158	-37%	E63,202	-39%
Zone 3	E274,573	E173,612	-37%	E171,506	-38%	E167,754	-39%	E171,821	-37%	E168,819	-39%	E163,276	-41%
Averages [small sites]		Policy G4 - 60sq.m											
Zone 1	E268,797	E194,051	-28%	E192,189	-29%	E188,949	-30%	E192,641	-28%	E190,073	-29%	E185,422	-31%
Zone 2a	E193,531	E126,153	-35%	E123,900	-36%	E119,868	-38%	E124,194	-36%	E120,962	-37%	E114,971	-41%
Zone 2b	E438,452	E390,537	-11%	E388,962	-11%	E386,142	-12%	E389,167	-11%	E386,907	-12%	E382,717	-13%
Zone 3	E497,098	E451,827	-9%	E449,689	-10%	E445,862	-10%	E449,968	-9%	E446,900	-10%	E441,213	-11%
Average [medium sites]													
Zone 1	E253,396	E176,489	-30%	E174,269	-31%	E170,403	-33%	E174,801	-31%	E171,738	-32%	E166,185	-34%
Zone 2a	E11,423	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E194,296	E200,373	3%	E199,238	3%	E197,220	2%	E199,417	3%	E197,804	2%	E194,830	0%
Zone 3	E262,157	E194,929	-26%	E192,700	-26%	E188,728	-28%	E193,034	-26%	E189,857	-28%	E183,990	-30%
Average [large sites]													
Zone 1	E273,423	E194,633	-29%	E192,281	-30%	E188,182	-31%	E192,840	-29%	E189,591	-31%	E183,699	-33%
Zone 2a	E19,712	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E103,887	E74,416	-28%	E73,617	-29%	E72,205	-30%	E73,762	-29%	E72,636	-30%	E70,570	-32%
Zone 3	E274,573	E183,434	-33%	E181,190	-34%	E177,195	-35%	E181,533	-34%	E178,339	-35%	E172,442	-37%
Averages [small sites]		Policy G4 - 40sq.m											
Zone 1	E268,797	E216,149	-20%	E214,175	-20%	E210,741	-22%	E214,652	-20%	E211,931	-21%	E207,001	-23%
Zone 2a	E193,531	E143,340	-26%	E140,949	-27%	E136,669	-29%	E141,260	-27%	E137,830	-29%	E131,471	-32%
Zone 2b	E438,452	E402,999	-8%	E401,380	-8%	E398,482	-9%	E401,591	-8%	E399,268	-9%	E394,962	-10%
Zone 3	E497,098	E400,390	-19%	E398,002	-20%	E393,752	-21%	E398,370	-20%	E394,972	-21%	E388,701	-22%
Average [medium sites]													
Zone 1	E253,396	E202,619	-20%	E200,272	-21%	E196,186	-23%	E200,832	-21%	E197,592	-22%	E191,719	-24%
Zone 2a	E11,423	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E194,296	E207,894	7%	E206,677	6%	E204,516	5%	E206,875	6%	E205,148	6%	E201,968	4%
Zone 3	E262,157	E219,163	-16%	E216,802	-17%	E212,595	-19%	E217,153	-17%	E213,788	-18%	E207,571	-21%
Average [large sites]													
Zone 1	E273,423	E216,217	-21%	E213,721	-22%	E209,374	-23%	E214,314	-22%	E210,868	-23%	E204,617	-25%
Zone 2a	E19,712	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E103,887	E81,952	-21%	E81,104	-22%	E79,605	-23%	E81,258	-22%	E80,063	-23%	E77,871	-25%
Zone 3	E274,573	E207,423	-24%	E205,048	-25%	E200,818	-27%	E205,408	-25%	E202,025	-26%	E195,780	-29%
Averages [small sites]		Policy G4 - 20sq.m											
Zone 1	E268,797	E228,023	-15%	E225,913	-16%	E222,243	-17%	E226,426	-16%	E223,518	-17%	E218,251	-19%
Zone 2a	E193,531	E162,775	-16%	E160,229	-17%	E155,668	-20%	E160,560	-17%	E156,906	-19%	E150,130	-22%
Zone 2b	E438,452	E416,933	-5%	E415,265	-5%	E412,279	-6%	E415,483	-5%	E413,089	-6%	E408,651	-7%
Zone 3	E497,098	E441,308	-11%	E438,771	-12%	E434,255	-13%	E439,158	-12%	E435,547	-12%	E428,882	-14%
Average [medium sites]													
Zone 1	E253,396	E223,776	-12%	E221,276	-13%	E216,921	-14%	E221,872	-12%	E218,420	-14%	E212,162	-16%
Zone 2a	E11,423	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E194,296	E163,704	-16%	E162,315	-16%	E159,837	-18%	E162,582	-16%	E160,614	-17%	E156,987	-19%
Zone 3	E262,157	E221,705	-15%	E219,151	-16%	E214,606	-18%	E219,549	-16%	E215,916	-18%	E209,214	-20%
Average [large sites]													
Zone 1	E273,423	E238,405	-13%	E235,747	-14%	E231,116	-15%	E236,379	-14%	E232,707	-15%	E226,049	-17%
Zone 2a	E19,712	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E103,887	E89,832	-14%	E88,927	-14%	E87,329	-16%	E89,092	-14%	E87,818	-15%	E85,480	-18%
Zone 3	E274,573	E234,551	-15%	E232,027	-15%	E227,531	-17%	E232,407	-15%	E228,811	-17%	E222,170	-19%
CITY CENTRE													
Averages [small sites]													
Zone 4	E1,593,694	E1,478,934	-7%	E1,462,446	-8%	E1,434,884	-10%	E1,471,883	-8%	E1,451,870	-9%	E1,417,257	-11%
Average [medium sites]													
Zone 4	E1,253,172	E1,163,371	-7%	E1,147,012	-8%	E1,119,685	-11%	E1,156,872	-8%	E1,137,264	-9%	E1,103,438	-12%
Average [large sites]													
Zone 4	E877,777	E806,565	-8%	E793,719	-10%	E772,263	-12%	E801,528	-9%	E786,164	-10%	E759,671	-13%

Table 43 - H5 Affordable Housing - Option 2 [CUMULATIVE] - BROWNFIELD													
Base Case		Base Case plus		Base Case plus		Base Case plus		Base Case plus		Base Case plus		Base Case plus	
Policy H5 - Option 1		Policy EN8		Policy EN8		Policy EN8		Policy EN8		Policy EN8		Policy EN8	
Policy EN1		Policy H5 - Option 2		Policy H5 - Option 2		Policy H5 - Option 2		Policy H5 - Option 2		Policy H5 - Option 2		Policy H5 - Option 2	
Policy EN2		Policy H9		Policy H9		Policy H9		Policy H9		Policy H9		Policy H9	
INDEX increased CIL		Policy H10		Policy H10		Policy H10		Policy H10		Policy H10		Policy H10	
		M4 (2) - 30%		M4 (2) - 35%		M4 (2) - 40%		M4 (2) - 30%		M4 (2) - 35%		M4 (2) - 40%	
		M4 (3) - 2%		M4 (3) - 3%		M4 (3) - 5%		M4 (3) - 2%		M4 (3) - 3%		M4 (3) - 5%	
		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m	
		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)	
		Adaptable				Accessible							
Averages [small sites]													
Zone 1	£268,797	£132,239	-51%	£130,431	-51%	£127,294	-53%	£130,887	-51%	£128,403	-52%	£123,913	-54%
Zone 2a	£193,531	£110,845	-43%	£108,716	-44%	£104,904	-46%	£108,994	-44%	£105,939	-45%	£100,275	-48%
Zone 2b	£438,452	£271,958	-38%	£270,225	-38%	£267,157	-39%	£270,527	-38%	£268,080	-39%	£263,582	-40%
Zone 3	£497,098	£244,360	-51%	£242,101	-51%	£238,108	-52%	£242,509	-51%	£239,324	-52%	£233,480	-53%
Average [medium sites]													
Zone 1	£253,396	£101,731	-60%	£100,106	-60%	£97,284	-62%	£100,515	-60%	£98,281	-61%	£94,243	-63%
Zone 2a	£11,423	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£194,296	£102,888	-47%	£101,665	-48%	£99,517	-49%	£101,913	-48%	£100,203	-48%	£97,080	-50%
Zone 3	£262,157	£119,961	-54%	£117,757	-55%	£113,850	-57%	£118,131	-55%	£115,013	-56%	£109,276	-58%
Average [large sites]													
Zone 1	£273,423	£115,607	-58%	£113,678	-58%	£111,021	-59%	£114,156	-58%	£111,957	-59%	£108,153	-60%
Zone 2a	£19,712	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£103,887	£48,789	-53%	£48,006	-54%	£46,627	-55%	£48,160	-54%	£47,063	-55%	£45,055	-57%
Zone 3	£274,573	£124,039	-55%	£121,848	-56%	£117,962	-57%	£122,215	-55%	£119,112	-57%	£113,401	-59%
Averages [small sites]		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m	
Zone 1	£268,797	£133,165	-50%	£131,210	-51%	£127,820	-52%	£131,707	-51%	£129,024	-52%	£124,175	-54%
Zone 2a	£193,531	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£438,452	£283,725	-35%	£281,951	-36%	£278,810	-36%	£282,259	-36%	£279,752	-36%	£275,145	-37%
Zone 3	£497,098	£276,586	-44%	£274,210	-45%	£270,007	-46%	£274,633	-45%	£271,281	-45%	£265,126	-47%
Average [medium sites]													
Zone 1	£253,396	£125,286	-51%	£122,980	-51%	£118,973	-53%	£123,554	-51%	£120,381	-52%	£114,643	-55%
Zone 2a	£11,423	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£194,296	£107,243	-45%	£105,958	-45%	£103,699	-47%	£106,220	-45%	£104,424	-46%	£101,143	-48%
Zone 3	£262,157	£141,543	-46%	£139,223	-47%	£135,106	-48%	£139,612	-47%	£136,326	-48%	£130,278	-50%
Average [large sites]													
Zone 1	£273,423	£131,229	-52%	£129,193	-53%	£125,646	-54%	£129,702	-53%	£126,893	-54%	£121,812	-55%
Zone 2a	£19,712	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£103,887	£55,245	-47%	£54,417	-48%	£52,960	-49%	£54,580	-47%	£53,420	-49%	£51,299	-51%
Zone 3	£274,573	£132,161	-52%	£129,832	-53%	£125,703	-54%	£130,227	-53%	£126,930	-54%	£120,867	-56%
Averages [small sites]		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m	
Zone 1	£268,797	£153,659	-43%	£151,625	-44%	£148,095	-45%	£152,139	-43%	£149,345	-44%	£144,295	-46%
Zone 2a	£193,531	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£438,452	£296,789	-32%	£294,969	-33%	£291,745	-33%	£295,283	-33%	£292,710	-33%	£287,980	-34%
Zone 3	£497,098	£312,769	-37%	£310,262	-38%	£305,825	-38%	£310,702	-37%	£307,162	-38%	£300,657	-40%
Average [medium sites]													
Zone 1	£253,396	£132,390	-48%	£129,935	-49%	£125,672	-50%	£130,549	-48%	£127,173	-50%	£121,432	-52%
Zone 2a	£11,423	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£194,296	£127,353	-34%	£126,001	-35%	£123,623	-36%	£126,272	-35%	£124,380	-36%	£120,921	-38%
Zone 3	£262,157	£165,777	-37%	£163,325	-38%	£158,973	-39%	£163,731	-38%	£160,257	-39%	£153,860	-41%
Average [large sites]													
Zone 1	£273,423	£144,645	-47%	£142,039	-48%	£138,241	-49%	£142,689	-48%	£139,561	-49%	£134,171	-51%
Zone 2a	£19,712	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£103,887	£61,521	-41%	£60,643	-42%	£59,096	-43%	£60,815	-41%	£59,584	-43%	£57,332	-45%
Zone 3	£274,573	£156,150	-43%	£153,690	-44%	£149,326	-46%	£154,101	-44%	£150,617	-45%	£144,204	-47%
Averages [small sites]		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m	
Zone 1	£268,797	£203,848	-24%	£201,715	-25%	£198,007	-26%	£202,242	-25%	£199,305	-26%	£193,992	-28%
Zone 2a	£193,531	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£438,452	£311,289	-29%	£309,438	-29%	£306,157	-30%	£309,754	-29%	£307,135	-30%	£302,319	-31%
Zone 3	£497,098	£353,687	-29%	£351,032	-29%	£346,328	-30%	£351,491	-29%	£347,738	-30%	£340,838	-31%
Average [medium sites]													
Zone 1	£253,396	£160,250	-37%	£157,660	-38%	£153,155	-40%	£158,304	-38%	£154,740	-39%	£148,263	-41%
Zone 2a	£11,423	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£194,296	£126,250	-35%	£124,773	-36%	£122,180	-37%	£125,078	-36%	£123,015	-37%	£119,251	-39%
Zone 3	£262,157	£168,320	-36%	£165,673	-37%	£160,984	-39%	£166,127	-37%	£162,385	-38%	£155,503	-41%
Average [large sites]													
Zone 1	£273,423	£163,676	-40%	£160,934	-41%	£156,153	-43%	£161,616	-41%	£157,837	-42%	£151,327	-45%
Zone 2a	£19,712	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£103,887	£68,141	-34%	£67,204	-35%	£65,555	-37%	£67,389	-35%	£66,076	-36%	£63,675	-39%
Zone 3	£274,573	£171,735	-37%	£169,105	-38%	£164,442	-40%	£169,549	-38%	£165,826	-40%	£158,977	-42%
CITY CENTRE													
Averages [small sites]													
Zone 4	£1,593,694	£257,821	-84%	£239,861	-85%	£209,892	-87%	£251,606	-84%	£230,538	-86%	£194,354	-88%
Average [medium sites]													
Zone 4	£1,253,172	£756,606	-40%	£739,864	-41%	£711,914	-43%	£750,440	-40%	£730,615	-42%	£696,194	-44%
Average [large sites]													
Zone 4	£877,777	£490,586	-44%	£477,449	-46%	£455,519	-48%	£485,802	-45%	£470,273	-46%	£443,560	-49%

Table 44 - H5 Affordable Housing - Option 3 [CUMULATIVE] - BROWNFIELD													
Base Case		Base Case plus		Base Case plus		Base Case plus		Base Case plus		Base Case plus		Base Case plus	
Policy H5 - Option 1		Policy H5 - Option 3		Policy H5 - Option 3		Policy H5 - Option 3		Policy H5 - Option 3		Policy H5 - Option 3		Policy H5 - Option 3	
Policy EN1		Policy H9		Policy H9		Policy H9		Policy H9		Policy H9		Policy H9	
Policy EN2		Policy H10		Policy H10		Policy H10		Policy H10		Policy H10		Policy H10	
INDEX increased CIL		M4 (2) - 30%		M4 (2) - 35%		M4 (2) - 40%		M4 (2) - 30%		M4 (2) - 35%		M4 (2) - 40%	
		M4 (3) - 2%		M4 (3) - 3%		M4 (3) - 5%		M4 (3) - 2%		M4 (3) - 3%		M4 (3) - 5%	
		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m		Policy G4 - 80sq.m	
		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)		Policy G5 (Zone 4 only)	
		Adaptable				Accessible							
Averages [small sites]													
Zone 1	E268,797	E202,397	-25%	E200,032	-26%	E197,669	-26%	E201,078	-25%	E198,695	-26%	E194,371	-28%
Zone 2a	E193,531	E110,845	-43%	E108,716	-44%	E104,904	-46%	E108,994	-44%	E105,939	-45%	E100,275	-48%
Zone 2b	E438,452	E271,958	-38%	E270,058	-38%	E267,157	-39%	E270,527	-38%	E268,080	-39%	E263,582	-40%
Zone 3	E497,098	E233,921	-53%	E231,026	-54%	E227,668	-54%	E232,069	-53%	E228,885	-54%	E223,041	-55%
Average [medium sites]													
Zone 1	E253,396	E190,844	-25%	E188,082	-26%	E185,235	-27%	E189,271	-25%	E186,441	-26%	E181,302	-28%
Zone 2a	E11,423	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E194,296	E112,522	-42%	E111,122	-43%	E109,194	-44%	E111,554	-43%	E109,864	-43%	E106,773	-45%
Zone 3	E262,157	E110,004	-58%	E107,312	-59%	E103,894	-60%	E108,175	-59%	E105,056	-60%	E99,320	-62%
Average [large sites]													
Zone 1	E273,423	E213,549	-22%	E210,644	-23%	E207,621	-24%	E211,879	-23%	E208,887	-24%	E203,447	-26%
Zone 2a	E19,712	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E103,887	E62,757	-40%	E61,853	-40%	E60,663	-42%	E62,138	-40%	E61,072	-41%	E59,117	-43%
Zone 3	E274,573	E113,093	-59%	E110,449	-60%	E107,016	-61%	E111,269	-59%	E108,166	-61%	E102,455	-63%
Averages [small sites]													
Zone 1	E268,797	E203,610	-24%	E201,129	-25%	E198,568	-26%	E202,208	-25%	E199,669	-26%	E195,064	-27%
Zone 2a	E193,531	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E438,452	E283,725	-35%	E281,784	-36%	E278,810	-36%	E282,259	-36%	E279,752	-36%	E275,145	-37%
Zone 3	E497,098	E266,146	-46%	E263,136	-47%	E259,568	-48%	E264,194	-47%	E260,842	-48%	E254,686	-49%
Average [medium sites]													
Zone 1	E253,396	E218,834	-14%	E215,923	-15%	E212,928	-16%	E217,174	-14%	E214,193	-15%	E208,778	-18%
Zone 2a	E11,423	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E194,296	E118,201	-39%	E116,688	-40%	E114,700	-41%	E117,185	-40%	E115,408	-41%	E112,159	-42%
Zone 3	E262,157	E131,587	-50%	E128,778	-51%	E125,150	-52%	E129,656	-51%	E126,370	-52%	E120,322	-54%
Average [large sites]													
Zone 1	E273,423	E237,299	-13%	E234,229	-14%	E231,040	-16%	E235,535	-14%	E232,375	-15%	E226,629	-17%
Zone 2a	E19,712	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E103,887	E69,936	-33%	E68,986	-34%	E67,725	-35%	E69,282	-33%	E68,156	-34%	E66,090	-36%
Zone 3	E274,573	E121,215	-56%	E118,432	-57%	E114,757	-58%	E119,280	-57%	E115,984	-58%	E109,921	-60%
Averages [small sites]													
Zone 1	E268,797	E223,817	-17%	E221,225	-18%	E218,470	-19%	E222,330	-17%	E219,637	-18%	E214,753	-20%
Zone 2a	E193,531	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E438,452	E296,789	-32%	E294,802	-33%	E291,745	-33%	E295,283	-33%	E292,710	-33%	E287,980	-34%
Zone 3	E497,098	E302,330	-39%	E299,188	-40%	E295,385	-41%	E300,263	-40%	E296,723	-40%	E290,218	-42%
Average [medium sites]													
Zone 1	E253,396	E229,475	-9%	E226,410	-11%	E223,184	-12%	E227,709	-10%	E224,536	-11%	E218,771	-14%
Zone 2a	E11,423	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E194,296	E138,311	-29%	E136,732	-30%	E134,623	-31%	E137,237	-29%	E135,364	-30%	E131,938	-32%
Zone 3	E262,157	E155,820	-41%	E152,880	-42%	E149,017	-43%	E153,775	-41%	E150,300	-43%	E143,904	-45%
Average [large sites]													
Zone 1	E273,423	E256,840	-6%	E253,575	-7%	E250,188	-8%	E254,966	-7%	E251,608	-8%	E245,504	-10%
Zone 2a	E19,712	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E103,887	E77,219	-26%	E76,210	-27%	E74,872	-28%	E76,525	-26%	E75,330	-27%	E73,137	-30%
Zone 3	E274,573	E145,204	-47%	E142,290	-48%	E138,379	-50%	E143,155	-48%	E139,671	-49%	E133,258	-51%
Averages [small sites]													
Zone 1	E268,797	E274,005	2%	E271,315	1%	E268,383	0%	E272,432	1%	E269,597	0%	E264,450	-2%
Zone 2a	E193,531	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E438,452	E311,289	-29%	E309,275	-29%	E306,157	-30%	E309,754	-29%	E307,135	-30%	E302,319	-31%
Zone 3	E497,098	E343,248	-31%	E339,957	-32%	E335,889	-32%	E341,052	-31%	E337,298	-32%	E330,399	-34%
Average [medium sites]													
Zone 1	E253,396	E263,750	4%	E260,488	3%	E257,076	1%	E261,874	3%	E258,506	2%	E252,385	0%
Zone 2a	E11,423	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E194,296	E156,262	-20%	E154,533	-20%	E152,364	-22%	E155,122	-20%	E153,141	-21%	E149,514	-23%
Zone 3	E262,157	E154,700	-41%	E151,565	-42%	E147,364	-44%	E152,507	-42%	E148,765	-43%	E141,883	-46%
Average [large sites]													
Zone 1	E273,423	E285,232	4%	E281,361	3%	E277,754	2%	E282,886	3%	E279,263	2%	E272,767	0%
Zone 2a	E19,712	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%	E0	-100%
Zone 2b	E103,887	E84,845	-18%	E83,765	-19%	E82,342	-21%	E84,106	-19%	E82,831	-20%	E80,493	-23%
Zone 3	E274,573	E160,789	-41%	E157,639	-43%	E153,496	-44%	E158,603	-42%	E154,880	-44%	E148,031	-46%
CITY CENTRE													
Averages [small sites]													
Zone 4	E1,593,694	E194,381	-88%	E176,420	-89%	E146,451	-91%	E188,166	-88%	E167,098	-90%	E130,913	-92%
Average [medium sites]													
Zone 4	E1,253,172	E680,422	-46%	E663,142	-47%	E634,295	-49%	E674,058	-46%	E653,597	-48%	E618,386	-51%
Average [large sites]													
Zone 4	E877,777	E424,395	-52%	E411,258	-53%	E389,328	-56%	E419,611	-52%	E404,082	-54%	E377,369	-57%

Table 45 - H5 Affordable Housing - Option 4 [CUMULATIVE] - Brownfield													
Base Case		Base Case plus		Base Case plus		Base Case plus		Base Case plus		Base Case plus		Base Case plus	
Policy H5 - Option 1 Policy EN1 Policy EN2 INDEX increased CIL		Policy EN8 Policy H5 - Option 4 Policy H9 Policy H10 M4 (2) - 30% M4 (3) - 2% Policy G4 - 80sq.m Policy G5 (Zone 4 only)		Policy EN8 Policy H5 - Option 4 Policy H9 Policy H10 M4 (2) - 35% M4 (3) - 3% Policy G4 - 80sq.m Policy G5 (Zone 4 only)		Policy EN8 Policy H5 - Option 4 Policy H9 Policy H10 M4 (2) - 40% M4 (3) - 5% Policy G4 - 80sq.m Policy G5 (Zone 4 only)		Policy EN8 Policy H5 - Option 4 Policy H9 Policy H10 M4 (2) - 30% M4 (3) - 2% Policy G4 - 80sq.m Policy G5 (Zone 4 only)		Policy EN8 Policy H5 - Option 4 Policy H9 Policy H10 M4 (2) - 35% M4 (3) - 3% Policy G4 - 80sq.m Policy G5 (Zone 4 only)		Policy EN8 Policy H5 - Option 4 Policy H9 Policy H10 M4 (2) - 40% M4 (3) - 5% Policy G4 - 80sq.m Policy G5 (Zone 4 only)	
Adaptable						Accessible							
Averages [small sites]													
Zone 1	£268,797	£318,522	18%	£316,089	18%	£311,813	16%	£316,585	18%	£313,184	17%	£307,225	14%
Zone 2a	£193,531	£110,845	-43%	£108,716	-44%	£104,904	-46%	£108,994	-44%	£105,939	-45%	£100,275	-48%
Zone 2b	£438,452	£298,203	-32%	£296,524	-32%	£293,541	-33%	£296,794	-32%	£294,410	-33%	£290,018	-34%
Zone 3	£497,098	£292,051	-41%	£289,911	-42%	£286,105	-42%	£290,247	-42%	£287,205	-42%	£281,594	-43%
Average [medium sites]													
Zone 1	£253,396	£299,027	18%	£296,624	17%	£292,400	15%	£297,109	17%	£293,748	16%	£287,606	14%
Zone 2a	£11,423	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£194,296	£138,592	-29%	£137,449	-29%	£135,428	-30%	£137,654	-29%	£136,041	-30%	£133,081	-32%
Zone 3	£262,157	£146,107	-44%	£143,994	-45%	£140,232	-47%	£144,313	-45%	£141,304	-46%	£135,748	-48%
Average [large sites]													
Zone 1	£273,423	£321,274	18%	£318,923	17%	£314,785	15%	£319,391	17%	£316,098	16%	£310,077	13%
Zone 2a	£19,712	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£103,887	£76,600	-26%	£75,872	-27%	£74,579	-28%	£75,993	-27%	£74,961	-28%	£73,061	-30%
Zone 3	£274,573	£146,617	-47%	£144,511	-47%	£140,759	-49%	£144,826	-47%	£141,824	-48%	£136,281	-50%
Averages [small sites]													
		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m		Policy G4 - 60sq.m	
Zone 1	£268,797	£329,343	23%	£326,753	22%	£322,206	20%	£327,288	22%	£323,672	20%	£317,070	18%
Zone 2a	£193,531	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£438,452	£309,836	-29%	£308,133	-30%	£305,107	-30%	£308,405	-30%	£305,987	-30%	£301,530	-31%
Zone 3	£497,098	£324,277	-35%	£322,020	-35%	£318,005	-36%	£322,371	-35%	£319,161	-36%	£313,240	-37%
Average [medium sites]													
Zone 1	£253,396	£338,940	34%	£336,413	33%	£331,968	31%	£336,917	33%	£333,379	32%	£326,911	29%
Zone 2a	£11,423	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£194,296	£153,820	-21%	£152,618	-21%	£150,490	-23%	£152,830	-21%	£151,133	-22%	£148,014	-24%
Zone 3	£262,157	£167,689	-36%	£165,460	-37%	£161,488	-38%	£165,794	-37%	£162,617	-38%	£156,750	-40%
Average [large sites]													
Zone 1	£273,423	£351,585	29%	£349,101	28%	£344,729	26%	£349,594	28%	£346,115	27%	£339,752	24%
Zone 2a	£19,712	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£103,887	£83,779	-19%	£83,008	-20%	£81,641	-21%	£83,137	-20%	£82,044	-21%	£80,034	-23%
Zone 3	£274,573	£154,738	-44%	£152,494	-44%	£148,499	-46%	£152,837	-44%	£149,643	-45%	£143,746	-48%
Averages [small sites]													
		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m		Policy G4 - 40sq.m	
Zone 1	£268,797	£354,714	32%	£351,968	31%	£347,144	29%	£352,534	31%	£348,698	30%	£341,694	27%
Zone 2a	£193,531	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£438,452	£322,659	-26%	£320,911	-27%	£317,804	-28%	£321,189	-27%	£318,706	-27%	£314,129	-28%
Zone 3	£497,098	£360,461	-27%	£358,073	-28%	£353,822	-29%	£358,440	-28%	£355,042	-29%	£348,772	-30%
Average [medium sites]													
Zone 1	£253,396	£356,054	41%	£353,359	39%	£348,620	38%	£353,902	40%	£350,131	38%	£343,240	35%
Zone 2a	£11,423	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£194,296	£173,697	-11%	£172,449	-11%	£170,237	-12%	£172,666	-11%	£170,901	-12%	£167,658	-14%
Zone 3	£262,157	£191,923	-27%	£189,562	-28%	£185,355	-29%	£189,913	-28%	£186,548	-29%	£180,331	-31%
Average [large sites]													
Zone 1	£273,423	£381,245	39%	£378,608	38%	£373,967	37%	£379,132	39%	£375,438	37%	£368,683	35%
Zone 2a	£19,712	£5,481	-72%	£2,892	-85%	£0	-100%	£3,324	-83%	£0	-100%	£0	-100%
Zone 2b	£103,887	£91,927	-12%	£91,109	-12%	£89,658	-14%	£91,245	-12%	£90,086	-13%	£87,952	-15%
Zone 3	£274,573	£178,727	-35%	£176,352	-36%	£172,122	-37%	£176,712	-36%	£173,329	-37%	£167,084	-39%
Averages [small sites]													
		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m		Policy G4 - 20sq.m	
Zone 1	£268,797	£417,103	55%	£414,205	54%	£409,111	52%	£414,791	54%	£410,738	53%	£403,332	50%
Zone 2a	£193,531	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£438,452	£337,002	-23%	£335,203	-24%	£332,005	-24%	£335,487	-23%	£332,931	-24%	£328,218	-25%
Zone 3	£497,098	£401,379	-19%	£398,842	-20%	£394,326	-21%	£399,229	-20%	£395,618	-20%	£388,952	-22%
Average [medium sites]													
Zone 1	£253,396	£387,792	53%	£384,913	52%	£379,853	50%	£385,496	52%	£381,470	51%	£374,114	48%
Zone 2a	£11,423	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%	£0	-100%
Zone 2b	£194,296	£191,491	-1%	£190,168	-2%	£187,824	-3%	£190,395	-2%	£188,524	-3%	£185,083	-5%
Zone 3	£262,157	£190,802	-27%	£188,247	-28%	£183,702	-30%	£188,645	-28%	£185,012	-29%	£178,311	-32%
Average [large sites]													
Zone 1	£273,423	£417,034	53%	£414,226	51%	£409,284	50%	£414,783	52%	£410,849	50%	£403,656	48%
Zone 2a	£19,712	£18,066	-8%	£15,452	-22%	£10,774	-45%	£15,886	-19%	£12,183	-38%	£5,106	-74%
Zone 2b	£103,887	£101,284	-3%	£100,413	-3%	£98,867	-5%	£100,558	-3%	£99,323	-4%	£97,051	-7%
Zone 3	£274,573	£202,693	-26%	£200,170	-27%	£195,674	-29%	£200,549	-27%	£196,953	-28%	£190,313	-31%
CITY CENTRE													
Averages [small sites]													
Zone 4	£1,593,694	£580,600	-64%	£563,205	-65%	£534,154	-66%	£573,894	-64%	£553,146	-65%	£517,389	-68%
Average [medium sites]													
Zone 4	£1,253,172	£953,440	-24%	£937,082	-25%	£909,754	-27%	£946,942	-24%	£927,334	-26%	£893,507	-29%
Average [large sites]													
Zone 4	£877,777	£631,312	-28%	£618,466	-30%	£597,010	-32%	£626,275	-29%	£610,911	-30%	£584,418	-33%

Table 46 - Inner Area

	Scenario 1 (base case) Contamination @ £82,500 per ha Site Preparation @ £140,000 per ha	Scenario 2 75% 75%	Scenario 3 50% 50%	Scenario 4 25% 25%	Scenario 5 0% 100%	Scenario 6 0% 75%	Scenario 7 0% 50%	Scenario 8 0% 25%	Scenario 9 100% 0%	Scenario 10 75% 0%	Scenario 11 50% 0%	Secenario 12 25% 0%
Table 16												
Averages [small sites]	497,098	520,668	544,239	567,809	542,275	554,551	566,827	579,104	546,203	557,497	568,792	580,086
Average [medium sites]	262,157	285,728	309,298	332,869	307,334	319,610	331,887	344,163	311,263	322,557	333,851	345,145
Average [large sites]	274,573	298,144	321,714	345,285	319,750	332,026	344,303	356,579	323,679	334,973	346,267	357,561

Affordable Housing at 5%

Averages [small sites]	400,390 -19%
Average [medium sites]	219,163 -16%
Average [large sites]	207,423 -24%

Affordable Housing at 6%

Averages [small sites]	400,390 -19%	423,961 -19%	447,531 -18%	471,102 -17%	445,567 -18%	457,843 -17%	470,120 -17%	482,396 -17%	449,495 -18%	460,790 -17%	472,084 -17%	483,378 -17%
Average [medium sites]	194,301 -26%	217,872 -24%	241,443 -22%	265,013 -20%	239,478 -22%	251,755 -21%	264,031 -20%	276,307 -20%	243,407 -22%	254,701 -21%	265,995 -20%	277,290 -20%
Average [large sites]	194,180 -29%	217,750 -27%	241,321 -25%	264,892 -23%	239,357 -25%	251,633 -24%	263,909 -23%	276,186 -23%	243,285 -25%	254,579 -24%	265,874 -23%	277,168 -22%

Affordable Housing at 7%

Averages [small sites]	312,769 -37%	336,340 -35%	359,910 -34%	383,481 -32%	357,946 -34%	370,223 -33%	382,499 -33%	394,775 -32%	361,875 -34%	373,169 -33%	384,463 -32%	395,757 -32%
Average [medium sites]	194,301 -26%	217,872 -24%	241,443 -22%	265,013 -20%	239,478 -22%	251,755 -21%	264,031 -20%	276,307 -20%	243,407 -22%	254,701 -21%	265,995 -20%	277,290 -20%
Average [large sites]	180,936 -34%	204,507 -31%	228,077 -29%	251,648 -27%	226,113 -29%	238,390 -28%	250,666 -27%	262,942 -26%	230,042 -29%	241,336 -28%	252,630 -27%	263,924 -26%

Affordable Housing at 8%

Averages [small sites]	312,769 -37%	336,340 -35%	359,910 -34%	383,481 -32%	357,946 -34%	370,223 -33%	382,499 -33%	394,775 -32%	361,875 -34%	373,169 -33%	384,463 -32%	395,757 -32%
Average [medium sites]	165,777 -37%	189,347 -34%	212,918 -31%	236,488 -29%	210,954 -31%	223,230 -30%	235,506 -29%	247,783 -28%	214,882 -31%	226,176 -30%	237,471 -29%	248,765 -28%
Average [large sites]	180,936 -34%	204,507 -31%	228,077 -29%	251,648 -27%	226,113 -29%	238,390 -28%	250,666 -27%	262,942 -26%	230,042 -29%	241,336 -28%	252,630 -27%	263,924 -26%

Affordable Housing at 9%

Averages [small sites]	312,769 -37%	336,340 -35%	359,910 -34%	383,481 -32%	357,946 -34%	370,223 -33%	382,499 -33%	394,775 -32%	361,875 -34%	373,169 -33%	384,463 -32%	395,757 -32%
Average [medium sites]	165,777 -37%	189,347 -34%	212,918 -31%	236,488 -29%	210,954 -31%	223,230 -30%	235,506 -29%	247,783 -28%	214,882 -31%	226,176 -30%	237,471 -29%	248,765 -28%
Average [large sites]	169,394 -38%	192,964 -35%	216,535 -33%	240,105 -30%	214,571 -33%	226,847 -32%	239,123 -31%	251,400 -29%	218,499 -32%	229,793 -31%	241,087 -30%	252,382 -29%

Affordable Housing at 10%

Averages [small sites]	312,769 -37%	336,340 -35%	359,910 -34%	383,481 -32%	357,946 -34%	370,223 -33%	382,499 -33%	394,775 -32%	361,875 -34%	373,169 -33%	384,463 -32%	395,757 -32%
Average [medium sites]	165,777 -37%	189,347 -34%	212,918 -31%	236,488 -29%	210,954 -31%	223,230 -30%	235,506 -29%	247,783 -28%	214,882 -31%	226,176 -30%	237,471 -29%	248,765 -28%
Average [large sites]	156,150 -43%	179,721 -40%	203,291 -37%	226,862 -34%	201,327 -37%	213,603 -36%	225,880 -34%	238,156 -33%	205,255 -37%	216,550 -35%	227,844 -34%	239,138 -33%



Table 47 - City Centre

	Scenario 1 (base case) 100% 100%	Scenario 2 75% 75%	Scenario 3 50% 50%	Scenario 4 25% 25%	Scenario 5 0% 100%	Scenario 6 0% 75%	Scenario 7 0% 50%	Scenario 8 0% 25%	Scenario 9 100% 0%	Scenario 10 75% 0%	Scenario 11 50% 0%	Secenario 12 25% 0%
Table 16												
Averages [small sites]	1,593,694	1,613,858	1,634,022	1,654,185	1,623,668	1,636,338	1,649,009	1,661,679	1,644,375	1,651,868	1,659,362	1,666,856
Average [medium sites]	1,253,172	1,272,709	1,292,246	1,311,783	1,282,215	1,294,491	1,306,767	1,319,044	1,302,278	1,309,538	1,316,799	1,324,059
Average [large sites]	877,777	897,314	916,851	936,388	906,820	919,096	931,372	943,649	926,883	934,143	941,404	948,664

Affordable Housing at 5%

Averages [small sites]	1,478,934 -7%
Average [medium sites]	1,163,371 -7%
Average [large sites]	806,565 -8%

Affordable Housing at 6%

Averages [small sites]	1,478,934 -7%
Average [medium sites]	974,777 -22%
Average [large sites]	777,804 -11%

Affordable Housing at 7%

Averages [small sites]	1,478,934 -7%	1,499,097 -7%	1,519,261 -7%	1,539,425 -7%	1,508,908 -7%	1,521,578 -7%	1,534,248 -7%	1,546,918 -7%	1,529,615 -7%	1,537,108 -7%	1,544,602 -7%	1,552,095 -7%
Average [medium sites]	974,777 -22%	994,314 -22%	1,013,851 -22%	1,033,388 -21%	1,003,819 -22%	1,016,095 -22%	1,028,372 -21%	1,040,648 -21%	1,023,882 -21%	1,031,143 -21%	1,038,403 -21%	1,045,664 -21%
Average [large sites]	702,370 -20%	721,907 -20%	741,444 -19%	760,981 -19%	731,413 -19%	743,689 -19%	755,965 -19%	768,242 -19%	751,476 -19%	758,736 -19%	765,997 -19%	773,257 -18%

Affordable Housing at 8%

Averages [small sites]	1,478,934 -7%	1,499,097 -7%	1,519,261 -7%	1,539,425 -7%	1,508,908 -7%	1,521,578 -7%	1,534,248 -7%	1,546,918 -7%	1,529,615 -7%	1,537,108 -7%	1,544,602 -7%	1,552,095 -7%
Average [medium sites]	756,606 -40%	776,143 -39%	795,680 -38%	815,217 -38%	785,648 -39%	797,925 -38%	810,201 -38%	822,477 -38%	805,711 -38%	812,972 -38%	820,233 -38%	827,493 -38%
Average [large sites]	673,609 -23%	693,146 -23%	712,683 -22%	732,220 -22%	702,651 -23%	714,928 -22%	727,204 -22%	739,480 -22%	722,715 -22%	729,975 -22%	737,236 -22%	744,496 -22%

Affordable Housing at 9%

Averages [small sites]	1,478,934 -7%	1,499,097 -7%	1,519,261 -7%	1,539,425 -7%	1,508,908 -7%	1,521,578 -7%	1,534,248 -7%	1,546,918 -7%	1,529,615 -7%	1,537,108 -7%	1,544,602 -7%	1,552,095 -7%
Average [medium sites]	756,606 -40%	776,143 -39%	795,680 -38%	815,217 -38%	785,648 -39%	797,925 -38%	810,201 -38%	822,477 -38%	805,711 -38%	812,972 -38%	820,233 -38%	827,493 -38%
Average [large sites]	575,430 -34%	594,967 -34%	614,504 -33%	634,041 -32%	604,472 -33%	616,749 -33%	629,025 -32%	641,301 -32%	624,535 -33%	631,796 -32%	639,057 -32%	646,317 -32%

Affordable Housing at 10%

Averages [small sites]	1,478,934 -7%	1,499,097 -7%	1,519,261 -7%	1,539,425 -7%	1,508,908 -7%	1,521,578 -7%	1,534,248 -7%	1,546,918 -7%	1,529,615 -7%	1,537,108 -7%	1,544,602 -7%	1,552,095 -7%
Average [medium sites]	756,606 -40%	776,143 -39%	795,680 -38%	815,217 -38%	785,648 -39%	797,925 -38%	810,201 -38%	822,477 -38%	805,711 -38%	812,972 -38%	820,233 -38%	827,493 -38%
Average [large sites]	490,586 -44%	510,123 -43%	529,660 -42%	549,197 -41%	519,628 -43%	531,905 -42%	544,181 -42%	556,457 -41%	539,691 -42%	546,952 -41%	554,212 -41%	561,473 -41%



14. Community Infrastructure Levy (CIL) Review

- 14.1 CIL was adopted by Full Council on 12th November 2014 and the charges became effective across Leeds from the 6th April 2015. The CIL Rates have been index linked in accordance with CIL Regulation 40 using the BCIS All-In Tender Price Index value for the 1st November for the preceding year. As outlined earlier the base appraisals include index inflated CIL charges. The current CIL rates including indexation are set out below

Table 46 – Residential CIL Charges

Zone	Current Charge (£psm)	Increase (£psm)
Zone 1	£97.99psm	£7.99
Zone 2a	£25.04psm	£2.04
Zone 2b	£49.00psm	£4.00
Zone 3	£5.44psm	£0.44p
Zone 4	£5.44psm	£0.44p

- 14.2 Having considered the cumulative impact of the suggested policy changes in the Core Strategy Selective Review we believe there is no scope to increase the CIL charging rates over and above any increases permitted in accordance with CIL Regulation 40.

15. Conclusions and Recommendations

- 15.1 The Viability Study is intended to establish an understanding of the suggested policy approaches being considered as part of the Core Strategy Selective Review.

- 15.2 The NPPF promotes sustainable development, ensuring that the appropriate balance is struck between economic, social and environmental dimensions of growth, and that appropriate necessary infrastructure is delivered. The NPPF also emphasises that plans must be deliverable and the economic viability of development is critical for this. In particular the guidance states at para 173

Pursuing sustainable development requires careful attention to viability and costs in plan making and decision taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, design standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

- 15.3 Paragraph 174 further states that.....

Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put the implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence.

Definition of viability

- 15.4 The Harman Report provides the definition of viability in the context of testing local plans, and also establishes the link between viability and the concept of deliverability. The documents states that:

An individual development can be said to be viable, if after taking account of all costs, including central and local government policy and regulatory costs and availability of development finance, the scheme provides a competitive return to the developer to ensure that development takes place and generates a land value sufficient to persuade the land owner to sell the land for the development proposed. If these conditions are not met, a scheme will not be delivered.

At Local Plan level, viability is very closely linked to the concept of deliverability. In the case of housing, a Local Plan can be said to be deliverable if sufficient sites are viable – as defined previously – to deliver the plan's planned growth over the plan period.

- 15.5 The Harman Report identifies that the primary role of the Local Plan viability assessment is to provide evidence that the requirements of the NPPF have been met. As such it should consider the cumulative impact of national and local policies upon the economic viability of development.
- 15.6 The report recognises that Local Plan viability assessment is not conducted to give a precise answer as to the viability of every development likely to take place during the plan period, nor is it there to provide a definitive 'yes or no' to the likelihood of development across the whole plan area or plan period. Instead it seeks to provide a high level assurance that the policies within the plan have been considered for their cumulative impacts, and that these are not likely to compromise the economic viability of development needed to deliver the plan.

Conclusions and Recommendations

- 15.7 We have summarised our recommendations below.
- 15.8 We recommend that the policy for affordable housing remains as currently set out under Policy H5 of the adopted Core Strategy for Zones 1 and 2. However, our analysis has suggested that affordable housing can be increased to 7% within the Inner Area (Zone 3) and City Centre (Zone 4).
- 15.9 In terms of G4 we suggest that the maximum amount of Greenspace being sought per dwelling should be capped at no more than 40sq.m or the following rates per bed space dwelling: These requirements would be applicable to all development outside of the City Centre.
- 1 bedroom dwelling – 23sq.m
 - 2 bedroom dwelling – 33sq.m
 - 3 bedroom dwelling – 44sq.m
 - 4 bedroom dwelling – 54sq.m
 - 5 or more bedroom dwelling – 66sq.m
 - Student bed spaces – 18sq.m
- 15.10 The changes to Policies to EN1 and EN2, as a result of the Written Ministerial Statement are less onerous to development than the previous policies so are unlikely to threaten the viability of development. The requirements of EN1 and EN2 were included within our base appraisals and all areas of the City, with the exception of Zone 2a, generated land values in excess of the minimum benchmark land values.

- 15.11 A new policy on minimum space standard will not undermine the viability of development across the City.
- 15.12 We think it would be prudent to base Policy H10 on adaptable standards rather than accessible standards as well as basing the policy requirement on the 30% M4 (2) and 2% M4 (3).
- 15.13. A new policy on Electric Vehicle charging infrastructure (Policy EN8) is also viable.