

24 April 2017

Appeal Statement

Northern Heights, 1 Trinity Walk, NW3 5SQ

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1 Introduction

1.1

This Appeal Statement has been prepared in support of a planning appeal against the refusal by the London Borough of Camden of planning application 2016/4662/P under Section 106A (3) to modify a legal agreement and remove clause 4.1 (car free housing) of the S106 associated with planning permission ref. 2009/4045/P dated 13/07/2010 (for the erection of a new 2 story, plus basement single dwelling house to the rear of 106 Finchley Road).

1.2

This Appeal Statement sets out my case as the Appellant in support of the proposed modification of the legal agreement and the removal of clause 4.1 from the S106 agreement.

1.3

This Statement should be read in conjunction with the Appendix documents and reports which accompany this Appeal submission as follows:

- Planning officer delegated report and notice;
- Email correspondence records;
- Parking Study prepared by Transport and Traffic Consultancy;
- Various loan redemption certificates and loan term documents.

1.4

This Statement provides a description of the Appeal case and an assessment of the proposals in relation to planning policy and other material considerations as set out in the Contents of this Statement.

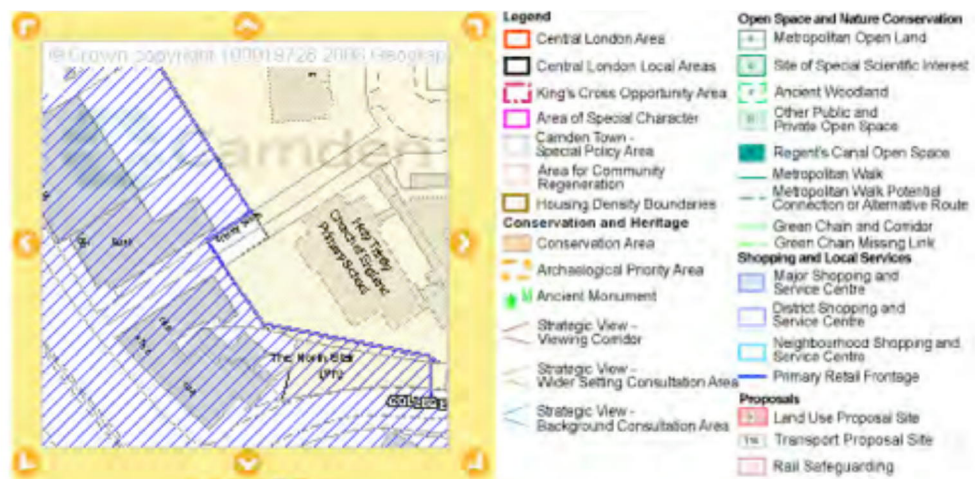
2 Site and Surroundings

2.1

1 Trinity Walk is a new build detached single family residential dwelling house which was built as a self build by the owner and appellant, and completed in mid 2015. The house lies on the north side of Trinity Walk; a broad pedestrian walkway link between Maresfield Gardens and the A41 Finchley Road. Previously, the site formed the unused back land to the rear of 106 Finchley Road, which is in commercial use at lower level and in residential use at higher levels. There is no direct road access to the house, with the steep gradient of the Trinity Walk public walkway being the sole means of access.

2.2

The house is located just outside the Fitzjohn's/Netherhall Conservation area. It is on the edge of an area designated in Camden UDP as a major shopping area.



2.3

The house is well served by public transport, being shown as a borderline PTAL 5 rating, with bus stops less than 5 minutes walk away on both Finchley Road and Finsjohn's Avenue. Underground and Overground railway stations at Finchley Road and Finchley Road & Frognal are also a 5 minute walk away.



2.4

Trinity Walk acts as a transition between the busy commercial Finchley Road and the quiet residential Maresfield Gardens. Immediately opposite the house on Trinity Walk is the playground of the Holy Trinity CofE Primary School, and to the south west is the rear of 106 Finchley Road, with the Finchley Road commercial area and transport links beyond this. To the North East is Maresfield Gardens which is mainly residential property characterised by large single Victorian dwelling houses.

2.5

Maresfield Gardens and the roads within the vicinity of the house benefit from off road private parking accessed by crossovers from the highway. The on-street parking in the adjacent residential area is almost all resident permit only bays. The south section of Maresfield Gardens has pay and display ticket or pay by phone parking bays which are directly adjacent to the large South Hampstead High School and Sir Thomas Moore church.

3 Proposals

3.1

The house sits within the Controlled Parking Zone (CPZ) CA-B (Belsize), and so is subject to parking controls under its traffic order. It is proposed to remove a restrictive planning condition attached to the current planning permission debarring occupants of 1 Trinity Walk from eligibility for residents on-street parking permits.

3.2

The removal of this condition was subject to a planning application (2016/4662/P) which was refused on the grounds of alleged impact on on-street parking levels, the reduced availability of parking for local residents and the detrimental effect on the Council's wider sustainable transport objectives.

3.3

To assess on road parking, an independent parking study (see Appendix 1 - Transport and Traffic Consultancy Parking Study) had been commissioned to determine the degree of on-street parking pressure in the vicinity of the house during peak periods of residential parking demand. The survey has been carried out by a highly qualified individual, who has been familiar with the local area for over 40 years, is a Chartered Member of the Institute of Logistics and Transport, and is a Member of the Chartered Institution of Highways and Transportation. The parking survey had been carried out in accordance with the Lambeth Council prescribed methodology.

3.4

To further understand and provide evidence of the financial unviability of this self build development, detailed financial loss information, which was not provided or substantiated in the most recent planning application is now provided. This information consists of loan valuation records, loan interest redemption statements and records of reductions in sales price. An explanation of the impact of the financial loss is also provided, showing losses and falls in value significantly in advance of the 1.89% reduction in gross development value Camden Council's research states occurs as a result of lack of on road parking.

4 Planning History

4.1

2009/4045/P - Erection of a new 2 story, plus basement single dwelling house to the rear of 106 Finchley Road. Granted 13/07/2010 subject to S106 Legal Agreement stipulating in section 4.1 that the development must be car free.

4.1

2016/4662/P - Application under Section 106A (3) to modify a legal agreement and remove clause 4.1 (car-free housing) of the S106 associated with planning permission ref. 2009/4045/P dated 13/07/2010 (for erection of a new 2 story, plus basement single dwelling house to the rear of 106 Finchley Road). Refused Section 106A application (see Appendix 2 - Delegated Officer Report). The Council sites reason for refusal is that the application conflicts with policies CS11, DP17, DP18 and DP19.

5 The On Road Parking Survey

5.1

One of the main reasons for the refusal to remove the S106 condition in the planning application was the potential impact on already high on-street parking pressure, and the consequential unacceptable conditions for surrounding residents.

5.2

To test this, an on road location specific parking study was commissioned to record and test on road parking conditions in the locality. The independent study has been undertaken in accordance with the established Lambeth parking pressure assessment methodology, with additional survey samples collected during weekday school term times.

5.3

The parking survey confirms that parking pressure in the residents permit bays closest to the house are well below serious stress levels. **The survey shows how, in the bays closest to the house, that if the house had on-road parking permits for more than one car, that this would cause no parking or sustainability problems in the locality whatsoever.**

5.4

Camden Council say they refute (they actually mean dispute, and/or refuse to agree) with the results of the independent survey, as they refer to ten years worth of on-road parking data that shows parking demand in the locality of 1.10. This means that there are 110 parking permit holders for every 100 on-street CPZ parking spaces. The council argues that a 'spot check' survey has limited weight in overcoming Council policy in the assessment of parking stress.

5.5

Subsequent to the refusal of the planning application, a request was made to view the ten years worth of parking data Camden Council refer to. The Principal Transport Planner at Camden Council has stated via email (see Appendix 3 - Council Correspondence) that the Council keeps records of numbers of permits issued in all controlled parking zones. In relation to the specific request for ten years of worth of data for parking in the CA_B CPZ, the Council have provided a link to an Annual Parking Report dated 2007, which details parking permits issued in the the CA_B zone for years 2006 and 2007 only.

5.6

This response to the information request proves that Camden Council, in fact, has no parking data (as it claimed) spanning ten years that contradicts the submitted parking survey. Rather, it has relied solely on misleading, seriously out-of-date data of existing permits issued across the whole CA-B zone. The Council has no detailed survey evidence of parking pressure in the Maresfield Gardens CPZ area adjacent to the house, and has made no attempt to geographically disaggregate their data to meaningfully identify permits issued to residents in the streets within reasonable walking distance of the property. The Council also has no evidence of what on-street parking is like in the locality during the day or night, and has not found out or assessed this before refusing this application.

5.7

By refusing the application and relying on misleading and inadequate data, the Council has failed to acknowledge that the number of permits issued in a zone is not a reliable indicator of the number of residents' cars likely to be parked on-road. The CA-B zone is the largest in the Borough of Camden, and parking and housing densities are not equal.

5.8

The Maresfield Gardens location is unique in that it is adjacent to a town centre and has a large supply of private, off-road parking. Residents benefit from many destinations they can travel to by car to within this larger than average parking zone. Maresfield Gardens and the adjacent roads have many off-road parking forecourts where residents still have a parking permit so that they can travel and park at other destinations within the CA-B zone.

5.9

This is in contrast to the eastern part of the CA_B CPZ where properties are generally smaller and denser with limited or no off-road parking. This increases the dependency and pressure on on-road CPZ parking, and makes the Council's reliance on CA-B wide parking densities misleading as the zone is not uniform in its parking uptake.

5.10

The inadequate and misleading data of permits issued also fails to recognise that while new residents in a CPZ will normally be quick to apply for parking permits, residents moving out of the CPZ will not often relinquish their permits promptly or at all until the permit expires. Additionally, even during school term time, a significant portion of permit-holding residents are likely to be away with their cars on holiday, business trips or other purposes.

6 Verification of Financial Loss

6.1

As a direct result of the lack of CPZ on-road permitted parking, there has been a significant reduction in the value of the house, which was not anticipated when the S106 was signed and the development funding arrangements were made. This has made this construction, which was originally intended to be a self build development, uneconomic and potentially non-viable long term. This challenges the UK Government's emphasis on support for community builders and is against the current drive for sustainable communities.

6.2

This section provides background evidence to show the full extent of the financial loss incurred as a result of the fall in the value of the home due to lack of CPZ on road parking, and seeks to highlight the misgivings in the objectives of the The Camden Local Plan Evidence Report for Car-Free Development (February 2016).

6.3

Reduced demand from car owning families who would normally occupy a single detached dwelling house of this nature has been the major contributor to the reduction in the advised sales value, falling by [REDACTED] from [REDACTED] to [REDACTED]

6.4

See in the Appendix 4 - Instruction letter New House, Trinity Walk 19.03.14 which details the sales agent guide price of [REDACTED] used at this time. See also Appendix 5 - MA Letter 03.03.14 which details a sales agent guide price of [REDACTED]. See also Appendix 6 - [REDACTED] 12.05.14 which details a reduction in guide price to [REDACTED]. These letters show how price was guided and expected to be [REDACTED]. All construction borrowings were in accordance with this expected valuation. See the Appendix 7 - [REDACTED] 1 Trinity Walk [REDACTED], which details the [REDACTED] forecasted valuation, the actual [REDACTED] loan valuation, and comments on the financial impact of the reduced sales value appeal due to the lack of parking.

6.5

This fall in anticipated value of [REDACTED] to [REDACTED] (17%) meant traditional mortgage and self build lenders loan criteria could not be met in order to refinance the development loan. As a result of this unexpected financial uncertainty, the property was offered for sale or rent, and expensive short-term bridge financing was put in place to provide more time to find a long-term viable solution. A succession of costly bridge loans have funded all borrowings and provided time for the property to be rented. This enabled the bridge funding to be refinanced with a combination of first and second charge loans, which are currently in place and due to be refinanced prior to the end of 2017. Shown below are details of all loans and their costs and charges which are in advance of [REDACTED]

This house was built by myself as a self build development for my family and I to live in. As I can not afford to live in the house due to this financial loss I am renting it out to pay the high interest loans. In addition to the loss in value, I have taken a succession of these costly loans so as not to sell the property at a significant loss in value. I am not a professional developer.

6.6

Development Loan. During construction the property was provided with a development loan from the lender [REDACTED]. On completion of the loan term, extra time was needed to refinance the loan due to the lower than expected sales valuation of the home. This resulted in increased late interest daily rate charges which were added to the [REDACTED] whilst refinance was sought. With less stringent lending criteria, short-term bridge financing was arranged to refinance the [REDACTED] pay the late interest fees, and give more time for a longer term solution to be found.

As shown in the Appendix 8 - [REDACTED] Statement 22.11.13 file, the [REDACTED] was redeemed on November 2013 for [REDACTED] with [REDACTED] of additional late interest payments incurred as a result in delays in refining the loan.

6.7

initially refinanced the [REDACTED] for eight months through to the end of August 2014, when due to the lack of a successful rental or sale the loan was refinanced again with a second bridge lender, [REDACTED]. The [REDACTED] had a plethora of fees and interest charges which when redeemed increased borrowing by a further [REDACTED]

See in the Appendix 9 - [REDACTED] Redemption Statement 2014 which provides full details of the loan redemption amount and duration of the loan.

6.8

[REDACTED] refinanced the [REDACTED] loan at the start of September 2014. This allowed further time for either a long-term rental or sale of the property to be achieved, with sales agents confirming the lack of on-road CPZ parking was putting off interested family buyers. As with the [REDACTED] the [REDACTED] had many fees and interest costs which were added to the initial capital loan balance of [REDACTED]. In total when then loan was refinanced in January 2015, total loan associated costs and interest charges amounted to [REDACTED]

See in the Appendix 10 - [REDACTED] Statement 2014/2015 with full details of the loan redemption amount and the duration of the loan.

Total fee and interest cost for the delayed refinance of the Goldentree loan and the subsequent bridge loans have amounted to [REDACTED] of extra funding costs associated with the reduction in value caused as a result of lack of CPZ parking.

6.9

Current Financing Solution. A renter was found for the property in early 2015 which enabled a creative high risk financing solution to refinance the [REDACTED]. This consisted of one first charge mortgage loan from [REDACTED], and two second charge bridge loans from [REDACTED]

First charge mortgage lender [REDACTED] advanced a total of [REDACTED] towards repayment of the [REDACTED] balance on 14 January 2015. [REDACTED] advanced a total of [REDACTED] towards repayment of the [REDACTED] as a second charge loan behind the [REDACTED] on 14 January 2015. [REDACTED] also advanced a further total of [REDACTED] towards repayment of the [REDACTED] balance as a second charge loan behind a first charge residential mortgage loan to 29 Lancaster Grove, NW3 4EX on 14 January 2015.

6.10

All three of these loans carry high interest, risk and costs associated with the reduced value of the house and resulting higher than expected levels of borrowing. Appendix 11 - [REDACTED] have copies of facility letters for all three loans which detail dates, fees and borrowed amounts. For the purpose of this planning appeal assessment, it is conservatively estimated a further [REDACTED] of cost associated with the current financing solution have been incurred as a result of the increased level of borrowing associated with lack of CPZ parking.

The [REDACTED] loans currently funding the home are due to be refinanced before the start of January 2018. As shown in the Appendix 11 facility letters for the [REDACTED] [REDACTED] the interest charges and fees are very high, and a significant portion is added to the loan amounts. It is possible with the lower, without parking valuation, and the resulting higher loan amount, that a new refinance will not be possible and that the property may have to be sold quickly at a financial loss.

6.11

This background evidence shows how at least [REDACTED] worth of increased financing costs has been incurred. This is as a result of a lower than expected loan valuation which meant traditional mortgage underwriting criteria could not be met, forcing expensive bridge financing loans to be taken.

The loan valuation details that the value of the home fell by [REDACTED] of the gross development value between the time that it was originally valued by the reputable agents, [REDACTED] and now valued for loan underwriting purposes at [REDACTED]. This is far in advance of the findings of The Camden Local Plan Evidence Report for Car-Free Development (February 2016). This study commissioned by the Council indicates the likely impact on a scheme being required to be car-free is between 0.48% to 3.92% of gross development value in areas with a PTAL rating of 4 and above, with the average impact on gross development value being 1.89%. This average contrasts considerably with the 17% impact on value in this case as a result of the Trinity Walk house not having access to a CPZ parking permit.

The case officer delegated report also makes reference to the Camden Local Plan Evidence Report for Car-Free Development (February 2016) that states values and profit can actually increase where parking is not provided, and that the subject property could have benefited from an increase in value as a result. This is through both reduced construction cost associated with not providing parking and the provision of increased amenity space where parking is not provided. **The Trinity Walk house did not benefit from any cost savings associated with not providing parking as car access is not possible as the house is landlocked. The use of this evidence by the case officer confirms Camden has not reviewed this application on a case-by-case basis, and has applied broad criteria without even assessing the specifics of the application or visiting and understanding the location.**

7 PTAL and Location

7.1

The house is well served by public transport, being shown above as a borderline PTAL 5 area, with bus stops less than 5 minutes walk away on both Finchley Road and Finsbury Avenue. Underground and Overground railway stations at Finchley Road and Finchley Road & Frognal are also a 5 minute walk away. The occupier of the Trinity Walk house would park on the southern section of Maresfield Gardens. This location is the opposite to the preconceived town centre location idea. There is a high proportion of off-road parking, and a one way road restriction that reduces car flow and parking pressure, as shown in the independent study.

7.2

While it is acknowledged that the occupants of the house would benefit from local transport links, the Council does not have the data to demonstrate how sustainability levels would be compromised given the proven availability of on-road parking in the Maresfield Gardens locality.

7.3

In assessing the relevance of the PTAL methodology in influencing car free decision making, it is important to understand the ability to use accessible public transport to connect with a location at night or the weekend. Unfortunately, the PTAL methodology is severely prone to misinterpretation, as it takes no account for the location being travelled to, and only addresses peak public transport service hours. The use of the PTAL methodology also fails to recognise that occupants may need parking to enable them to do their job, including those working for Camden Council or essential workers.

8 Further Planning Considerations

8.1

The Case Officer Delegated Report (Appendix 2) details the applicant entered into a signed S106 agreement which contained a specific condition detailing that CPZ permit parking would not be available to the occupants of the house. This is correct, however, when the S106 document was signed, the applicant was unaware, and being a self builder not a developer, did not have the experience to know the loss in value implications the lack of CPZ parking would have. If the financial implications would have been known, the applicant would have changed the buildings design. Flats would have been developed where there is less reliance on a car than in a large detached single family home. The financial evidence provided clearly shows that the applicant borrowed considerable sums to build a family dwelling house, and that lenders lent on the belief that a gross development value of £3,000,000 would be achieved. The S106 would not have been signed and these sums would not have been lent or borrowed, if the impact of the 17% fall in gross development value, as a result of lack of CPZ parking, had been known.

8.2

The delegated officer report (appendix 2) references the initial application for development on the site was made prior to the implementation of the Camden Local Plan 2016, and T2 parking and car free policy. This policy makes reference to the award of a CPZ parking permit to a new development where the subject address is subdivided from a site that already has residential use that qualifies for CPZ parking permit access. The Trinity Walk house sits on backland that formed part of 106 Finchley Road which is a part commercial, part residential building, with residential qualification for CPZ parking permits. The occupants of the residential part of 106 Finchley Road are students who do not own and take-up the 106 Finchley Road CPZ parking permit allowance. **Hence, as the site had pre-qualification for a CPZ parking permit, this case should be considered differently to a new build development on land without pre-CPZ parking permit qualification.**

8.3

The delegated officer report also notes that the Hampstead Conservation Advisory Committee has asked that not only no CPZ parking permits should be allowed for the Trinity Walk house, but also not for any other property associated with the applicant. This unlawful request is made without consideration of the facts presented.

8.4

The delegated officer report also states in its assessment of this proposal that if the car free restriction were lifted there would be no limit to the number of CPZ permits the occupiers of the house could apply for. The report suggests an exponential amount of CPZ permits could be issued, with a resulting severe impact to available on road parking within the Maresfield CPZ locality. This is not correct, as up to three vehicles can be registered to park with an interchangeable registration allowing only one of the registered vehicles to use the CPZ permit at any one time. The effect of this interchangeable allowance is significantly lower than the limitless permits being suggested in the case officers proposals of the delegated report.

9 Response to Policy Objections

9.1

The Delegated Officer Report (Appendix 2) sites that the reason for refusal of this application is that it conflicts with the Local Development Framework policies CS11, DP17, DP18, DP19, DP32, as well as Camden Planning Guidance 7.

9.2

CS11 - Deals with minimising congestion and environmental impact by minimising the provision for private parking in new developments, in particular those in Town Centre locations. The policy says nothing about denying residents of new developments on-street parking. All applications should be considered on a case-by-case basis and not judged without detailed assessment. **The impact of not having the opportunity to apply for a CPZ permit, has in this instance made the self build project financially unviable and potentially not viable long-term. It has also been shown by the independent Lambeth Methodology parking study, that there is sufficient CPZ capacity for residents of the house to apply for CPZ permit parking.** The CS11 policy is suited to larger developments where the impact of parking and increased traffic would be far greater than with this one off self build development.

9.3

DP17 - Seeks to resist development that would be dependant on travel by private motor vehicles. The policy says nothing about denying parking to force residents to cycle or use public transport, or denying residents of new developments on-street parking. After building the Trinity Walk house, and incurring significant financial consequences as a result of the S106 car free status. It is clear the development of a detached single family home, such as Trinity Walk, is very much dependent

on having use of a private motor vehicle. This would not be the case with smaller dwellings such as flats, where vehicle dependency is far less and DP17 is more relevant.

9.4

DP18 - States that development should be car free in town centre locations and areas easily accessible to public transport. As shown when assessing the relevance of the PTAL methodology to assess location and accessibility, transport routes are not accessible for a substantial part of the time during the night. There is also no account for poor accessibility of other locations in London that may need to be reached via public transport. This makes the PTAL methodology an inappropriate tool to measure accessibility. The independent parking report also states there is sufficient on-road parking capacity which would not breach pre-determined sustainable levels. It is also disputed that Finchley Road is one of the most accessible public transport locations in the borough, when compared to areas in the south of the borough, such as Kings Cross and Euston which are far more accessible. The parking study also shows CPZ parking permit bay capacity in the Maresfield Gardens vicinity, and that the area is not representative of a typical town centre location, and that parking demand is not consistent across the CA_B CPZ.

9.5

DP19 - Deals with resisting development that would add to on-road parking demand where on-road parking is unable to meet that demand. The parking study shows that additional on-road parking for more than one car is be possible, with no changes needed to be made to the CPZ if additional parking were allowed. The Council has also stated via email (Appendix - Council Correspondence) it has no data to show there is no additional CPZ parking permit capacity in the CA_B CPZ.

9.6

DP32 - Seeks to minimise the impact of traffic on poor air quality, and its contribution to climate change. This policy says nothing about not providing CPZ permit parking, where as shown in the parking study, there is on-road CPZ capacity available which is within impact limits on traffic and poor air quality levels.

9.7

Camden Planning Guidance 7 - States the Council expects car-free development in the boroughs most accessible locations where development could lead to on-street parking problems. As stated in response to DP18, there are flaws in the use of the PTAL methodology in assessing location and accessibility, and as show in response to DP19, the results of the Parking Study shows additional parking capacity is available in the locality to the house, without causing sustainability or on-street problems.

10 Grounds of Appeal

10.1

The facts presented in this appeal need to be assessed on an individual case-by-case basis, rather than reviewed broadly against policy with reference to inadequate and misleading data. The parking study has been undertaken by a highly qualified and experienced individual, in accordance with the established Lambeth methodology. The study finds there is on road CA_B CPZ parking capacity in the CPZ parking bays in the vicinity of the house. The Council refer to their contrasting ten years worth of parking data which does not support the parking study. When substantiated post application refusal, the Councils data is found to be seriously out-of-date and irrelevant to this application.

10.2

Financial loss evidence which was not part of the planning application has now also been provided and substantiated. This shows significant loss in the value of this family home, which due to the lack of CPZ parking is significantly in advance of the findings of The Camden Local Plan Evidence Report for Car Free Development (February 2016). Increased financial borrowing costs have also been incurred as a result of the loss in value, making the long-term funding and ownership of this family home uncertain. Without CPZ parking, the losses incurred through the fall in expected value of this self build family home could have severe negative consequences on my family, potentially resulting in loss of the property.

10.3

This development is unique in that it was undertaken as a self build project on a unused infill plot of land; it was not a for profit development undertaken by a large professional developer. When the S106 was signed, the heavy financial impact (equating to a 17% loss in value could not have been projected), particularly as this loss far outweighs Camden's own statistics on the impact of withholding on-road parking rights for new builds. It was only on completion and formal valuation that it became clear that value of the home would be heavily reduced through lack of on-road CPZ permit parking. If this had been known when the S106 was signed, the S106 would not of been signed, and a development not effected by lack of parking would of been planned.

10.4

The use of PTAL methodology to assess accessibility is not a good tool, as it takes no account of accessing hard to reach locations at out of hours times. The occupiers of a family home of this nature are likely to have a variety of needs, which could include reaching destinations out of hours for work. The lack of parking for this one-off self build development has no relevance to the accessibility of the location, and that parking is a necessity to make this development financially viable long-term.

11 Conclusion

11.1

The delegated officer report states that the data and analysis provided in the parking study provides no clear compelling evidence to outweigh policy reasons for refusal of the application.

11.2

This appeal endorses the results of the parking study, and now disqualifies the Councils own data which was used in the planning application to discredit the parking study findings. In addition, financial loss has now been substantiated to show how significant falls in value can be attributed to lack of occupier available CPZ permit parking. The use of the PTAL methodology as a measurement of accessibility is also now questioned.

11.3

This new information, plus additional evidence as provided, now provide clear justification for the removal of the S106 CPZ parking permit restriction, and provide a strong case that outweighs policy reasons for refusal.

12 Appendices

- Appendix 1 - Transport and Traffic Consultancy Parking Study
- Appendix 2 - Delegated Officer Report
- Appendix 3 - Council Correspondence
- Appendix 4 - Instruction letter New House, Trinity Walk 19.03.14
- Appendix 5 - MA Letter 03.03.14
- Appendix 6 - [REDACTED] Price Change Letter 12.05.14
- Appendix 7 - [REDACTED] Valuation report [REDACTED] Northern Heights 1 Trinity Walk Valuation Copy P9)
- Appendix 8 - [REDACTED] Redemption Statement 22.11.13 file
- Appendix 9 - [REDACTED] Redemption Statement 2014
- Appendix 10 - [REDACTED] Redemption Statement 2014/2015
- Appendix 11 - [REDACTED]