

# Statement of Common Ground

---

## **Addendum Statement of Common Ground: Viability and Affordable Housing**

**Between Cove Construction Ltd, Peter Catt, Vincent Catt and Neil Catt and the South Downs National Park Authority**

**Appeal against the refusal of application SDNP/21/04848/FUL:**

***Development of 37 dwellings (including affordable homes) alterations to existing access onto Petersfield Road, hard and soft landscaping and all other associated development works***

**SDNPA Application Reference: 22/v0550/P**

**PINS Ref: APP/YP507/W/23/3314274**

**Date: 12 May 2023**

---

# Statement of Common Ground

## Introduction

- 1.1. This is an Addendum Statement of Common Ground ('Addendum SoCG') to the original submitted SoCG dated 14 March 2023, which sets out further common ground on matters relating to Viability and Affordable Housing between the South Downs National Park Authority ('SDNPA') represented by viability consultants Bruton Knowles ('BK'), and Cove Construction Ltd, Peter Catt, Vincent Catt and Neil Catt ('the Appellants'), represented by viability consultants CBRE.
- 1.2. Where referred to collectively, the SDNPA and the Appellants are hereafter referred to as 'the parties'.
- 1.3. Unless otherwise stated, the position of the parties remains as set out in the original SoCG.

## Further Matters of Common Ground between the Parties (Viability/Affordable Housing)

- 1.4. The Red Book Valuations of the Existing Use Value ('EUV') prepared on behalf of each of the parties included only a £15,000 difference, which is modest. It has therefore been agreed to split this difference.
- 1.5. Consequently, whilst the EUV component of the Site's Benchmark Land Value ('BLV') is agreed, the 'landowner premium' now remains the sole disputed input in the parties' respective calculations of BLV.
- 1.6. For clarity, the previous positions and the now agreed positions are set out in two tables respectively below. This also demonstrates the resultant BLV advocated by the respective parties.

| PREVIOUS POSITION |     | CBRE       |     | BK         |  |
|-------------------|-----|------------|-----|------------|--|
| EUV               |     | £995,000   |     | £980,000   |  |
| + Premium         | 20% | £199,000   | 10% | £98,000    |  |
| BLV               |     | £1,194,000 |     | £1,078,000 |  |

# Statement of Common Ground

| AGREED POSITION |     | CBRE              |     | BK                |  |
|-----------------|-----|-------------------|-----|-------------------|--|
| EUV             |     | £987,500          |     | £987,500          |  |
| + Premium       | 20% | £197,500          | 10% | £98,750           |  |
| <b>BLV</b>      |     | <b>£1,185,000</b> |     | <b>£1,086,250</b> |  |
| Change to BLV   |     | -£9,000           |     | +£8,250           |  |

1.7. The overall impact on the BLV is modest and does not result in either party’s position of the provision of affordable housing altering.

## Implications for Affordable Housing of Adopting either CBRE or BK Disputed Inputs

- 1.8. The respective positions of the parties in the submitted Proofs of Evidence is as follows:
- The Appellants offer is for the Proposed Development to contain 8x (21.6%) Shared Ownership tenure affordable housing units with a mix of 1 x 2-bed, 4 x 2-bed and 2 x 3-bed).
  - SDNPA/BK’s position is that the Proposed Development is financially viable with 13x (35.14%) Shared Ownership affordable housing units with a mix of 2x 1-bed and 11x 2-bed units.
- 1.9. It was agreed between the parties at the Case Management Conference (‘CMC’) on 2 May 2023 that, to aid the Inspector, the parties would seek to include an agreed summary that concisely set out the implications for provision of affordable housing (% and units) should the Inspector find in favour of either CBRE or BK on each of the disputed matters.
- 1.10. It was discussed that this could be represented as a ‘matrix’. The parties agree that further consideration will be given as to whether the information, alternatively, could be expressed as a series of points.
- 1.11. However, the parties have not been able to agree this information prior to the deadline for submission of this Addendum SoCG. The parties agree to continue to work together to provide this information to the Inspector.
- 1.12. Should the Inspector require the parties to provide specific and definitive viability scenarios testing disputed inputs to aid his decision making, these will be prepared and agreed between the parties for submission to the Inspector either during or following the Inquiry, in line with the Inspector’s instructions.