

Telford & Wrekin Council

Regulation 19 Viability Note – December 2024

Introduction

- 1.1 HDH Planning & Development Ltd produced the *Whole Plan Viability Update* (HDH, June 2023). The 2023 WPVA Viability Update was undertaken in line with the requirements of the relevant RICS Guidance and the Harman Guidance (HDH is a firm regulated by the RICS). The 2023 WPVA built on (and replaced) the Council's existing viability work.
- 1.2 A technical consultation was conducted in February 2023 to inform the 2023 WPVA. Representatives of the main developers, development site owners, agents, planning agents and consultants working in the area, and housing associations were invited to comment on an early draft of the report. Their comments fed into the 2023 WPVA. The consultation process was carried out fully in accordance with the requirements of the updated PPG, the Harman Guidance and the RICS Guidance. The 2023 WPVA was published for formal consultation alongside the Regulation 18 of the Draft Local Plan in October 2023. No further technical comments (i.e. concerning the methodology, or assumptions used) were made.
- 1.3 The data in the 2023 WPVA Viability Update was based in May 2023. Over the 18 months or so since the 2023 WPVA was undertaken, the costs and the values, being the main inputs into a viability assessment, have changed and several changes / clarifications have been made to national policy. The Council has also refined some of the policies in the emerging Local Plan.
- 1.4 As this note was being completed, the Government published a new, December 2024, iteration of the NPPF. This includes some major changes to the planning system. The changes are considered in Section 4 below.
- 1.5 This December 2024 note considers how these changes may impact on viability, and whether it is necessary for the Council to fully update the viability evidence before submitting the Local Plan for examination.

Changes in House Prices

- 2.1 The residential value assumptions in the 2023 WPVA were researched and gathered in October 2022 and then updated (following the technical consultation) in April 2023. There are a range of data sources that can be referenced, however the Land Registry is the most complete.

Table 2.1 Change in Average House Prices

	Telford & Wrekin	West Midlands	England & Wales
Apr-23	£223,453	£241,898	£291,676
Sep-24	£236,295	£257,129	£303,769
	£12,842 5.75%	£15,231 6.30%	£12,093 4.15%

Source: Land Registry (November 2024)

- 2.2 This data shows that average prices have increased about 6%, which is broadly similar to those changes seen regionally (6%) and a little more than those seen nationally (4%). This data can be disaggregated and newbuild sales separated out.

Table 2.2 Change in Average Newbuild House Prices – Telford & Wrekin

	Newbuild	Existing
Apr-23	£287,300	£216,136
Jul-24	£345,468	£222,452
	£58,168 20.25%	£6,316 2.92%

Source: Land Registry (November 2024)

- 2.3 The Land Registry's latest data suggests that the average newbuild sale price has increased by about 20% over the last 18 months in the Council area, whereas the average sale price of existing homes has risen by about 3%.

Newbuild House Prices

- 2.4 The 2023 WPVA included data on newbuild Price Paid data sourced from Landmark (Table 4.4 and Figure 4.6). In this note, this data has been refreshed. Price Paid data from the Land Registry has been married with the floor areas sourced from the EPC Register, for newbuild sales since the start of 2021. As set out in Table 4.4 of the 2023 WPVA, there was little data available from 2022, when that report was being prepared. This remains the case, and the Land Registry data only includes 37 newbuild sales in 2024.

Table 2.3 Newbuild Price Paid Data by Year – Telford and Wrekin-2024

	Detached	Flat	Semi-detached	Terraced	All
Count					
2022	384	1	248	101	734
2023	182	0	139	23	344
2024	25	0	11	1	37
All	591	1	398	125	1115
Average Price Paid (£)					
2022	£354,217	£319,000	£221,938	£210,381	£289,683
2023	£358,614		£236,466	£216,297	£299,743
2024	£337,493		£240,931	£205,000	£305,204
All	£354,864	£319,000	£227,537	£211,427	£293,302
Average Price Paid (£ per sqm)					
2022	£2,976	£3,097	£2,772	£2,654	£2,861
2023	£3,207		£2,806	£3,017	£3,032
2024	£3,124		£3,072	£2,929	£3,103
All	£3,055	£3,097	£2,792	£2,723	£2,922

	Flat			House		
	Count	Price Paid (£ per sqm)	Price Paid (£)	Count	Price Paid (£ per sqm)	Price Paid (£)
2022	1	£319,000	£3,097	733	£289,643	£2,861
2023	0			344	£299,743	£3,032
2024	0			37	£305,204	£3,103
All	1	£319,000	£3,097	1114	£293,279	£2,922

Source: Land Registry and EPC Register (November 2024)

- 2.5 The above data compares with that presented in Table 4.6 and Appendix 6 of the 2023 WPVA Viability Update – copied below for convenience.

Table 4.6 Prices Paid – Newbuild Homes from 2020 to 2022

	Flat			House		
	Count	£	£/m2	Count	£	£/m2
Admaston & Bratton	0	£0	£0	12	£605,788	£3,046
Apley Castle	0	£0	£0	40	£344,287	£2,864
Arleston	0	£0	£0	24	£278,162	£2,883
College	0	£0	£0	3	£262,300	£2,695
Edgmond & Ercall Magna	0	£0	£0	57	£406,179	£2,812
Ercall	5	£183,000	£2,575	5	£256,600	£2,871
Haygate	0	£0	£0	61	£235,160	£2,367
Horsehay & Lightmoor	4	£137,625	£2,585	57	£229,354	£2,423
Ironbridge Gorge	0	£0	£0	47	£277,766	£2,757
Ketley & Overdale	0	£0	£0	177	£234,831	£2,396
Muxton	0	£0	£0	2	£472,500	£2,939
Newport North & West	0	£0	£0	16	£351,431	£3,015
Newport South & East	0	£0	£0	78	£242,200	£2,619
Oakengates & Ketley Bar	2	£117,000	£2,108	37	£207,334	£2,314
Park	1	£250,000	£1,812	2	£285,000	£2,229
Priorslee	0	£0	£0	113	£280,160	£2,745
Wrockwardine	0	£0	£0	66	£289,528	£2,601
Grand Total	12	£162,458	£2,437	797	£275,338	£2,597

Source: Land Registry and EPC Register (September 2022). Contains HM Land Registry data © Crown copyright. This data is licensed under the Open Government Licence v3.0

- 2.6 This data suggests that average newbuild house prices are about 11% higher than when the 2023 WPVA was undertaken.
- 2.7 A survey of newbuild asking prices was carried out in October 2022. In October 2022 there were 120 newbuild homes being advertised for sale in the Council's area. The analysis of these showed that asking prices for newbuild homes varied considerably, starting at £180,000 and going up to £825,000. The average was about £356,000. When considered on a £ per sqm basis, the average asking price for houses was a little over £3,250 per sqm.
- 2.8 The survey of newbuild asking prices was repeated in November 2024. At the time of this note, there were 212 new homes being marketed in the Telford and Wrekin. The average asking price has increased a little to £3,274 per sqm.

The Wider Housing Market

- 2.9 The development identified in the new Local Plan will be built out over many years and across several development cycles. It is useful to consider how values may change in the future. There is a degree of uncertainty in the housing market as reported by the RICS. The October 2024 RICS UK Residential Market Survey¹ said:

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

Sales market activity continues to rise steadily

- Survey feedback capturing the recent trend in agreed sales and new buyer enquiries remains positive
- Headline house price growth appears to be gradually gaining momentum
- Expectations point to this brighter picture for activity being sustained over the near-term

The October 2024 RICS Residential Survey results continue to signal an improving market backdrop, evidenced by modestly positive readings once again being returned across all headline measures of activity. Furthermore, forward-looking indicators remain consistent with a further pick-up in sales volumes over near-term, although the rise in bond yields in recent weeks is likely to present something of a headwind as it feeds through into general lending conditions.

Looking at buyer demand, the headline net balance for the new buyer enquiries gauge registered a reading of +12% in October (little changed from +13% previously). This extends a run of positive returns for the series into a fourth consecutive month, albeit the latest reading is still only pointing to a modest upward trend in demand.

With respect to agreed sales, an aggregate net balance of +9% of respondents reported an increase in sales volumes over the latest survey period, up from a figure of +5% recorded last month. Importantly, having languished below zero throughout much of the previous two years, this now marks the third successive reading in positive territory. Nevertheless, the recent results signal a modest improvement, rather than a sharp upturn, at this stage. Looking ahead, the near-term sales expectations series posted a net balance of +34% in October, up from a figure of +22% beforehand. Similarly, a net balance of +36% of contributors foresee sales volumes rising over the next twelve months, even if this is slightly more moderate than the reading of +44% seen in September.

For new instructions, the October net balance of +14% is, for the fourth month in a row, pointing to an increase in the flow of instructions coming onto the sales market. Moreover, respondents continue to note that there is currently a greater level of market appraisals being undertaken compared to picture seen at this point twelve months ago. As such, this suggests the near-term pipeline for listings is relatively solid.

Alongside this, a headline net balance of +16% of survey participants reported a rise in house prices over the October survey period. This is up from readings of +11% and zero in September and August respectively, and is consistent with house price growth gaining momentum steadily in recent months. When disaggregated, Northern Ireland, Scotland, the North East, North West, and London all exhibit firmly positive net balances for the house price metric.

Going forward, a rising share of respondents are now of the opinion that house prices will continue to drift higher over the coming three months, with the net balance for this indicator moving to +20% from +12% last time. Moreover, virtually all parts of the UK are expected to see a rise in house prices in the year to come, led by continued robust growth across Northern Ireland and Scotland.

In the lettings market, a net balance of +19% of respondents reported an increase in tenant demand over the three months to October (part of the seasonally adjusted quarterly lettings dataset). At the same time, landlord instructions fell relatively sharply, evidenced by a net balance reading of -29% being recorded in October (the most negative figure since the end of 2021). Due to the continued imbalance between rising demand and dwindling supply across the market, a net balance of +33% of respondents expect rental prices to be driven higher over the coming three months.

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

Table 2.4 Consolidated House Price Forecasts

Table 2 - 2024: Growth in prices and monetary indicators (% change)									
Forecasters and dates of forecasts			CPI (Q4 on Q4 year ago, %)	RPI (Q4 on Q4 year ago, %)	Average earnings (Q4 on Q4 year ago, %)	Sterling index (Jan 2005=100)	Official Bank rate (level in Q4, %)	Oil price (Brent, \$/bbl)	House price inflation (Q4 on Q4 year ago, %)
City forecasters									
Barclays Capital	Nov	*	2.3	3.7	-	-	4.75	84.0	-
Bloomberg Economics	Sep		2.7	-	-	-	4.75	-	-
Capital Economics	Nov	*	2.3	3.6	5.5	85.2	4.75	75.0	3.9
Citigroup	Nov	*	2.5	3.6	-	-	5.10	-	-
HSBC	Nov	*	2.5	3.6	5.0	-	4.75	-	-
JP Morgan	Oct		2.6	-	-	-	4.75	-	4.0
KPMG	Nov	*	2.5	-	-	-	4.75	80.3	-
Morgan Stanley	Dec'23		2.4	3.7	3.1	-	-	-	-
Natwest Markets	Oct		2.5	3.7	4.2	-	4.75	79.0	3.6
Nomura	Sep		3.1	-	4.9	-	4.75	-	-
Pantheon	Oct		2.6	4.1	5.1	-	4.75	-	4.5
Societe Generale	Sep'23		3.3	3.8	4.5	-	4.00	97.3	4.2
UBS	Nov	*	2.4	3.6	4.6	-	4.75	-	3.7
Non-City forecasters									
British Chambers of Commerce	Nov	*	2.6	-	4.0	-	4.93	-	-
Beacon Economic Forecasting	Nov	*	2.4	3.3	4.3	84.3	4.75	80.9	4.0
CBI	June		2.3	2.6	4.4	82.0	4.50	86.6	3.0
CEBR	Nov	*	2.3	3.6	4.7	83.9	4.83	-	-
Experian Economics	Nov	*	2.3	3.5	4.3	-	5.00	80.73	0.9
EIU	Oct'23		-	-	-	-	5.25	81.5	-
Heteronomics	Nov	*	2.4	3.6	5.2	-	4.75	81.2	-
ICAEW	Sep		2.6	-	-	-	4.75	-	-
ITEM Club	Feb		2.0	1.4	2.8	81.7	4.25	-	-
Liverpool Macro Research	Nov	*	2.1	3.4	4.0	82.5	4.00	-	-
NIESR	Nov	*	2.6	4.4	4.8	-	4.92	-	-
Oxford Economics	Nov	*	2.4	3.8	5.3	84.8	4.75	80.4	3.9
OECD	Sep		-	-	-	-	-	-	-
IMF	Oct		-	-	-	-	-	-	-
Average of forecasts made in the last 3 months (excludes OBR forecasts)									
Independent			2.5	3.7	4.7	84.1	4.76	80.2	3.4
New (marked *)			2.4	3.6	4.7	84.1	4.77	80.4	3.3
City			2.5	3.7	4.9	85.2	4.78	79.6	3.9
Range of forecasts made in the last 3 months (excludes OBR forecasts)									
Highest			3.1	4.4	5.5	85.2	5.10	84.0	2823.7
Lowest			2.1	3.3	4.0	82.5	4.00	75.0	0.9
Median			2.5	3.6	4.7	84.3	4.75	80.6	3.9
OBR	Oct		2.4	3.6	5.2	-	4.79	79.5	4.0

Source: Forecasts for the UK economy: a comparison of independent forecasts No 448 (HM Treasury, November 2024).

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

Table 2.5 Savills Property Price Forecasts

	2025	2026	2027	2028	2029	5 Year
Mainstream UK	4.0%	5.5%	5.0%	4.0%	3.0%	23.4%
West Midlands	4.5%	6.0%	6.0%	4.5%	3.0%	26.4%
Mainstream UK Rents	4.0%	3.5%	3.0%	3.0%	3.0%	17.6%

Source: Savills Mainstream House Price Forecasts 2025-29 (4th November 2024)²

2.12 In this context the Nationwide Building Society reported in October 2024:

Annual house price growth slows in October

- UK house prices rose 0.1% month on month in October
- Annual growth rate slowed to 2.4%, from 3.2% in September

Headlines	Oct-24	Sep-24
Monthly Index*	529.6	529.0
Monthly Change*	0.1%	0.6%
Annual Change	2.4%	3.2%
Average Price (not seasonally adjusted)	£265,738	£266,094

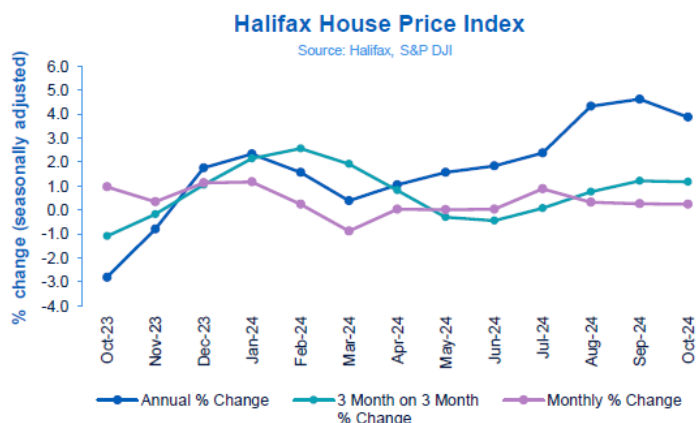
2.13 Halifax Building Society reported a similar situation in November 2024:

 Average house price £293,999	 Monthly change +0.2%	 Quarterly change +1.2%	 Annual change +3.9%
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Average house price edges up to hit record high

- House prices increased by +0.2% in October, a fourth consecutive monthly increase
- Year-on-year prices are up +3.9%, easing from +4.6% in September
- Typical property now costs £293,999, surpassing previous peak set in June 2022 (£293,507)
- Northern Ireland continues to record the strongest annual house price growth in the UK

² [Savills UK | Regional Performance in the late stages of the cycle](#)



- 2.14 There is clearly continued uncertainty in the market. The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. Sensitivity testing to changes in values has been carried out.

Changes in Development Costs

- 3.1 The build costs in the 2023 WPVA, as suggested in the PPG, were derived from the BCIS data. The cost figure for Shropshire for 'Estate Housing – Generally' was £1,359 per sqm (May 2023). The equivalent figure now (November 2024) has increased to £1,434 per sqm. This data shows that the cost of construction has increased by about 5.5% since the 2023 WPVA was undertaken.
- 3.2 There has been much coverage in the press around build cost inflation. The BCIS is predicting that, going forward, the General Build Cost Index will increase by about 3.3% over the next year (from November 2024 – 465.8 to November 2025 – 481.3) and by about 9.2% over the next three years. (from November 2024 – 465.8 to November 2027 – 508.8).
- 3.3 The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. Sensitivity testing to changes in (BCIS based) build costs has been carried out.

Changing Policy Requirements

- 4.1 In discussion with the Council, the following policy obligations were suggested in the 2023 WPVA – although it was stressed that the plan making process was ongoing, so this needed to be kept under review, and in any event, there was to be the normal political balance, to reflect local priorities, when setting Local Plan policies.
- a. Affordable Housing:
- i. Sites not in public ownership and or subject to grant, in and adjacent to Telford 20% - as 50% AHO including First Homes and the balance as Affordable Rent.
 - ii. Sites not in public ownership and or subject to grant, elsewhere 30% - as 33% AHO including First Homes and the balance as Affordable Rent.

- iii. In the above, First Homes subject to a 40% discount and a £180,000 cap.
- b. Design
 - 95% Accessible and Adaptable (M4(2)), 5% Wheelchair Accessible (M4(3)).
 - Development subject to 80% CO₂ saving as per 2025 Future Homes Standard.
 - 10% Biodiversity Net Gain.

4.2 This was caveated as follows (paragraphs 12.102, 12.103):

A key aspect of this advice is the extent of public sector ownership in and around Telford, and the Council's success in securing external funding to facilitate the delivery of housing schemes, and to ensure the delivery of affordable housing. Over the last 7 years about 60% of affordable housing has been delivered with some form of Homes England and or Council input, and 40% through market lead housing schemes.

Having said this, it will still be necessary to be cautious in assuming brownfield development or Build to Rent development would come forward, as these are not likely to be delivered, without some form of public sector intervention. This is likely to influence the selection of sites for allocation. Having said this, it is important to note that a significant number of the brownfield sites that may come forward for development are within the Council's control. The Council has a good record of securing 'gap funding' to enable the delivery of large-scale greenfield schemes and anticipates that this will continue in the future.

4.3 The 2023 WPVA update included a review of national policy requirements, including anticipated changes. Changes in national policy are considered further below. A number of Local Plan policies have been refined, these are also considered below.

Updated NPPF December 2024

4.4 The 2022 Viability Update was carried out in line with the then current NPPF. Since then, the NPPF has been updated 4 times.

- 5 September 2023 – Changes around onshore wind development.
- 19 December 2023 – Changes around the implementation of housing targets.
- 20 December 2023 – Minor corrections to the 19 December 2023 NPPF.
- 12 December 2024 – A broad update that includes a new Standard Method and changes around releasing land from the Green Belt.

4.5 The changes made do not impact on viability assessments that inform the plan-making process.

Updated NPPF, December 2024

4.6 Following the 2024 General Election, the new administration published a draft update to the NPPF. These changes were subject to period of consultation and, as this note was being completed, in December 2024, a new NPPF was published. The changes will have some significant impacts on the plan-making process, with the main changes being around the

Standard Method for deriving the need for housing and in relation to housing targets. The impact on viability is limited.

- 4.7 The 2024 NPPF includes new sections concerning realising land from the Green Belt. Such releases are subject to the 'Golden Rules' which require that the affordable housing contribution on such releases to be 15% above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%.
- 4.8 The Draft NPPF included a new Annex that concerned technical aspects of assessing viability in relation to land released from the Green Belt. This has not been carried into the new NPPF. None of the Council area is designated as Green Belt, although the southeast boundary adjoins the Birmingham Green Belt, so these changes would not apply to any of the administrative area.
- 4.9 In relation to releasing land from the Green Belt, the consultation said:

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

- 4.10 The PPG has not been updated in this regard, however the updated PPG, published with the December NPPF says:

The government intends to review this Viability Guidance and will be considering whether there are circumstances in which site-specific viability assessment may be taken into account, for example, on large sites and Previously Developed Land.

- 4.11 It will be necessary to keep this under review. In any event it is timely to note that the approach taken in the 2023 WPVA is consistent with the approach suggested in the 2024 NPPF consultation. The assumptions used in the 2023 WPVA are set out towards the end of Chapter 6.

- | | | |
|----|-------------------------|---|
| a. | Brownfield/Urban Sites: | EUV Plus 20%. |
| b. | Greenfield Sites: | Generally - EUV Plus £350,000/ha. |
| | | Sustainable Urban Extensions / Strategic Sites - EUV x 10 |

- 4.12 If a BLV of 10 times EUV was to be implemented through national policy, it may suggest that the BLV assumption used in the 2023 Viability Update of EUV (£25,000 for agricultural uses) plus £500,000 per ha was overstated, but the approach is consistent on the larger, strategic, greenfield sites.

- 4.13 The 2023 Viability Update was prepared in accordance with the then updated December 2024 NPPF.
- 4.14 The new NPPF includes several further changes, that have an impact on viability.
- a. There is a new emphasis on Social Rent, as set out in paragraph 64 of the December 2024 NPPF (and elsewhere). It is clear that some Social Rent is to be provided, and the extent of the need must be assessed.
 - b. The dropping of the requirement for 10% of all homes to be Affordable Home Ownership.
 - c. The dropping of the requirement for 25% of the affordable housing to be First Homes as per footnote 31 of the December 2024 NPPF.
- 4.15 The Council's preference is for the affordable housing mix to include an element of Social Rent. This is considered below.

Accessible and Adaptable Standards

- 4.16 The 2023 WPVA considered anticipated changes in Building Regulations, including changes to Part M which concerns accessibility. In July 2022, the Government announced the outcome of the 2020 consultation on raising accessibility standards of new homes³ saying:

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

- 4.17 The new administration has not given an indication as to whether or not it will take this forward (there is no suggestion that it will not). To take it forward, the Government will need to consult further on the technical changes to the Building Regulations before mandating the higher M4(2) accessibility standard. In any event, in the 2023 WPVA, M4(2) is assumed to apply on all units other than those built to the higher M4(3) standard (paragraph 8.43). The 2023 WPVA is up-to-date in this regard.

Environmental Standards

- 4.18 In December 2023, the previous Government launched a consultation on how national standards, in the form of the Future Homes Standard and the Future Buildings Standard, may be implemented. The costs of higher standards were considered in the 2023 WPVA. At the time of this note, no timescale has been announced for the implementation of new standards, and the new administration has not given an indication as to whether or not it wants to take

³ [Raising accessibility standards for new homes: summary of consultation responses and government response - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes)

this forward, but there is no suggestion that it will not, as part of its wider ambitions in relation to zero carbon.

- 4.19 The Local Plan requirements in this regard are considered below.

Biodiversity Net Gain

- 4.20 The Environment Act received Royal Assent in November 2021 and mandates that new developments must deliver an overall increase in biodiversity. The PPG was updated in February 2024⁴ in this regard. The requirement is that developers ensure habitats for wildlife are enhanced and left in a measurably better state than they were pre-development. Developers must assess the type of habitat and its condition before submitting plans, and then demonstrate how they are improving biodiversity.
- 4.21 Green improvements on-site are preferred (and expected), but in the circumstances where they are not possible, developers will need to pay a levy for habitat creation or improvement elsewhere.
- 4.22 The Council is now proposing to update the draft Local Plan to seek 20% BNG. The additional costs of this are considered below.

Levelling-up and Regeneration Act

- 4.23 At the end of 2023, the *Levelling-up and Regeneration Act* become law. Many of the measures in the Act will be (or may be) implemented, in due course, through secondary legislation and / or regulations. The provisions within the Act will have a significant impact on the overall plan-making process, but they do not alter the place of viability in the current Local Plan process.
- 4.24 The *Levelling-up and Regeneration Act* includes reference to a new national Infrastructure Levy. The new Government has announced, as part of the July 2024 consultation on the Draft NPPF, that this will not be taken forward. This need not be considered further.

Updated Policies in the Regulation 19 Submission Draft Plan

- 5.1 The policy testing in the 2022 WPVA was carried out based on the well-developed, but not finalised, draft of policy wordings. The findings of the 2023 WPVA informed the development of policy, and the Council has considered some policy areas in more detail. There are several policies that have been updated that have the potential to impact on viability. These are considered below.

⁴ [Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/121444/Biodiversity_net_gain_-_GOV.UK_(www.gov.uk).pdf)

Biodiversity Net Gain (BNG)

- 5.2 The base modelling in the 2023 WPVA was on the basis that the Council would introduce a 10% BNG requirement across the Council area as so to align with national policy. The approach to the modelling was set out at paragraph 8.36 of the 2022 WPVA:

It is assumed provision will be on-site on greenfield sites and off-site on brownfield sites (this approach is different to that taken in the pre-consultation report). The percentage uplift costs are used as the costs per ha/unit are a little historic.

- 5.3 As mentioned above, the Council now wishes to seek 20% BNG, however is building flexibility into the policy expressing this as an aspiration, subject to viability.
- 5.4 There are few published costs of seeking higher levels of BNG. The Council has not undertaken specific research into the costs in this regard and there are no published England wide data in this regard. Research by Kent County Council⁵ has indicated that the additional cost of providing 15% or 20% BNG is relatively modest where it can be delivered on-site:

Table 5.1 Comparison of BNG costs £ per dwelling

Typology	15% onsite per dwelling	20% onsite per dwelling	15% offsite per dwelling	20% offsite per dwelling
5,000 unit greenfield - houses	+£55.79	+£92.29	+£631.85	+£778.69
500 unit greenfield - houses	+£85.56 <i>Additional land</i>	+£216.31 <i>Additional land</i>	+£1,062.85	+£1,167.95
100 unit greenfield - houses	+£943.00 <i>Additional land</i>	+£1,071.57 <i>Additional land</i>	+£394.70	+£458.54
25 unit greenfield - houses	+£5,549.96 <i>Additional land</i>	+£5,913.31 <i>Additional land</i>	+£874.76	+£1,077.59
500 unit brownfield - houses	+£12.00	+£27.00	+£100.37	+£124.22
100 unit brownfield – houses flats	+£4.50	+£9.00	+£10.17	+£13.59
25 unit brownfield - flats	+£0.00	+£42.00	+£506.30	+£508.58

Source: Table 1 Viability Assessment of Biodiversity Net Gain in Kent (SQW & Temple, June 2022)

- 5.5 The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. The BNG cost assumption has been updated assuming that 20% BNG will cost 150% of the cost of achieving 10% BNG.

Climate Change

- 5.6 Within the 2023 WPVA a range of steps towards zero carbon were tested (from paragraph 8.60), based on the then available data. The Council's draft policy aligns with Option 1 of the

⁵ [Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf \(kentnature.org.uk\)](https://kentnature.org.uk/Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf)

December 2023 Future Homes Standard Consultation. In the final appraisals, based on the recommended policy mix, the BCIS based construction costs were increased by 7%, to reflect the cost of the Council's preferred option.

- 5.7 As set out above, this is an area where national policy has developed since the 2022 Viability Update was prepared, and a topic on which further information has been published. The Government carried out a consultation in December 2023 on how national standards, in this regard, may be implemented.
- 5.8 The Department of Levelling up, Communities and Housing introduced revisions to Conservation of Fuel and Power, Approved Document L of the Building Regulations (often referred to as the 2021 Part L standard) as a 'stepping stone' on the pathway to zero carbon homes. These set the target of an interim 31% reduction in CO₂ emissions over the 2013 standards for dwellings that apply to new homes that submit plans after June 2022 or have not begun construction before June 2023.
- 5.9 The costs of meeting the current (i.e. 2021) Part L standard depends on the specific changes made and were considered in Chapter 3 of the 2019 Government Consultation⁶. This suggests that the costs, having been indexed, would add a little less than 3% to the base cost of construction. These requirements have now been in place for a while, and whilst they are not fully reflected in the BCIS costs (the BCIS costs are based on past schemes) they are in part. Based on this information, it would now be appropriate to assume the additional costs of the increase in standards set out in 2021 Part L add 2% to the current BCIS costs.
- 5.10 The revisions to Part L of Building Regulations are a step towards the introduction of the Future Homes Standard. The Government published, in December 2023, a further consultation on the details of the implementation of the Future Homes Standard. At the same time, the then Housing Minister made a Written Parliamentary Statement⁷ that set out the Government's position in this regard as follows:

... Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:

- 7.1 *That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.*
- 7.2 *The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).*

Where plan policies go beyond current or planned building regulations, those policies should be applied flexibly to decisions on planning applications and appeals where the applicant can demonstrate that meeting the higher standards is not technically feasible

⁶ The Future Homes Standard 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings (MHCLG, October 2019).

⁷ [Written statements - Written questions, answers and statements - UK Parliament](#)

- 5.11 Whilst this direction does not preclude the introduction of policies that go beyond national standards, this does suggest that such policies will need to be well justified and subject to greater scrutiny.
- 5.12 It also set out that where standards that are higher than national standards are introduced, then they should be expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP). It is understood that the Council is updating the Draft Plan in this regard.
- 5.13 Within the 2023 WPVA, the BCIS based construction costs were increased by 7% to reflect the cost of the Council's preferred option of zero carbon development. This cost allowance is now reviewed.
- 5.14 Paragraph 6.10 of The Future Homes Standard (FHS) 2023 consultation on the energy efficiency requirements of the *Building Regulations affecting new and existing dwellings. Consultation-Stage Impact Assessment* sets out the following costs:

6.6 A summary of the impacts considered under this Impact assessment (IA) is provided below in Table 3, relative to the counterfactual – the counterfactual is the 2021 notional building specification, which has a gas boiler, lower efficiency solar panels and wastewater heat recovery, or a heat pump (see Routes to Compliance (para 5.23 - 5.25) section). This is with the exception of mid-high rise, which is an ASHP and gas boiler hybrid communal heat network. Broadly, Option 1 is a home with a heat pump and more efficient solar panels. Option 2 meets our public commitments through the use of heat pumps only. All figures are Net Present Values (NPV) over 10 years of policy and a subsequent 60-year life of the buildings. Negative NPVs are given in parenthesis and represent costs. The figures represent the aggregate impact across the building mix...

6.10. ... In 2022 prices, on a per-home basis (3-bed semi-detached), Option 1 leads to a ~£6,200 (4%) increase in upfront capital costs, whereas Option 2 only leads to a ~£1,000 (1%) increase....

Additional Capital Costs

6.16. The increase in capital costs from the proposed 2025 standards, compared with the continuation of existing 2021 standards (gas boiler and solar pv home), are shown in Table 5. Further breakdown of the costs of the different elements is provided in Appendix C.

Table 5: Additional Capital Costs* relative to 2021 Gas Boiler and Solar PV Counterfactual (£)

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

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

- 5.15 The new Government has not announced its intentions with regard to the Future Homes Standard, rather at this stage it has concentrated on reforms to the NPPF concerning the Standard Method and the overall quantum of development.
- 5.16 Separately, the *Future Homes Hub, Ready for Zero, Evidence to inform the 2025 Future Homes Standard – Task Group Report* (February 2023) was published before the Government consultation, so is testing a wider sets of options than are being considered at a national level. The following costs are estimated.

Table 5.2 Additional Costs for Options Towards Zero Carbon

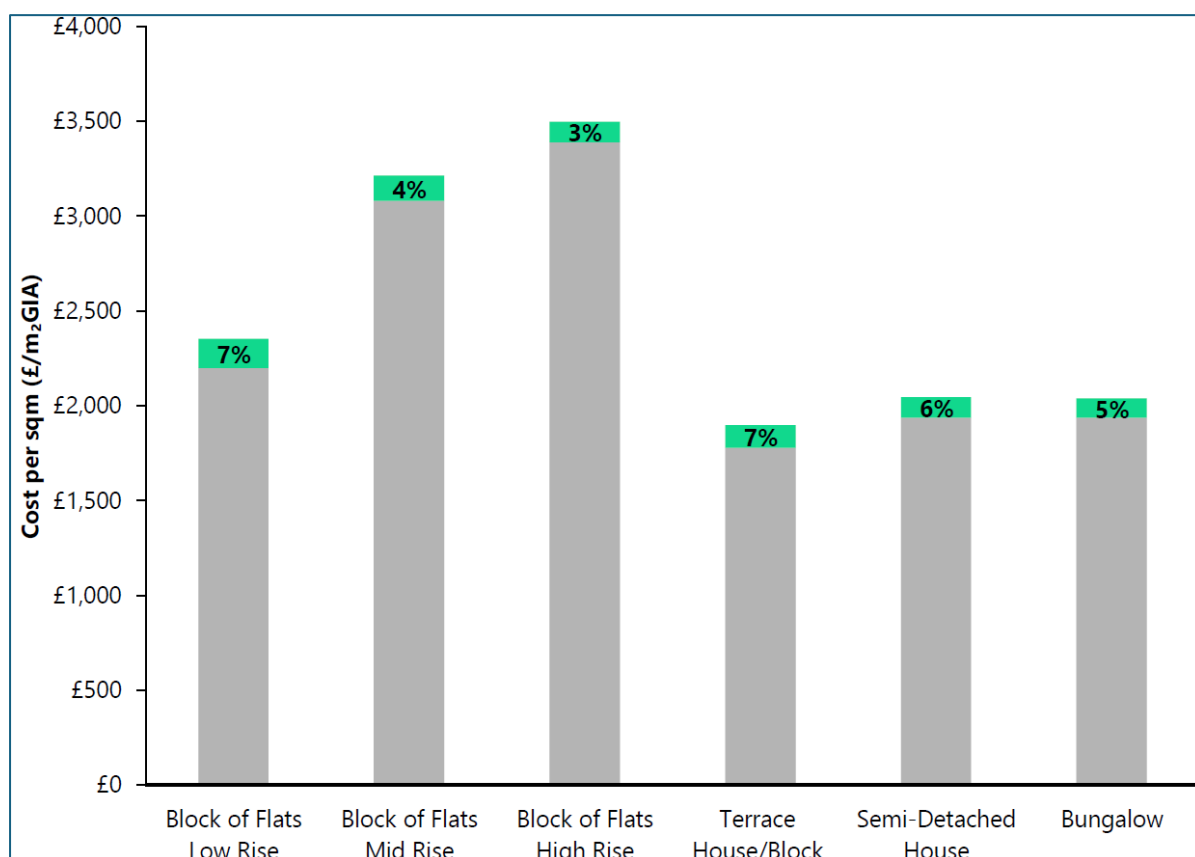
		Arcadis Cost uplift compared with Ref 2021	Arcadis Cost uplift compared with Ref 2025	Energy bills variance from Ref 2021 (£700/yr)*
CS1	to be consistent with the expectation that the Future Homes Standard home should reduce carbon emissions by a minimum of 75% from 2013	2%	-3%	Circa 190/yr more
CS2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

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

- 5.17 These costs are somewhat greater than those in the more recent Government consultation, however they predate the Government announcement and are not directly comparable.
- 5.18 Looking more widely, in July 2023 Introba Consulting Ltd produced *Essex Net Zero Policy – Technical Evidence Base*, with Currie & Brown and Etude for Essex County Council. The

report includes a section headed *Cost evidence base to inform viability testing*. This suggests the following additional costs:

Figure 5.1 Cost Uplifts of Net Zero policy energy use intensity and space heating demand limits, the total capital cost uplift over Part L 2021 Building Regulations



Graph 11.1: Domestic typologies capital cost per square meter and cost uplift % of Net Zero policy over Building Regulations Part L 2021 Notional Building.

- 5.19 It is important to note that the above costs are the costs over the 2021 Part L, and not the costs over the current BCIS Cost. As set out above, it would now be appropriate to assume the additional costs of the increase in standards, set out in 2021 Part L, add 2% to the current BCIS costs.
- 5.20 More recently *Surrey Net Zero – Economic Viability Assessment, Assessment of policy delivery* – (Three Dragons, May 2024) has been published. This sets out the costs of a range of scenarios:

- Scenario 1** The Future Homes Standard Option 1. Costings are based on the specifications in the Government consultation (December 2023) for Option 1.
- Scenario 2** The Future Homes Standard Option 2. Costings are based on the specifications in the Government consultation (December 2023) for Option 2.
- Scenario 3** 100% improvement on the building regulations Target Emissions Rate. Costings are based on the Future Homes Standard consultation specification Option 2 for fabric and services with added solar PV (photovoltaics) to achieve

a 100% reduction in carbon emissions as calculated by the building regulations methodology SAP 10.

Scenario 4 Net Zero (Low energy). Space heating demand less than 30 kWh/m²/yr.

Scenario 5 Net Zero (Ultra low energy). Space heating demand less than 15-20 kWh/m²/yr.

- 5.21 It is important to note that the following costs are the costs over the 2021 Part L, and not the costs over the current BCIS Cost. This has been discussed with the authors of the report (Three Dragons) and it was noted that the additional cost of the current Part L requirements would vary across the house types. They suggest, it would now be appropriate to assume the additional costs of the increase in standards set out in 2021 Part L add 2.8% to the current BCIS costs.

Table 5.3 SCC Costs of Net Zero Scenarios

	Scenario 0:	Scenario 1:	Scenario 2:	Scenario 3a:	Scenario 4:	Scenario 5:
	Part L 2021	Future Homes Standard - Option 1	Future Homes Standard - Option 2	100% better than FHS (Option 2) - DER to 0 in SAP 10	Net Zero (Low energy)	Net Zero (Ultra Low energy)
Detached house	2.80%	5.08%	-0.22%	4.69%	4.61%	9.31%
Semi-detached	2.80%	5.97%	-0.18%	6.73%	6.03%	10.59%
Terrace house	2.80%	6.35%	-1.02%	5.56%	5.30%	9.25%
Low Rise	2.80%	4.24%	1.51%	4.86%	6.87%	8.56%
Mid Rise	2.80%	3.52%	1.50%	2.91%	4.76%	5.94%
High Rise	2.80%	3.00%	1.87%	2.30%	3.59%	4.85%

Source: Surrey Net Zero – Economic Viability Assessment, Assessment of policy delivery – (Three Dragons, May 2024)

- 5.22 The Council's preferred option aligns with Scenario 1 (Future Homes Standard - Option 1). The costs of implementing this is somewhat less than the costs used for Zero Carbon in the 2023 WPVA.
- 5.23 The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. The cost assumption has been updated to 6%.

- 5.24 As noted in the 2023 WPVA (Paragraph 8.873), building to higher standards that result in lower running costs results in higher values^{8 9 10 11}, although no premium was assumed in the 2023 WPVA or in this note, and it is difficult to robustly quantify.

Costs of Strategic Infrastructure and Mitigation

- 5.25 In the 2023 WPVA, the following assumptions were used in relations to strategic infrastructure and mitigation costs:

- Sites of less than 10 units £1,000 per unit.
- Sites of 10 to 50 units £2,500 per unit
- Sites of more than 50 units £4,000 per unit
- Potential Sustainable Urban Extensions £15,000 per unit.

- 5.26 The Council has advised that these remain appropriate. The final section of this note includes a further set of appraisals based on these costs.

Affordable Housing – Requirement and Mix

- 5.27 The policy in the draft Local Plan seeks:

Policy HO4 - Affordable housing requirements

1. *All major residential developments (as defined in national policy) will look to maximise affordable housing delivery and be required to deliver a minimum of:*
 - a) *25% affordable homes in the Telford built-up area; and*
 - b) *35% affordable homes in Newport and the rural area*
2. *The council will, as per NPPF requirements, secure a tenure mix across both affordable housing for rent and affordable home ownership tenures including First Homes. The tenure mix should be identified through discussions with the local authority, and informed by the latest Government guidance.*
3. *Developments providing affordable housing above these targets (up to 100%) will be supported where it meets local housing needs, creates mixed and balanced communities and conforms to other relevant policies within the Local Plan.*
4. *Developments that do not meet the policy requirements must provide a clear justification supported by a viability assessment.*

⁸ See *EPCs & Mortgages, Demonstrating the link between fuel affordability and mortgage lending* as prepared for Constructing Excellence in Wales and Grwp Carbon Isel / Digarbon Cymru (funded by the Welsh Government) and completed by BRE and *An investigation of the effect of EPC ratings on house prices* for Department of Energy & Climate Change (June 2013.)

⁹ [A Green Premium: House buyers willing to pay almost 10 per cent more for energy efficient properties | Santander UK](#)

¹⁰ [Legal & General research shows buyers will pay up to 20% premium for low carbon homes | Legal & General \(legalandgeneral.com\)](#)

¹¹ [Savills UK | The cost and premium for new eco-homes](#)

5.28 The supporting text to Policy HO5 - Affordable housing delivery says:

Affordable housing is expected to be delivered on-site and based on evidence in the EHDNA should comprise 80% affordable rent or social rent, and 20% intermediate (including shared ownership).

5.29 These policies do not align with the findings of the 2023 WPVA that suggested:

- Sites not in public ownership and or subject to grant, in and adjacent to Telford 20% - as 50% AHO including First Homes and the balance as Affordable Rent.
- Sites not in public ownership and or subject to grant, elsewhere 30% - as 33% AHO including First Homes and the balance as Affordable Rent.
- In the above it was assumed that First Homes be subject to a 40% discount and a £180,000 cap.

5.30 It is important to highlight that, in the 2023 WPVA, that the Telford price area includes the sites adjacent to Telford and not just those within the built-up area as set out in the draft policy.

5.31 No specific recommendation was made in relation to the sites in public ownership and / or those coming forward with public sector funding. Such sites have historically delivered the bulk of affordable housing, and the requirements determined by the Council on a site-by-site basis.

5.32 The 2023 WPVA recommends 20% affordable housing; however, the Council's affordable housing policy sets a target of 25% for Telford and 35% for Newport and the rural area. Telford & Wrekin Council believes that the affordable housing requirements are appropriate for the Local Plan, as around 60% of the Council's affordable housing delivery is achieved through Homes England grant funding, rather than through S106 agreements. In addition to this, the Local Plan supports the delivery of 100% affordable housing schemes, which the Council actively seeks to secure through working with local registered providers.

5.33 As set out above, the Council's preference is for all Affordable Home Ownership housing to be delivered as Shared Ownership rather than First Homes, and for the affordable housing for rent to include Social Rent, and thus come into alignment with the July 2024 Draft NPPF consultation.

5.34 The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. The affordable housing mix has been updated to reflect that the Council's preference is for all Affordable Home Ownership housing to be delivered as Shared Ownership rather than First Homes and for half of the affordable housing for rent to be Social Rent.

Accessible and Adaptable Standards

5.35 Within the 2023 WPVA it was assumed that 95% of new homes would be Accessible and Adaptable (M4(2)), and that 5% of new homes would be Wheelchair Accessible (M4(3)). The Council has advised that it wishes to move to 3.5% of market housing and 5% of affordable

housing to be to Wheelchair Accessible M4(3)a standard. The need for Accessible and Adaptable (M4(2)) has been quantified as 20% of market housing and 45% of Affordable Housing.

- 5.36 As set out in the 2023 WPVA (paragraph 8.78), when considered on a per unit basis, the cost of providing Wheelchair Adaptable housing is £14,155 per unit, and providing Accessible and Adaptable housing is £730 per unit.
- 5.37 The final section of this note includes a further set of appraisals, however no change is made in this regard the modelling Accessible and Adaptable M4(2) as it is anticipated that Building Regulations will mandate M4(2) Accessible and Adaptable in the medium term. The Wheelchair Accessible M4(3)a has been updated to align with these updated requirements.

Summary and Conclusions

- 6.1 HDH Planning & Development Ltd produced the 2023 WPVA. The study was commissioned to support the development of the Local Plan review. The report was undertaken in line with the requirements set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG).
- 6.2 Since the 2023 WPVA was completed, the costs and the values, being the main inputs into a viability assessment, have changed and several changes have been made to national policy. The Council has also refined some of the policies in the draft Local Plan. This note considers how these changes may impact on viability and whether it is necessary for the Council to fully update the viability evidence before proceeding.
- 6.3 The value of newbuild housing and the costs of construction have both increased since the 2023 WPVA was undertaken. The Land Registry data suggests newbuild values have increased by about 20% and analysis of newbuild sales suggest an increase of 11%. Newbuild asking prices (for flats only) have increased, but only marginally. The BCIS suggests that build costs have increased by 5.5%. Values have increased more than costs, suggesting viability has improved since 2022.
- 6.4 House price forecasts and build costs forecasts suggest that house prices are likely to continue to increase at a broadly similar rate to that of build costs, providing comfort. All other things being equal, the 2022 WPVA remains up-to-date and is the appropriate document to support the next stage of the plan-making process.
- 6.5 There have been a number of changes to national policy and to the draft Local Plan since the 2022 WPVA was completed.
- 6.6 Sections 10.55 to 10.57 of the 2023 WPVA considered the impact of changes in costs and values on the preferred set of policies, based on further appraisals that were summarised in Appendix 19 of the report. This analysis has been repeated based on the following changes.
- a) The values are increased by 10% and the construction costs rebased to the latest BCIS costs.

- b) Biodiversity Net Gain is assumed at 20%, based on a cost of 150% of implementing 10% BNG.
- c) The Cost of FHS Option 1 has been updated to plus 6% for housing and plus 4% for flatted development.
- d) The Wheelchair Accessible M4(3)a has been updated to 3.5% of market housing and 5% of affordable housing. The balance of the housing is assumed to be Accessible and Adaptable (M4(2)).
- e) The affordable housing mix has been updated to reflect the Council's preference is for all Affordable Home Ownership housing to be delivered as Shared Ownership rather than First Homes and for half of the affordable housing for rent to be Social Rent. (Telford and Adjacent – 25% affordable as 40%, Social Rent, 40% Affordable Rent, 20% Shared Ownership, Newport and Rural - 35% affordable as 40%, Social Rent, 40% Affordable Rent, 20% Shared Ownership).

6.7 The sensitivity testing is based on the full policy-on scenario of 25% affordable homes in (and adjacent to the Telford built-up area; and 35% affordable homes in Newport and the rural area. Sensitivity testing is carried out on varied amounts of affordable housing and with 10% Social rent rather than 40% Social Rent.

6.8 Price change scenarios and cost change scenarios have been tested. In this analysis, as set out in **Appendix 1** to this note, are directly comparable to those presented in Appendix 15 of the 2023 Viability Update. **Appendix 2** to this note includes the scenario with the proportion of Social Rent reduced to 10% of the affordable housing.

6.9 The results confirm that the 35% affordable housing policy is appropriate in Newport and the rural areas. Based on the viability evidence, it is recommended that the Council adopts the 20% affordable housing requirement in and adjacent to Telford, as recommended in the 2023 WPVA.

6.10 The results in relation to the Sustainable Communities are similar to those reported in the 2023 WPVA. On these, the Residual Value exceeds the EUV, but on most it is a little less than the BLV, suggesting that these are likely to be challenging to deliver with 20% affordable housing. The delivery of any large site is challenging. Regardless of these results, it is recommended that the Council engages with the owners in line with the advice set out in the Harman Guidance (page 23):

Landowners and site promoters should be prepared to provide sufficient and good quality information at an early stage, rather than waiting until the development management stage. This will allow an informed judgement by the planning authority regarding the inclusion or otherwise of sites based on their potential viability.

6.11 In this context paragraph 10-006 of the PPG is particularly re-iterated:

... It is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. It is important for developers and other parties buying (or interested in buying) land to have regard to the total cumulative cost of all relevant policies when agreeing a

price for the land. Under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan....

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- 6.12 The results of the second scenario (in Appendix 2), with the proportion of Social Rent reduced to 10% of the affordable housing are somewhat better with the Residual Values being higher. This is to be expected as Affordable Rent has a higher value than Social Rent. This analysis highlights the importance of, where viability is a constraint on the delivery of a policy compliant scheme, that consideration is given to the tenure mix as well and the amount of affordable housing and wider planning obligations.
- 6.13 A key characteristic of the Council area, and particularly within Telford, is the extent of public sector ownership, and the Council's success in securing external funding to facilitate the delivery of housing schemes, and to ensure the delivery of affordable housing. Over the last 7 years, about 60% of affordable housing has been delivered with some form of Homes England and or Council input, and 40% through market led housing schemes. As set out above, the Council believes that the affordable housing requirements in the Draft Plan are appropriate as around 60% of the Council's affordable housing delivery is achieved through Homes England grant funding, rather than through S106 agreements. In addition to this, the Local Plan supports the delivery of 100% affordable housing schemes, which the Council actively seeks to secure through working with local registered providers.
- 6.14 It will still be necessary for the Council to be cautious in assuming brownfield development generally and greenfield development in and around Telford would come forward, as these are not likely to be delivered at the proposed levels of affordable housing, without some form of public sector intervention. As emphasised, it is important to note that a significant number of such sites, particularly the brownfield sites, that may come forward for development, are within the Council's control. The Council has a good record of securing 'gap funding' to enable the delivery of large-scale greenfield schemes and anticipates that this will continue in the future.

RS Drummond-Hay MRICS
HDH Planning & Development Ltd
20th December 2024

Appendix 1 Sensitivity Testing based on Full Policy Requirements

Telford & Adjacent

[illegible]

					BLV Residual Value															
			EUV		0%	5%	10%	15%	20%	25%	30%	35%	40%							
					</															

Newport & Rural

			BCIS Value	EUV	BLV/Residual Value															
					+15%	+10%	+5%	+0%	-15%	-10%	-5%	0%	+5%	+10%	+15%					
			Newport & Rural	25 000	375,000	337,247	444,295	550,645	656,995	384,208	525,602	656,995	788,389	919,783	1,050,432					
			Newport & Rural	25 000	375,000	429,041	560,396	691,752	823,107	497,301	660,204	823,107	986,009	1,146,779	1,306,885					
			Newport & Rural	25 000	375,000	557,077	719,731	882,385	1,045,039	639,217	842,128	1,045,039	1,247,950	1,448,137	1,647,924					
			Newport & Rural	25 000	375,000	-87,589	90,861	262,783	434,705	67,857	251,281	434,705	618,129	801,553	984,977					
			Newport & Rural	25 000	375,000	-98,642	76,303	244,044	411,059	57,048	234,727	411,059	587,390	763,722	940,054					
			Newport & Rural	25 000	375,000	-108,905	139,581	378,682	615,730	107,912	363,478	615,730	867,982	1,120,233	1,372,485					
			Newport & Rural	50 000	400,000	-17,090	312,962	633,899	948,455	249,713	603,759	948,455	1,293,151	1,637,847	1,982,543					
			Newport & Rural	50 000	400,000	266,283	519,366	768,014	1,010,752	445,338	732,042	1,010,752	1,289,461	1,568,171	1,846,880					
			Newport & Rural	50 000	400,000	150,353	369,297	588,242	804,011	84,509	325,401	566,294	804,011	1,040,249	1,270,710	1,500,293				
			Newport & Rural	50 000	400,000	142,819	395,450	648,081	900,698	61,647	341,336	621,024	900,698	1,174,982	1,449,266	1,717,252				
			Newport & Rural	1 000 000	1 200 000	-74,314	107,553	282,514	455,107	-106,621	87,969	272,722	455,107	634,136	813,165	992,193				
			Newport & Rural	1 000 000	1 200 000	-67,438	141,847	340,804	539,761	-106,318	117,976	328,868	539,761	750,387	955,758	1,161,130				
			Newport & Rural	1 000 000	1 200 000	-1,037,381	-731,480	-429,204	-132,052	-962,665	-681,305	-404,117	-132,052	132,631	387,171	641,711				
			Newport & Rural	1 000 000	1 200 000	-1,118,666	-798,711	-483,056	-171,741	-1,029,077	-738,747	-453,074	-171,741	103,513	369,364	631,695				
			Newport & Rural	1 000 000	1 200 000	-4,375,695	-3,913,258	-3,450,822	-2,988,385	-3,850,391	-3,563,055	-3,275,720	-2,988,385	-2,701,049	-2,416,808	-2,134,761				
			Newport & Rural	1 000 000	1 200 000	-1,469,166	-1,098,568	-728,985	-359,401	-1,325,497	-1,002,405	-680,903	-359,401	-48,211	261,566	567,548				
			Newport & Rural	1 000 000	1 200 000	-1,811,569	-1,594,394	-1,379,198	-1,164,781	-1,615,219	-1,463,494	-1,313,713	-1,164,781	-1,015,849	-866,916	-717,984				
			Newport & Rural	1 000 000	1 200 000	-1,072,575	-749,852	-427,648	-111,978	-999,754	-700,618	-403,031	-111,978	174,756	461,490	744,635				
			Newport & Rural	1 000 000	1 200 000	-4,294,205	-3,786,043	-3,277,881	-2,769,719	-3,827,308	-3,474,778	-3,122,249	-2,769,719	-2,418,349	-2,072,308	-1,726,267				
			Newport & Rural	1 000 000	1 200 000	-765,729	-436,938	-114,932	202,329	-719,970	-406,432	-98,773	202,329	504,432	806,534	1,103,777				
			Newport & Rural	25 000	375,000	-1,615,678	-1,343,466	-1,071,255	-800,790	-1,531,069	-1,287,060	-1,043,062	-800,790	-561,272	-321,755	-87,599				
			Newport & Rural	1 000 000	1 200 000	-2,416,190	-2,075,178	-1,734,166	-1,393,154	-2,253,503	-1,966,677	-1,679,916	-1,393,154	-1,066,694	-825,210	-543,726				
			Newport & Rural	1 000 000	1 200 000	-6,134,274	-5,521,934	-4,914,308	-4,308,891	-5,563,349	-5,141,317	-4,723,156	-4,308,891	-3,894,627	-3,480,362	-3,066,098				

			EUV	BLV	Residual Value													
					0%	5%	10%	15%	20%	25%	30%	35%	40%					

Appendix 2 Sensitivity Testing based on Full Policy Requirements but with 10%, Social Rent, 70% Affordable Rent, 20% Shared Ownership

Telford & Adjacent

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			EUV	BLV	Residual Value																	
					0%	5%	10%	15%	20%	25%	30%	35%	40%									
			Telford	25,000	375,000	950,403	877,355	804,307	731,259	658,211	585,163	512,115	439,067	366,019								
			Telford	25,000	375,000	1,184,133	1,094,662	1,004,340	914,019	823,697	733,375	643,053	552,731	462,409								
			Telford	25,000	375,000	1,499,100	1,387,065	1,273,933	1,160,801	1,047,670	934,538	821,407	708,275	595,144								
			Telford	25,000	375,000	781,971	688,804	595,637	502,470	409,304	316,137	222,970	129,803	35,907								
			Telford	25,000	375,000	767,067	674,665	582,263	489,862	397,460	305,059	212,657	120,256	25,002								
			Telford	25,000	375,000	1,106,282	976,482	846,682	716,882	587,082	457,282	327,483	197,253	62,434								
			Telford	50,000	400,000	2,470,656	2,260,007	2,049,359	1,838,710	1,628,062	1,417,413	1,206,765	996,116	785,468								
			Telford	50,000	400,000	2,276,883	2,101,500	1,926,118	1,750,736	1,575,353	1,399,971	1,224,589	1,049,206	873,824								
			Telford	50,000	400,000	1,947,780	1,791,568	1,635,355	1,479,143	1,322,931	1,166,718	1,008,740	848,000	687,259								
			Telford	50,000	400,000	2,161,140	1,989,641	1,818,143	1,646,645	1,474,426	1,297,957	1,121,487	945,018	765,959								
			Telford	1,000,000	1,200,000	1,256,162	1,146,287	1,036,413	926,539	816,664	706,790	596,915	487,041	377,167								
			Telford	1,000,000	1,200,000	1,467,766	1,341,203	1,214,639	1,088,076	961,513	834,950	707,256	577,558	447,861								
			Telford	1,000,000	1,200,000	935,015	790,444	645,873	501,302	356,731	212,160	66,649	-84,912	-236,605								
			Telford	1,000,000	1,200,000	958,069	806,240	654,411	502,581	350,752	198,529	40,621	-118,688	-277,996								
			Telford	1,000,000	1,200,000	-2,129,566	-2,241,046	-2,352,526	-2,464,005	-2,575,485	-2,687,927	-2,802,002	-2,916,076	-3,030,151								
			Telford	1,000,000	1,200,000	1,095,584	903,424	711,263	516,034	317,187	115,560	-86,066	-287,692	-495,780								
			Telford	1,000,000	1,200,000	-884,004	-920,322	-956,640	-992,958	-1,029,275	-1,065,593	-1,101,911	-1,138,229	-1,174,547								
			Telford	1,000,000	1,200,000	1,165,804	996,252	823,487	649,020	472,820	294,915	117,010	-60,894	-238,799								
			Telford	1,000,000	1,200,000	-2,121,175	-2,204,249	-2,287,324	-2,370,399	-2,453,473	-2,536,548	-2,621,199	-2,706,869	-2,792,539								
			Telford	1,000,000	1,200,000	1,479,130	1,308,219	1,135,842	963,466	789,788	614,015	438,242	262,469	86,696								
			Telford	25,000	375,000	-800,790	-800,790	-800,790	-800,790	-800,790	-800,790	-800,790	-800,790	-800,790								
			Telford	1,000,000	1,200,000	-1,393,154	-1,393,154	-1,393,154	-1,393,154	-1,393,154	-1,393,154	-1,393,154	-1,393,154	-1,393,154								
			Telford	1,000,000	1,200,000	-4,308,891	-4,308,891	-4,308,891	-4,308,891	-4,308,891	-4,308,891	-4,308,891	-4,308,891	-4,308,891								

Newport & Rural

		BCIS Value	EUV	BLV Residual Value																	
				+15%	+10%	+5%	+0%			-15%	-10%	-5%	0%	+5%	+10%	+15%					
		Newport & Rural	25,000	358,813	465,264	571,614	677,965			282,841	415,177	546,571	677,965	809,358	940,752	1,071,088					
		Newport & Rural	25,000	375,000	586,208	717,563	848,918			360,210	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112	686,015	848,918	1,011,821	1,172,147	1,332,253					
		Newport & Rural	25,000	375,000	589,242	715,896	848,918			368,156	523,112										

			EUV	BLV	Residual Value												
					0%	5%	10%	15%	20%	25%	30%	35%	40%				
					</												