



Dear Ms Heavey

I apologise for wrongly addressing your as Mr in previous correspondence.

However, I make no apology for continuing to submit more detailed objections to this development proposal. The applicant has been working on these plans for over 3 years with a large team of professional advisers and has held at least five meetings with your department to discuss its proposals. The application documents run to hundreds of pages. In contrast, we were kept completely in the dark for over two years, are dealing with it in our spare time, have had not even a formal acknowledgement of our objections or our FOI request from your department and are still being handicapped by the applicants' refusal to observe the Freedom of Information Act.

This email addresses two main points. The first is the viability evidence submitted by the applicant. This is an area in which I have some professional expertise being an FRICS, a consultee to the RICS practice note on the subject and a sometime Expert Adviser to the Planning Service. I have also run workshops for RTPI, PAS and POS on the subject.

In our main statement of objection, I pointed out that the applicant's viability calculations did not comply with the NPPF. You know that we asked for a copy of the submitted viability appraisal which HASC withheld. Your own legal department has now conceded that this was wrong but has supplied a copy with all the numbers redacted. Our appeal to the Information Commissioner still stands. However, even without the numbers, it is clear to us that the viability appraisal confirms our argument. On Page 9, the applicants admit that their appraisal is not NPPF compliant. They then go on to say that in their own calculations on the value of the affordable housing units, "no capital receipt is included as the the council does not capitalise the future revenue streams".

This is patent nonsense - it does not comply with NPPF or CIPFA guidance and I have written to your internal auditor to point out that this is an unsound basis for an investment decision.

I have been able to estimate the likely value of the affordable housing by using the council's own GVA viability assessment for CIL, which ascribes an average value of £89,000 per unit. On this basis, 50 units would be worth just under £4.5m. (There would need to be adjustments for single bed units and for the ground rents of the market flats). The Planning Statement Page 49 says "The approach that has been taken to viability in this scheme is that, as a 'Council's own development', a straightforward balance is sought between development values and development costs (which include affordable housing and planning obligations)." This is completely untrue.

When we do obtain the detailed numbers in the appraisal, we will be making a comparison between the assumptions in it and the assumptions in the council's CIL viability work. It would be unfortunate for the council's credibility if there was a discrepancy.

Our second point relates to Para 5.55 of the Planning Statement which says "Although the proposed Aspen Court building will be closer to the boundary of the Parkhill and Upper Park Conversation Area, the proposed building will be significantly lower than the existing building. As noted above, although the building will appear slightly higher in perspective, it is considered that this will not create an undue impact

on the properties on Parkhill Road, particularly given the screening provided by the major trees that are being retained at this boundary and the distance of the properties from the development (32m at their closest)."

It seems that the planning consultants are unaware that deciduous trees shed their leaves in the autumn. Accordingly I attach a photomontage showing the before and after impact of the development on the Conservation Area. The photograph was taken yesterday and the superimposed building is as close as I can get to the perspective on Page 53/54 on the Design and Access Statement. Clearly the impact on the Conservation Area is much greater than the Planning Statement implies.

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Regards

Dominic Williams

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