

Land at Warburton Lane, Trafford
LPA Ref: 98031/OUT/19
Appeal by Redrow Homes Limited
Appeal Ref: APP/Q4245/W/19/3243720

SUMMARY OF PROOF OF EVIDENCE RELATING TO CONSTRUCTION COSTS

OF

G A BUSHELL FRICS, MAE, QDR, APAEWE

ON BEHALF OF THE APPELLANT

DATED

SEPTEMBER 2020

Expertqs Limited

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1. Summary of Proof of Evidence

- 1.1. I, Gary Anthony Bushell of Expertqs Limited, am appointed by the Appellant to act as construction cost expert witness.
- 1.2. I am instructed by the Appellant to provide an expert opinion on the development construction costs relating to the outline planning application for 400 dwellings.
- 1.3. I am relying on the evidence in my expert report dated 20 February 2020 and appendices 1 to 25 (**CD B3 and Appendix 1 of this proof**).
- 1.4. In my opinion, the Appellant has provided sufficient information in the planning application documents to allow me to make a reasonable assessment of the likely development construction costs for the Site.
- 1.5. The Council has not commented on my costs, has not proffered any alternative costs of its own, and it has not attempted to narrow any areas of dispute relating to costs.
- 1.6. In its Statement of Case, the Council alleged that my abnormal construction costs are exaggerated without providing any evidence to support its allegation.
- 1.7. Having received my report and Appendices in February 2020, the Council appointed its third and final cost expert, Ms Sandford, on 12 August 2020. This delay by the Council left very little time for expert discussions on cost to take place.
- 1.8. During our limited discussions, Ms Sandford told me that she was instructed not to provide any alternative costs whatsoever.
- 1.9. After a short meeting of experts, Ms Sandford issued an incomplete SoCG the day before she went on holiday, giving me no opportunity to engage in any further discussions before the date for submission of the SoCG.
- 1.10. I have therefore submitted my own signed SoCG (with an appropriate declaration) setting out details of the limited items agreed and the items in dispute.
- 1.11. The disputed costs relate to the base build, garages, standard estate infrastructure, standard plot external works, standard plot service connections, and the site specific abnormal and extra over costs.

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1.12. The additional costs that have arisen since my February 2020 report was prepared are:

1.12.1. The costs of the effects of the Covid-19 pandemic lockdown which occurred after my February 2020 report was written.

1.12.2. The costs of the effects of the proposed enhanced Building Regulations which may be implemented in 2020.

1.12.3. The costs of the improvements to the Flixton crossroads. This was included in the S106 contributions when my February 2020 report was written.

1.12.4. The indexation of the construction costs in my February 2020 report from 4Q2019 to 4Q2020 (the date of the appeal hearing).

1.13. As a qualified and experienced professional chartered quantity surveyor and expert witness on viability cost matters, it is my opinion that the development construction costs set out in my February 2020 report and in my proof of evidence, are realistic and reasonable industry wide allowances to enable a developer to deliver the Site in accordance with the outline planning documents submitted by the Appellant to the Council.

1.14. This Summary of Proof of Evidence is to be read in conjunction with my Main Proof of Evidence. The signed Statement of Truth in my main proof applies equally to this summary.