

Re: Plot Map

Lucy Harrison

Mon 24/07/2023 10:37

To:

Cc:

📎 1 attachments (12 MB)

137226 & 137227 Gt Jackson St Plot Map.pdf;

Hi

Further to your email below, the information on-line via Manchester City Council's website identifies the sites to which the two applications relate. However, for ease, please see the attached plan, which identifies the different plots ('Crown Street Phase 3' is the site referred to as Part Of Plot C And Plot E under planning application reference 137226).

Regards

Lucy

Lucy Harrison
Senior Planner
Development Management Central Core
Planning, Building Control & Licensing
Growth & Development Directorate
Manchester City Council

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Postal Address: Planning, Manchester City Council, Floor 6, Town Hall Extension, PO Box 532, Town Hall Manchester M60 2LA (Sat Nav System use M2 5DB)

NB My days of work are Monday, Tuesday, Wednesday and Thursday

From:

Sent: 23 July 2023 19:30

To: Lucy Harrison

Cc:

Subject: Plot Map

You don't often get email from [Learn why this is important](#)

Hi Lucy,

My name is and I live in , together with

We recently received your letters (Application numbers 137226/FO/2023 and 137227/FO/2023)

The letters referenced plots C, D and E however there was no accompanying map to showcase where these are.

Would you be able to please send it over?

Many thanks



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

25/07/2023



Lucy Harrison
Director of Planning, Building Control & Licensing
MANCHESTER CITY COUNCIL
Level 6 Town Hall Extension
Po Box 532
M60 2LA

Subject: Concerns and Suggestions Regarding the Increased Size of Developments

Dear Lucy Harrison,

I hope this letter finds you well. My name is [REDACTED], and I am a concerned resident and member of the Deansgate Square community. I am writing to express my objections to the current plans for increased development size within our area and to offer alternative suggestions that I believe would benefit the community.

I have noticed that the proposed developments entail several issues that are of great concern to me and many other residents. I would like to draw your attention to the following key points:

1. **Overshadowing and Loss of Natural Light:** The height and density of the proposed buildings in the development plans pose a significant risk of overshadowing our neighbourhood. This has the potential to cause a loss of natural light from every aspect, negatively impacting the well-being and quality of life of residents. We cherish the abundant sunlight our community currently enjoys, and it is crucial to preserve this aspect to maintain a vibrant and healthy living environment.
2. **Insufficient Provision for Local Services:** With an increase in the size of developments, the population in our area is bound to grow. However, I am concerned that the current plans do not adequately address the need for additional local services such as schools, healthcare facilities, public transportation, and recreational spaces. It is essential to plan and ensure that the infrastructure can cater to the needs of a growing community without compromising the quality of services.
3. **Reduced Privacy:** The proposed closely spaced buildings may result in a reduction of privacy for residents. We value our sense of community and privacy, and it is vital to consider the impact of increased development on personal spaces and outdoor areas. Balancing density with sufficient breathing space is essential to maintain a harmonious living environment for all.

4. Contradiction to the Original Great Jackson Street Framework: The current development plans appear to deviate from the original Great Jackson Street Framework, which was designed to guide the growth of our community in a cohesive and sustainable manner. Departing from the framework could lead to an inconsistent and disjointed urban landscape that does not align with our community's long-term vision.

I kindly request that you consider these suggestions and thoroughly assess the potential implications of the current development plans. As stakeholders in this community, we believe that collaborative decision-making and thoughtful urban planning will foster a thriving and liveable environment for current and future residents.

Thank you for your time and attention to these matters. I would be grateful for an opportunity to discuss these concerns further and contribute to the planning process.

Looking forward to a positive and constructive dialogue.

Sincerely,

[Redacted Signature]



Fw: Application Reference: 137227/FO/2023

Planning

Fri 04/08/2023 15:58

To: Lucy Harrison <[REDACTED]>

 1 attachments (105 KB)

Application Ref 137227.FO.2023.pdf;

Regards
[REDACTED]

Information, Delivery & Support Team
Planning, Building Control & Licensing
Growth & Development Directorate
Postal address: Manchester City Council, P O Box 532, Town Hall, Manchester M60 2LA
Location address: Level 6 Town Hall Extension, Manchester M2 5DB
Tel: 0161 234 4516

Please consider the environment before printing an e-mail.

From: [REDACTED]
Sent: 04 August 2023 14:24
To: Planning <[REDACTED]>
Subject: Application Reference: 137227/FO/2023

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sirs,

Application Reference: 137227/FO/2023
Address: Plot D Great Jackson Street Manchester M15 4NP
Applicant: Renaker Build Ltd

In accordance with the deadline for the submission of objections in relation to the application referenced above, please find attached a letter of objection submitted on behalf of Great Jackson St Estates Limited.

We would be grateful if you could please acknowledge safe receipt.

Kind regards,
[REDACTED]

[REDACTED]
Associate

[REDACTED]



Walker Morris LLP, 33 Wellington Street, Leeds, LS1 4DL
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BY EMAIL ONLY
Planning
Growth and Development
Manchester City Council

Our ref JYK/GRE01982.2

Application Ref: 137227/FO/2023

4 August 2023

Dear Sirs

Application for full planning permission for the demolition of existing structures and the erection of one residential building to a height of 71 storeys comprising 642 homes (Use Class C3) with food and drink uses (Use Class E) and / or drinking establishment (Sui Generis); and one office building (Use Class E); with basement car parking, cycle parking, landscaping and public realm, servicing and access arrangements, highways alterations and associated works

Plot D Great Jackson Street Manchester M15 4NP ("Site")

Application Reference: 137227/FO/2023 ("Application")

1 Introduction

- 1.1 We are instructed by Great Jackson St Estates Limited ("GJSEL")
- 1.2 GJSEL is the long leasehold owner of the site at 34 Great Jackson Street, Manchester.
- 1.3 GJSEL has reviewed the Application submitted on behalf of Renaker Build Limited ("Renaker") and, for the reasons set out below, strongly objects to it.
- 1.4 To summarise, the viability evidence submitted in support of the Application is wholly inadequate and is contrary to national planning guidance and the RICS professional standards. It fails to demonstrate that the scheme is either viable or that it is justified in making such limited section 106 contributions. For the reasons set out below, the Application is contrary to the development plan and should be refused.
- 1.5 Please note that if Renaker submits any further information, particularly on viability grounds, in support of the Application then we reserve the right to make representations to the Council at that time.

2 Application

- 2.1 The Application was received by the Council on 8 June 2023, and validated on 26 June 2023. We are not aware of when the Application will be presented to the Council's members for determination. However, please note that GJSEL will be represented at that meeting.
- 2.2 Renaker has submitted a "Financial Viability Assessment", dated June 2023, in support of the Application. It is not clear who has prepared this document, but it includes Renaker's branding on the cover page. It is therefore assumed that this assessment has not been produced by an independent party. Indeed, it is stated in the Environmental Statement, submitted with the Application, that the author of the viability work is Renaker. However, please can the Council clarify this with Renaker and confirm the position to us as soon as possible?
- 2.3 Paragraph 2.3 is titled "Planning / S106 Contributions". It states that the scheme will include the delivery of new public realm. The cost of such works is stated to be £2,270,471. This appears to be the totality of the section 106 contributions offered by Renaker (and then taken into account in the viability assessment).
- 2.4 Paragraph 3 sets out how the assessment has been undertaken. It is noted that the report has been prepared based on the following information:
- *"Estimated Construction Costs produced by Renaker Build Limited (May 23)*
 - *Area Schedules and Scheme drawings in line with the planning application".*
- 2.5 Renaker state that it has also relied on the sales rates being achieved at its developments at Crown Street, Deansgate Square and Colliers Yard, and it is also stated that sales values from "*other similar developments*" have been utilised. It is not clear which other developments are being referred to.
- 2.6 The supporting information (in particular the May 2023 work produced by Renaker) and the comparable sales data is not included in the report.
- 2.7 For the commercial and office space, Renaker has applied a value of £20 per square foot and £25 per square foot respectively (both at a 6% yield). The report does not provide evidence to support these figures.
- 2.8 The "Additional Assumptions" that have been made are set out on page 7. Various items, such as finance rate, professional fees, development management fee, contingency and agency fees on sale are calculated based on "*market knowledge*". No supporting evidence is produced.
- 2.9 The construction costs and the office facility are stated to be based on the Estimated Construction Costs produced by Renaker. As noted above, the underlying work by Renaker has not been disclosed.

- 2.10 The outputs from these assumptions are set out in the table at appendix 1. This purports to show: the total development cost, the total development value and the margin. It is noted that a land purchase figure of £3,501,017 is included in the total development costs. It also includes the office build costs of £5,057,580 and the costs of the "*external public realm and highway works / mancunian way*" of £2,270,471. The table produces a margin on value of 10.04%.
- 2.11 The conclusion of the report is that the scheme cannot support "*further s106 / affordable housing contribution*". The reasons given for this stance are: (i) the cost of the public realm works; (ii) the quality of the scheme; and (iii) delivery costs. We comment on the relevance of these factors below.
- 2.12 When the report refers to "*further s106...contribution*", it is not clear exactly what the package of section 106 contributions on offer is. It appears to be the public realm and highway works referred to in the table at appendix 1. However, paragraph 2.3 only refers to public realm works (rather than any highway works). The Council should clarify, and then make publicly available, what is proposed and at what cost. In addition, if there are any further contributions that are being offered, then this should be disclosed as soon as possible.
- 2.13 Renaker assert that "*an industry standard development of such scale and risk profile should produce a development margin of 25.00% plus*". No evidence is produced to substantiate this assertion. Renaker's position is that the Application, with no further section 106 contributions (and specifically no affordable housing) would produce a margin 15% less than the level required to incentivise it to undertake the development.

3 Planning Policy

- 3.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that:
- "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."*
- 3.2 The weighing of all other material considerations includes consideration of the policies of the National Planning Policy Framework ("NPPF")¹.
- 3.3 Manchester City Council's development plan comprises of, inter alia, the Core Strategy 2012 – 2027 ("Core Strategy"). The Core Strategy policy on "tall buildings" is contained in policy EN 2. It states that:
- "Tall buildings are defined as buildings which are substantially taller than their neighbourhoods and / or which significantly change the skyline".*
- 3.4 Policy EN 2 contains various requirements, which stress the importance of design, location and sustainability. It goes on to state that:

¹ Secretary of State for Communities and Local Government v Hopkins Homes Limited [2016] P.T.S.R. 1315

"It will be necessary for the applicant/developer to demonstrate that proposals for tall buildings are viable and deliverable."

3.5 The supporting text notes that:

"12.15 It is crucial that the viability and deliverability of a proposed tall building be proven. Unimplemented planning permissions for tall buildings can have a significant impact on land value and can distort the market in an unacceptable manner. This can hinder the development of the site for other uses and can have an adverse impact on the developability of other sites. This can have a significantly negative impact on the regeneration of an area."

3.6 Policy PA 1 is the Council's policy for developer contributions. It provides that:

"In determining the nature and scale of any planning obligation, specific site conditions and other material considerations including viability, redevelopment of previously developed land or mitigation of contamination may be taken into account".

3.7 Policy H 8 addresses affordable housing. It states that:

" 1. New development will contribute to the City-wide target for 20% of new housing provision to be affordable. Developers are expected to use the 20% target as a starting point for calculating affordable housing provision. It is envisaged that 5% of new housing provision will be social or affordable rented and 15% will be intermediate housing, delivering affordable home ownership options..."

4. Either an exemption from providing affordable housing, or a lower proportion of affordable housing, a variation in the proportions of socially rented and intermediate housing, or a lower commuted sum, may be permitted where either a financial viability assessment is conducted and demonstrates that it is viable to deliver only a proportion of the affordable housing target of 20% or where material considerations indicate that intermediate or social rented housing would be inappropriate".

3.8 The supporting text to policy H 8 highlights that there is a *"need for 438 affordable units annually"*.

3.9 However, in addition to this figure, paragraph 9.32 states that *"almost 39% of households, whilst not qualifying for social rented housing, are unable to purchase their own house"* and that *"shared equity or ownership options will be necessary to meet Manchester's target of increased home ownership. It suggests therefore that 438 is a minimum figure to address the wider problems of affordable housing..."*.

4 National Planning Policy Framework ("NPPF") and Planning Practice Guidance ("PPG")

4.1 Before turning to our assessment of the viability evidence produced by Renaker, we highlight below the key sections of the NPPF and PPG that provide firm instructions on how such evidence should be produced.

4.2 Paragraph 58 of the NPPF states that:

"All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available."

4.3 The PPG provides more detailed guidance on viability assessments. It is stated that:

*"The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and viability evidence underpinning the plan is up to date, and site circumstances including any changes since the plan was brought into force, and the transparency of assumptions behind evidence submitted as part of the viability assessment."*²

4.4 The PPG also comments on how a viability assessment should be undertaken, when stating:

*"Any viability assessment should follow the government's recommended approach to assessing viability as set out in this National Planning Guidance and be proportionate, simple, transparent and publicly available."*³

4.5 When referring to how gross development value should be defined, it is stated that:

*"For viability assessment of a specific site or development, market evidence (rather than average figures) from the actual site or from existing developments can be used. Any market evidence used should be adjusted to take into account variations in use, form, scale, location, rents and yields, disregarding outliers."*⁴

4.6 The PPG goes on to state that the:

"Assessment of costs should be based on evidence which is reflective of local market conditions..."

Costs include:

- *Build costs based on appropriate data, for example that of the Building Cost Information Service.*
- *the total cost of all relevant policy requirements including contributions towards affordable housing and infrastructure, Community Infrastructure Levy charges, and any other relevant policies or standards. These costs should be taken into account when defining benchmark land value...*
- *explicit reference to project contingency costs should be included in circumstances where scheme specific assessment is deemed necessary, with a justification for contingency relative to project risk and developers return".*⁵

² Paragraph: 008 Reference ID: 10-008-20190509

³ Paragraph: 010 Reference ID: 10-010-20180724

⁴ Paragraph: 011 Reference ID: 10-011-20180724

⁵ Paragraph: 012 Reference ID: 10-012-20180724

- 4.7 The approach to defining land value, for the purposes of a viability assessment, is clearly set out in the PPG:

"To define land value for any viability assessment, a benchmark land value should be established on the basis of the existing use value (EUV) of the land, plus a premium for the landowner.⁶"

- 4.8 It goes on to state that *"Existing use value is not the price paid and should disregard hope value"* and also that *"Under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan⁷".*

- 4.9 The PPG also considers the level of return that a developer should expect to receive. It states that:

"For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies. Plan makers may choose to apply alternative figures where there is evidence to support this according to the type, scale and risk profile of planned development. A lower figure may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces risk. Alternative figures may also be appropriate for different development types."

5 RICS Guidance

- 5.1 In addition to the Government's planning policy and guidance, it is also important to highlight the professional standards issued by RICS on this topic.

- 5.2 RICS issued a professional standard titled "Financial viability in planning: conduct and reporting" in May 2019. The introduction to this document highlights that:

"This professional standard sets out mandatory requirements on conduct and reporting in relation to FVAs for planning in England, whether for area-wide or scheme-specific purposes."

- 5.3 It clearly sets out the fourteen requirements which *"must be included in all FVAs (scheme-specific and area-wide) and how they must be carried out"*.

- 5.4 These include the following:

5.4.1 A financial viability assessment ("FVA") must include a statement that it has been prepared with objectivity, impartially, without interference and with reference to all appropriate available sources of information.

5.4.2 All inputs into an appraisal must be reasonably justified.

⁶ Paragraph: 013 Reference ID: 10-013-20190509

⁷ Paragraph: 006 Reference ID: 10-006-20190509

- 5.4.3 When providing the benchmark land value, RICS members are instructed to report on the existing use value (as set out in the PPG). It is also highlighted that while the price paid for the land may be reported to improve transparency, *"this is not allowable evidence for the assessment of benchmark land value and cannot be used to justify failing to comply with policy"*.
- 5.4.4 All FVAs *"must provide a sensitivity analysis of the results and an accompanying explanation and interpretation of respective calculations on viability, having regard to risks and an appropriate return(s)."*
- 5.5 A further professional standard was issued by RICS in April 2023, titled "Assessing viability in planning under the National Planning Policy Framework 2019 for England"⁸.
- 5.6 This contains further detail on a number of areas, including commentary on the section of the PPG which deals with standardised inputs into viability assessments. It is noted that *"Market information concerning costs, values and optimal assumptions can be used. This means that standardised inputs are market, not individual developer, orientated."* Various examples are then provided of the types of evidence that could be utilised.
- 5.7 This document also provides instructions on the use of costs evidence. At paragraph 4.2.14, it is stated that:
- "Wherever possible, cost estimates should be based on market evidence from similar developments. BCIS and other indices are 'appropriate' but are not always reflective of local market conditions. The basis for the construction of any cost indices or other data used should be explored and reported, and limitations noted."*
- 5.8 The assessment of benchmark land value ("BLV") is considered in paragraph 5 of the professional standard. It notes that:
- "The BLV is not a price to be paid in the marketplace; it is a mechanism by which the viability of the site to provide developers' contributions can be assessed. It should be set at a level that provides the minimum return at which a reasonable landowner would be willing to sell."*
- 5.9 The professional standard provides a five-step process to calculate the BLV. The first step is to determine the existing use value of the relevant land. This reiterates the guidance provided in the PPG, which is referred to as *"unambiguous"* in prescribing that existing use value is *"the primary approach"*.

6 Analysis

Approach to Viability Assessment

⁸ This was originally a guidance note issued in March 2021, but it was reissued as a professional standard in April 2023.

- 6.1 The Renaker viability assessment does not explain who has prepared the report. We therefore do not know: if it was produced by an independent party (it would appear not), the evidence that underlies it or the process that has been followed in preparing the report. This is contrary to the PPG and RICS Professional Standards, which highlight the importance of transparency and the undertaking of an independent assessment.
- 6.2 The detailed extracts from the PPG and RICS Guidance, set out above, are clear that the starting point for the viability assessment is the establishment of a BLV, and that this should be based on existing use value, plus a premium for the landowner. This is unambiguous and clear.
- 6.3 The viability evidence produced by Renaker makes no attempt at establishing a BLV. This is a critical failure of the work produced by, or on behalf of, Renaker. It is contrary to national guidance, and the RICS professional standards, and therefore the assessment should not be relied upon in the determination of the Application. Indeed, it is noted that the Council has issued a validation checklist for planning applications. It states that viability assessments should include, inter alia, existing use value plus a premium. This highlights that the Renaker assessment is insufficient to support a valid planning application and clearly cannot be relied upon to support an argument that the scheme should not provide policy-compliant planning obligations⁹.
- 6.4 Renaker's assessment also relies upon the price paid for the land, as highlighted in paragraph 2.10 above. This contradicts the PPG and the professional standards issued by RICS. The PPG could not be more clear, when stating that, "*Under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan*".
- 6.5 This further demonstrates that the Renaker viability assessment cannot be relied upon in support of the Application.
- 6.6 The cost evidence produced by Renaker is also lacking in any detail. The totality of its evidence is the "*estimate construction costs produced by Renaker Build Limited (May 2023)*", which we have not been provided with, and the "*area schedules and scheme drawings*". This ignores the instructions from the PPG and the RICS professional standards. All that has been disclosed is the final figure that has been reached. The underlying information should be made publicly available for review.
- 6.7 This lack of transparency is unacceptable. It is not clear, for example, if Renaker has reviewed data produced by the Building Cost Information Service in calculating the construction costs. The lack of detail and supporting evidence means it is not possible to accurately interrogate the Renaker report.
- 6.8 Renaker also assume a contingency of 5% on construction costs. The PPG states that a justification should be provided for the inclusion of a contingency, relative to the project risk and developers return. No such justification has been provided. Renaker simply state that this is "*based on market knowledge*". This is wholly inadequate.

- 6.9 The failings of the Renaker report cannot be rectified by an independent assessment, undertaken by the Council (regardless of the quality and compliance of such an assessor). It is not the job of the assessor to provide their own assessment of the viability of a scheme. It is the responsibility of the applicant to produce a quality, compliant viability case. If they have not, then the assessor should not be asked to undertake their review.
- 6.10 For the reasons set out above, the Renaker report does not comply with the PPG or the RICS Professional Standards and should be given no weight in the determination of the Application.

S106 Contributions Offered

- 6.11 The Renaker assessment is unclear on what planning obligations are actually offered. The conclusion of the report suggests that the offer comprises of public realm works costing c.£2.27m. However, the appendix refers to public realm works and highway works. This should be clarified and the clarification made publicly available.
- 6.12 There is no affordable housing included in the scheme and no offer has been made to deliver any other obligations. Renaker rely on its viability assessment to support this position. This is untenable, as explained above.
- 6.13 In addition, Renaker also suggest that the quality of the scheme justifies the reduced planning obligations on offer. It is unclear on what basis this argument is made. It appears perverse that delivering a higher quality scheme should justify not providing any affordable housing – particularly when there is such a pressing need.
- 6.14 It is not clear from Renaker's report whether the offer of zero affordable housing has been discussed with the Council in advance of the application being submitted. If it has, then this information, and any relevant correspondence, should be made publicly available.

Viability of Scheme

- 6.15 The Renaker report concludes that it will deliver a "*margin on value of 10.04%*". It is stated that an "*industry standard*" for a development of this scale and risk profile is 25% plus.
- 6.16 There is no evidence produced to support the assertion that the industry standard is 25% plus. Indeed, it is notably higher than the figure included in the PPG. This needs to be properly examined and interrogated. It is unacceptable to rely on a simple statement such as this, without further supporting evidence.
- 6.17 The Renaker calculation has been made on the assumption that no affordable housing will be offered, or any other planning obligations (save for the public realm works which form part of the scheme). This is highly relevant when we come on to consider policy EN 2 and H 8.

⁹ Manchester City Council – Full, Outline, Reserved Matters & Variations / Removal of Conditions Planning Applications – Is your application valid? Revised January 2020

- 6.18 The impact of this claimed reduced margin cannot be understated. Renaker's case, on its own figures, is that the scheme produces a margin 59.85% less than the "*industry standard*". This equates to a difference in profit on value of £45,514,860. It is clear that Renaker's position is that the scheme is not viable.

Conflict with Policy

- 6.19 Policy EN 2 applies to buildings which are either substantially taller than their neighbourhoods and / or which would significantly change the skyline. This applies to the Application.
- 6.20 Policy EN 2 states that applicants will need to demonstrate that proposals for tall buildings are viable and deliverable.
- 6.21 On Renaker's own case, the development is not viable. The margin produced is 59.85% less than what is described by Renaker as the "*industry standard*" - which as noted in paragraph 6.18 above, represents a reduction in profit on value of £45,514,860. This demonstrates that Renaker are not sufficiently incentivised to undertake the development.
- 6.22 The supporting text to policy EN 2 highlights that, for proposed tall buildings, it is "*crucial*" that the viability of the scheme has been proven. This has simply not been achieved by Renaker. The viability assessment conflicts with the PPG and the RICS professional guidance, and it cannot be relied upon. In any event, the current assessment shows that the scheme is not viable. The Application is therefore clearly in conflict with policy EN 2.
- 6.23 Further, policy H 8 states that new developments are expected to contribute to the city-wide target of 20% of new housing provision to be affordable. The 20% target is to be used as a starting point for calculating affordable housing provision on a site-by-site basis. The supporting text to the policy is clear on the pressing need for affordable housing in Manchester.
- 6.24 The Application proposes to make no contribution to affordable housing. The only explanation we can see for this position is the viability work produced by Renaker. We have explained above why this work cannot be relied upon and is insufficient to justify the offer of no affordable housing (or alternatively a financial contribution). As a result, the Application is in conflict with policy H 8.

7 Conclusion

- 7.1 Please note, we have highlighted above how the Renaker viability assessment is in conflict with the PPG and the RICS professional standards. If further work is produced by Renaker, or if any of the supporting evidence we have requested is disclosed, then we reserve the right to submit further representations on receipt of that information.

- 7.2 In its current form, the Application is in conflict with policies EN 2 and H 8 of the Core Strategy. It is contrary to the Council's development plan and Renaker has not produced evidence which justifies a decision being taken contrary to the terms of the development plan. The viability evidence produced to date is wholly inadequate and should be given no weight in the determination of the Application.
- 7.3 Put simply, the Application should be refused.
- 7.4 Please confirm by return that this objection will be considered in the determination of the Application.

Yours faithfully

A solid black rectangular box used to redact the signature of the sender.

WALKER MORRIS LLP