

For: Havant Borough Council Review of Applicant Submitted Viability Position

**Dairy Crest Depot
224 Dunsbury Way
Havant
PO9 5BQ**

**February 2019
(DSP18403N)**

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1. Notes and Limitations

- 1.1.1 The following does not provide formal valuation advice. This review and its findings are intended purely for the purposes of providing Havant Borough Council (HBC) with an independent check of, and opinion on, the planning applicant's viability information and stated position in this case.
- 1.1.2 This document has been prepared for this specific reason and should not be used for any other purpose without the prior written authority of Dixon Searle Partnership (DSP); we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned. To the extent that the document is based on information supplied by others, Dixon Searle Partnership accepts no liability for any loss or damage suffered by the client.
- 1.1.3 We have undertaken this as a desk-top exercise as is appropriate for this stage and level of review. For general familiarisation, we have considered the site context from the information supplied by the Council and using available web-based material.
- 1.1.4 The information supplied by HBC to DSP to inform and support this review process is noted to have been supplied by the planning applicant on a STRICTLY CONFIDENTIAL AND COMMERCIALY SENSITIVE BASIS. In looking at 'Accountability' the July 2018 published revised national Planning Practice Guidance (PPG) on viability says on this; 'Any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances.' Therefore, we suggest that the Council and prospective / current or subsequent planning applicant may wish to consider this aspect together. DSP confirms that we are content for our review information, as contained within this report, to be used as may be considered appropriate by the Council (we assume with the applicant's agreement if necessary).

2. Introduction

2.1.1 Dixon Searle Partnership (DSP) has been commissioned by Havant Borough Council (HBC) to carry out an independent review of the viability information supplied to the Council on behalf of the applicant, in this case by Jones Lang Lasalle (JLL). This is in relation to a proposed development at The Dairy Crest Depot, 224 Dunsbury Way, Leigh Park, Havant, PO9 5BQ. The proposals are for the demolition of existing buildings and erection of a five-storey block of seventy-eight flats, with access of Fulflood Road.

2.1.2 The application is in outline and the Council's planning reference is APP/18/01109.

2.1.3 The Council's adopted affordable housing policy (Policy CS9) of their Core Strategy requires affordable housing in accordance with the following:

'Planning permission will be granted for housing proposals that will:

- Deliver on average 30-40% affordable housing on sites of 15 dwellings (gross) or more and secure a suitable contribution, or on-site provision, equivalent to on average 30-40% on smaller housing developments between 5 and 14 dwellings (gross), unless a lesser requirement has been transparently justified on viability grounds.

2.1.4 In this instance, we understand that a minimum of 28 affordable units would be required.

2.1.5 HBC adopted a Community Infrastructure Levy (CIL) charging schedule which came into effect on 1st August 2013. The application proposes the erection of new dwellings thus the development is liable to pay CIL. The submitted development appraisal calculates the CIL liability at £750,140 for the all open-market scheme. A policy compliant scheme has not been submitted. This figure will need to be confirmed by HBC.

2.1.6 The viability information provided for review consists of the above-mentioned Viability Assessment (VA) by JLL (setting out the assumptions used). The information also includes associated appendices comprising a location plan, development plans, BCIS extract, and an appraisal summary generated from Argus Developer software (electronic file also provided). DSP, has also had sight of the Council's online planning file.

- 2.1.7 We have considered the assumptions individually listed within the viability report and appraisal and provided our commentary based on those whilst also carrying out sensitivity testing where our opinion differs from that of the applicant's agent.
- 2.1.8 This report does not consider planning policy or the wider aspects in the background to or associated with the Council's consideration of this scenario. Our involvement here is restricted to the viability of the development proposals and the ability of the proposed scheme to contribute towards affordable housing or other s106 obligations.
- 2.1.9 DSP's focus is on the submitted residential viability assumptions and therefore the outcomes (scope to generate land value) associated with that aspect of the overall proposals.
- 2.1.10 For general background, a viable development can be defined as *"the ability of a development project to meet its costs including the cost of planning obligations, while ensuring an appropriate site value for the landowner and a market risk adjusted return to the developer in delivering that project"*¹. Under normal circumstances, if the residual land value (RLV) created by a scheme proposal exceeds the market value or existing or alternative use value (and sometimes by a margin to reflect an "overbid" or level of incentive for the owner to sell for the residential redevelopment) then we usually have a positive viability scenario – i.e. the scheme is much more likely to proceed (on the basis that a reasonable developer profit margin is also reached). Alternatively, with a fixed land input (if considered reasonable) then profit residual needs to be sufficient to enable the development to proceed.
- 2.1.11 The submitted development appraisal has been run on the basis of a residual profit output, with that result compared to the stated benchmark profit level of 20% of GDV after allowing for a fixed land cost of £725,000 (representing the VA opinion of the benchmark land value of the site).
- 2.1.12 The report concludes that: *'...prior to the inclusion of any affordable housing the proposed scheme generates a profit of 0.05% of GDV which is way below the benchmark requirement of 20%. This demonstrates the scheme is not sufficiently viable to support any affordable housing'.*

¹ Financial Viability in planning – RICS Guidance note (August 2012)

- 2.1.13 This review does not seek to pre-determine any Council positions, but merely sets out our opinion on the submitted viability assumptions and outcomes in order to inform the Council's discussions with the applicant and its decision making; it deals only with viability matters, in accordance with our instructions.
- 2.1.14 Havant Borough Council requires our opinion as to whether the viability figures and position put forward by the applicant are reasonable. We have therefore considered the information submitted. Following our review of the key assumptions areas, this report provides our views.
- 2.1.15 We have based our review primarily on the submitted scheme appraisals to see if the viability assumptions are valid in our opinion and whether the base position put forward by the applicant is reasonable. We then discuss any variation in terms of any surplus (or deficit) created from that base position by altering appraisal assumptions (where there is disagreement) utilising the applicant's appraisals as a base.
- 2.1.16 This assessment has been carried out by Nick Molyneux, overseen by Rob Searle and Richard Dixon of DSP who have many years combined experience in the development industry working for Local Authorities, developers, Housing Associations and in consultancy. As consultants DSP have a considerable track record of assessing the viability of schemes and assessing the scope for Local Authority planning obligation requirements.
- 2.1.17 The purpose of this report is to provide our overview comments with regard to this individual scheme, on behalf of the Council - taking into account the details as presented. It will then be for the Council to consider this information in the context of the wider planning objectives in accordance with its policy positions and strategies.
- 2.1.18 In carrying out this type of review a key theme for us is to identify whether, in our opinion, any key revenue assumptions have been under-assessed (e.g. sales value estimates) or any key cost estimates (e.g. build costs, fees, etc.) over-assessed – since both of these effects can reduce the stated viability outcome.

3. Review of Submitted Viability Assumptions

- 3.1.1 The following commentary reviews the applicant's submitted viability appraisal assumptions as set out in their VA issued to DSP by the Council.
- 3.1.2 DSP was also supplied with a functioning electronic version of the appraisal used by the applicant. It is usually best practice in our experience to provide the working version of an appraisal, especially one using proprietary software, to ensure that both parties are reviewing a single appraisal, reducing the risk of transposition errors. In carrying out this review, DSP have, where necessary, made changes to the submitted appraisals where our opinion on assumptions differ from that of the applicant; sensitivity testing has also been carried out as required. This has enabled us to review the viability outcome with those adjusted assumptions and to test those against the applicant's version to see whether the viability outcome would be improved to the point that an affordable housing contribution (either on-site or via a financial contribution) could be made.
- 3.1.3 This type of audit / check is carried out so that we can give the Council a feel for whether or not the indicated profit and land value positions are approximately as expected – i.e. informed by a reasonable set of assumptions and appraisal approach.
- 3.1.4 Should there be changes to the scheme proposals this would obviously impact on the appraisal outputs.

Benchmark Land Value

- 3.1.5 In all appraisals of this type, the base value (value of the site or premises – e.g. in existing use) is one of the key ingredients of scheme viability. A view needs to be taken on this so that it is sufficient to secure the release of the site for the scheme (sale by the landowner) but is not assumed at such a level that restricts the financial capacity of the scheme to deliver suitable profits (for risk reward), cover all development costs (including any abnormalities) and provide for planning obligations as a part of creating sustainable development. This can be a difficult balance to reach, both in terms of developers' dealings with landowners, and Councils' assessments of what a scheme has the capacity to bear.
- 3.1.6 The RICS Guidance 'Financial Viability in Planning' states that:

- 3.1.7 *'A viability appraisal is taken at a point in time, taking account of costs and values at that date. A site may be purchased some time before a viability assessment takes place and circumstances might change.'*

This is part of the developer's risk. Land values can go up or down between the date of purchase and a viability assessment taking place; in a rising market developers benefit, in a falling market they may lose out.

A developer may make unreasonable/overoptimistic assumptions regarding the type and density of development or the extent of planning obligations, which means that it has overpaid for the site'.

- 3.1.8 The revisions to the Viability PPG and the new NPPF (Updated 24.07.18) now very clearly advise that land value should be based on the value of the existing use plus an appropriate level of premium or uplift to incentivise release of the land for development from its existing use. In regards to how land value should be defined for the purpose of viability assessment it states '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.'

- 3.1.9 The guidance defines existing use value as: 'the first component of calculating benchmark land value. EUV is the value of the land in its existing use together with the right to implement any development for which there are policy compliant extant planning consents, including realistic deemed consents, but without regard to alternative uses. Existing use value is not the price paid and should disregard hope value. Existing use values will vary depending on the type of site and development types. EUV can be established in collaboration between plan makers, developers and landowners by assessing the value of the specific site or type of site using published sources of information such as agricultural or industrial land values, or if appropriate capitalised rental levels at an appropriate yield. Sources of data can include (but are not limited to): land registry records of transactions; real estate licensed software packages; real estate market reports; real estate research; estate agent websites; property auction results; valuation office agency data; public sector estate/property teams' locally held evidence.'

- 3.1.10 It states that a Benchmark Land Value should:

- *'be based upon existing use value'*

- *allow for a premium to landowners (including equity resulting from those building their own homes)*
- *reflect the implications of abnormal costs; site-specific infrastructure costs; and professional site fees and*
- *be informed by market evidence including current uses, costs and values wherever possible. Where recent market evidence is used to inform assessment of benchmark land value this evidence should be based on developments which are compliant with policies, including for affordable housing. Where this evidence is not available plan makers and applicants should identify and evidence any adjustments to reflect the cost of policy compliance. This is so that historic benchmark land values of non-policy compliant developments are not used to inflate values over time.'*

3.1.11 It further states that: 'Where viability assessment is used to inform decision making under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan. Local authorities can request data on the price paid for land (or the price expected to be paid through an option agreement).'

3.1.12 In regards to assuming an alternative use value to determine BLV the guidance states 'For the purpose of viability assessment alternative use value (AUV) refers to the value of land for uses other than its current permitted use, and other than other potential development that requires planning consent, technical consent or unrealistic permitted development with different associated values. AUV of the land may be informative in establishing benchmark land value. If applying alternative uses when establishing benchmark land value these should be limited to those uses which have an existing implementable permission for that use. Where there is no existing implementable permission, plan makers can set out in which circumstances alternative uses can be used. This might include if there is evidence that the alternative use would fully comply with development plan policies, if it can be demonstrated that the alternative use could be implemented on the site in question, if it can be demonstrated there is market demand for that use, and if there is an explanation as to why the alternative use has not been pursued. Where AUV is used this should be supported by evidence of the costs and values of the alternative use to justify the land value. Valuation based on AUV includes the premium to the landowner. If evidence of AUV is being considered the premium to the landowner must not be double counted.'

3.1.13 It is therefore clear that the only acceptable approaches to defining a benchmark land value for the purposes of a viability assessment, is the EUV+ or exceptionally AUV.

3.1.14 In this case the benchmark land value is based on an estimate of the value of the three sections of the site, with values as follows:

1. Former milk depot (disused) - £350,000
2. Funeral Directors (commercial/retail unit) - £150,000
3. Bungalow (currently let on an assured shorthold tenancy) - £225,000

3.1.15 We have undertaken our own review of the BLV, as follows.

Former milk depot (disused) - £350,000

3.1.16 The VA assumes a rent of £34,300 per annum, and has applied a yield of 8.5% then deducted circa £50,000 for upgrade works to arrive at a figure of £350,000. The most recent rateable value (2017) for the milk depot was £30,000. Although we note an allowance for refurbishment costs has been made, we would question whether a rent at this level would be achieved in the current market, given the constraints of the building and the site mentioned in the VA. A review of sales of similar units in the area indicates an average sales value of £32/ft² which would give a value of approximately £250,000. There is not a perfect comparable for this property, but overall we consider the value may have been overestimated. Consequently we have tested a reduction in the assumed value of £150,000 to determine whether this is a significant factor in the overall viability of the site.

Funeral Directors (commercial/retail unit) - £150,000

3.1.17 We have reviewed the evidence within the VA, and carried out research using the Co-star commercial database, which indicates that rents on similar units within the area are on average £11/ft². Applying a lower rent (or a higher yield) to reflect the non-retail location of the unit indicates that the value will fall between a range of £120,000 to £180,000, so we do not consider this value to be unreasonable.

Three bedroom detached bungalow - £225,000

3.1.18 As stated in the VA, there is a lack of direct comparables. We have reviewed property sales locally and consider that the value is within the expected range. As a further check, we have assumed that the property is sold as an investment, with the current rent (as provided in the VA) of £775 per month being achievable. If this rent is capitalised at a

basic yield of, say, 4%, it produces a value close to £225,000. Overall we do not consider the VA valuation of the bungalow to be unreasonable.

- 3.1.19 Having considered the presented evidence and undertaken our own review of values locally, we are of the opinion that the value attributed to the site may have been overestimated, therefore we have tested the effect on viability of a reduced BLV.

Acquisition Costs

- 3.1.20 The VA includes a 1% allowance for agents' fees and 0.8% for legal fees. At a total of £13,050, these costs do not seem unreasonable. Stamp duty has also been included at a rate of £27,750, which we have verified is the applicable amount payable on an acquisition price of £725,000.

Gross Development Value – Private Residential

- 3.1.21 The supplied appraisal indicates sales values averaging £2,626/m², with 1 bed apartments achieving on average £2,670/m² and 2 bed apartments achieving £2,605/m².
- 3.1.22 In order to ascertain whether these are reasonable value assumptions, we have carried out our own desktop research of property values using property search engines RightMove, Zoopla and similar sources considering current / recent asking prices and where available sold prices in the locality.
- 3.1.23 Although advertised prices and sold prices are slightly higher in the area than included in the VA, many of the available comparables are within easier reach of Havant station than the subject site, and/or in more popular areas.
- 3.1.24 In our view, the values assumptions set out are conservative, but probably not unreasonable. Given that this is an outline application and it could be some time before the scheme is implemented, we have carried out sensitivity testing of the sales values to assess the effect on overall viability, should sales values turn out to be higher than assumed in the VA.
- 3.1.25 Ground rents have not been included in the appraisal. We acknowledge the recent Government stance on potentially significantly reducing ground rents, however we are required to look at the scheme as of today when ground rents can still be applied and until legislation is enacted it is not certain that the option to charge will be removed – particularly in relation to flatted developments. For the purposes of our sensitivity testing, therefore, we have assumed ground rents at £200 per annum for the 1-bed units and

£300 per annum for the 2-bed units, capitalised assuming a 5% yield. These assumptions are at the lower end of ground rents being charged on new developments, in our experience. This results in an addition of £384,000 to the development value.

- 3.1.26 It is worth noting that any improvement in the sales value assumptions (compared with a level set at the point of the appraisal) would most likely be reflected in an improvement in scheme viability. Whilst the opposite could also occur (the sales values could fall relative to the assumptions made), that is the developer's (applicant's) risk and such factors need to be kept in mind in making an overall assessment of the applicant's position.

Affordable Housing

- 3.1.27 No affordable housing is shown within the supplied development appraisal and no policy compliant appraisal has been supplied – as such we are unable to comment.

Development Timings & Development Finance

- 3.1.28 Finance costs have been assumed based on debt finance rate 6% per annum assuming 100% debt funding over the whole development period including all entry, exit and monitoring fees. This is within the typical range of finance costs in the current market and we have not adjusted this in our appraisal.
- 3.1.29 The appraisal indicates a 4-month lead in period, 18-month construction period. The overall construction period is probably not unreasonable and any changes would have a minimal impact on the scheme viability.
- 3.1.30 It is assumed that 10% of the scheme will be sold off plan, followed by a rate of two units per month thereafter, taking 30 months total. This is an unusually long sales period for a scheme of this nature and we have tested our appraisal using an assumption of 18 units being sold off plan and 3 units per month being sold in the subsequent months (the overall sales period therefore being 21 months).

Cost Assumptions - Build Costs, Professional Fees & Contingencies

- 3.1.31 The VA uses the RICS Building Cost Information Service (BCIS) database to inform the cost assumptions for this project. Construction costs of £1,367/m² have been used based on a lower quartile figure rebased to the Havant area.

- 3.1.32 The overall base build costs are in line with our review of BCIS data and as such we would not query those further in this case.
- 3.1.33 A further allowance of £50,000 has been included within the appraisal for the demolition of the existing units on the site. No evidence has been provided to substantiate these costs although in our experience they do not appear unreasonable.
- 3.1.34 The appraisal as presented appears to indicate a net: gross ratio of approximately 72% - with over 1800m² (19,793ft²) of communal areas. Within the development appraisal this has the effect of increasing the overall development cost as the BCIS rate is applied to the gross internal area of the development (including non-saleable space), not the net. In our view, the allowance appears high for a standard flatted scheme – more typically in the region of 10% - 15%. However we have reviewed the plans and the 72:28 appears to be correct, due to the amount of lobby/circulation space, corridors and bicycle storage. The Council would need to confirm dimensions from the planning drawings and bear in mind that as this application is being made in outline, the internal configuration of units may not follow what has been submitted as part of this review – a different scheme with a lower level of communal area would improve viability.
- 3.1.35 In addition to base build costs an allowance of 4% has been included for professional fees and 5% of build costs as a contingency allowance. The design fees and contingencies are considered within the normal range in our experience.

Cost Assumptions – Agent's, Marketing & Legal Fees

- 3.1.36 The applicant has assumed a total of 1.75% (of the gross development value) to cover selling, marketing and legal fees. Overall these assumptions do not appear unreasonable.

Cost Assumptions – Community Infrastructure Levy/ Section 106 Payments / Planning Obligations

- 3.1.37 The VA includes a CIL payment of £750,140, and Solent Recreation Mitigation Strategy contributions of £43,992.
- 3.1.38 It should be noted that any change in the chargeable sum would have an impact on the overall viability of the scheme as viewed through the appraisal - a reduction in the CIL cost assumption would improve the viability outcome and an increase would pull it downwards (looking at the effect of this assumption only). In all such reviews, we assume

that all requirements that are necessary to make a scheme acceptable in planning terms will have to be included.

Developer's risk reward – profit

- 3.1.39 The development appraisal has been carried out on the assumption of a profit level of 20% on GDV.
- 3.1.40 The RICS Guidance states that: 'When a developer's return is adopted as the benchmark variable, a scheme should be considered viable, as long as the cost implications of planning obligations are not set at a level at which the developer's return (after allowing for all development costs including site value) falls below that which is acceptable in the market for the risk in undertaking the development scheme. If the cost implications of the obligations erode a developer's return below an acceptable market level for the scheme being assessed, the extent of those obligations will be deemed to make a development unviable as the developer would not proceed on that basis'.
- 3.1.41 Latest Guidance within the Planning Practice Guidance is silent on the level return to a developer for the purposes of viability assessments in decision taking but does indicate that for plan making an assumption of 15% - 20% of gross development value may be considered a suitable return to developers.
- 3.1.42 Obviously, the level of profit assumed viable is often a matter of debate and certainly with no fixed rules. In our experience through both numerous site-specific cases and strategic viability review, typically a profit on GDV of between 15% - 20% for market housing (though now often as beneath 20%) and 6% for affordable housing serves as a reasonable guide. The upper end of this range was seen more commonly through and immediately following the recessionary period, where the risk of development was potentially higher than under current circumstances.
- 3.1.43 Profit requirements have since eased and overall in our experience a profit level not exceeding more than say 20% based on development costs is more representative of the range of scenarios that are put to us across a wide variety of sites and schemes. Indeed, within our wide experience of viability reviews such as this, a 20% profit on cost assumption is one we have also seen used by practitioners elsewhere. This is usually equivalent to circa say 16 to 18.5 % GDV on the market housing.

- 3.1.44 With lower profit requirements or expectations now being seen frequently in our experience, a fixed view of profit at 20% GDV on market housing no longer necessarily remains appropriate. With viability under pressure and under review to secure scheme delivery, applicants are showing flexibility on this.
- 3.1.45 We are therefore of the view that a 20% profit does not necessarily form a minimum or required rate and that a lower profit should be acceptable to enable a scheme to proceed.
- 3.1.46 In carrying out our appraisals, therefore, we have tested various scenarios to examine whether the scheme could provide a contribution to affordable housing whilst achieving what we consider to be a reasonable level of profit which reflects the risk involved in proceeding with the development. It should be noted that the appraisal as submitted, with no affordable housing, generates only 0.05% profit.

4. Summary & Overview of Findings

4.1.1 We have reviewed the submitted viability assessment based on the outline scheme as presented. Whilst, for the most part, standard assumptions have been used, there are some assumptions which we have queried, or where a difference of opinion exists. These are as follows:

- We do not consider it appropriate to omit a ground rental income, and we have run our own appraisal including an average of £246 per annum ground rent per flat.
- We also consider the VA assumption of the time it will take to sell the apartments to be overly pessimistic and have amended the sales period within our appraisal using a sales rate closer to similar schemes we have seen in recent years.
- We disagree with the principles set out in relation to development profit and have carried out our viability testing with a lower profit target in mind.

4.1.2 We also consider that the BLV of the site may have been overestimated. With the above changes applied in our appraisal (without adjusting the BLV) there is a significant improvement in the viability position. Running a version of the applicant's appraisal based on our stated ground rents and sales period improves the profit position from the originally stated £6,675 to £778,110. However this still represents only a 6% profit on GDV, before any affordable housing is included.

4.1.3 We have also run appraisals testing a lower value for BLV, however this has not made a significant difference to the profit position.

4.1.4 Whilst we are in broad agreement with the VA assessment of sales values, we have tested higher values, to give the Council an idea of the effect on viability of movements in sale prices, in the event that there is a significant change in the market in the period between outline planning and actual completion of the scheme.

4.1.5 Increasing the sales values by approximately £15,000 per unit from the VA assumptions has the effect of moving the scheme to a profit of 15% on GDV. However we consider these values to be at the top end of what could possibly be achieved for a scheme in this

location, and again, this assessment is based on nil affordable housing. This optimistic view, which would be more suited to a period of rapid house price inflation, moves the scheme to the borders of viability and does not show sufficient headroom for an affordable housing contribution.

- 4.1.6 We are also concerned that the assumed value of the site in its existing use could be overestimated in the VA, and have tested the effect on viability of a lower EUV. However this effect is less significant than variations in sales values or floor area/build costs (making an overall difference of circa 1% in profit).
- 4.1.7 Overall, it is our opinion that the scheme does not achieve what we consider to be a reasonable level of profit, even without any contribution to affordable housing. This is mainly due to the sales values, which in this specific area are low in relation to the costs involved in developing the scheme
- 4.1.8 In our view, there would need to be a combination of a downward view on the land assembly cost and a significant increase in sales revenue in order to lead to a scheme capable of providing any contribution (whether on site or as a commuted sum) to affordable housing.
- 4.1.9 However, it is noted that that application has been submitted in outline and it is not clear whether the scheme submitted as part of the VA would end up being replicated in practice. With all viability assessments submitted at outline stage we would have reservations about the Council accepting a reduced (or zero) contribution towards affordable housing when a different scheme from that submitted via the VA may produce a different outcome (either better or worse in viability terms). That is of course for the Council to determine, we can only review the viability information as submitted.
- 4.1.10 To provide some further context, we have also tested the effect of applying a net:gross adjustment more in line with other schemes of this nature. This has a significant effect on the profit level, increasing the profit level by approximately 10% of GDV. This on its own would not move the scheme as a whole to a position where affordable housing could be provided. However it is a significant effect and highlights the need for the Council to be sure that the scheme as put forward and for which a concession from policy is being sought matches the scheme that will eventually be developed.

4.1.11 We need to be clear that this is based on current day costs and values assumptions as described within our review based on the current scheme as submitted. A different scheme may of course be more or less viable – we are only able to review the information provided.

4.1.12 No viability appraisal or review can accurately reflect costs and values until a scheme is built and sold - this is the nature of the viability review process.

4.1.13 DSP will be happy to advise further as required.

Review report ends

February 2019

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