

Our ref Pre-Submission LDP Representation
Your ref

11 March 2014

0048-5093-S2-2 MALDON DISTRICT COUNCIL

Princes Road
Maldon
Essex CM9 5DL



Enquiries to: Planning Policy
Email: policy@maldon.gov.uk

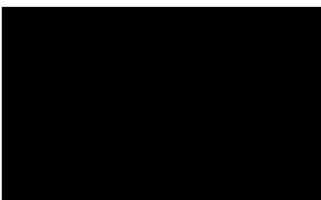
Dear Sir / Madam

Strutt and Parker's Representation to the Pre-Submission Local Development Plan public consultation on behalf of Bellway Homes Ltd, Essex County Council and the Plume Academy

The information contained within the representations listed below were made by David Fletcher, Associate Planner for Strutt and Parker LLP who are acting on behalf of Bellway Homes Ltd, Essex County Council and the Plume Academy and should be read in conjunction with the supporting evidence contained within representation: **0048-5093-S2-2**.

- 0048-5094-H1-1234
- 0048-5095-I3-2

Kind regards,



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Part 2 - Regulation 19 and 20 Town and Country Planning (Local Planning) (England) Regulations 2012 "Pre-Submission LDP" consultation

Please note that all comments on the Pre-Submission LDP consultation should be provided by completing Part 2 of this form. A separate completed Part 2 should be provided for each comment made within a representation.

2.1. To which part of the Maldon District Pre-Submission Local Development Plan (LDP) does this representation relate?

- | | | |
|---|--|----|
| a. Paragraph
(please specify paragraph number) _____ | b. Policy
(please specify policy reference) _____ | S2 |
| c. Proposals Map _____ | d. Other section
(please specify) _____ | |

2.2. Do you consider the Maldon District Pre-Submission LDP to be (tick as appropriate):

- a. Legally compliant** Yes ☒
To be 'legally compliant' the LDP has to be prepared in accordance with the Duty to Co-operate and legal and procedural requirements. This is required by Government guidance No ☐
- b. Sound** Yes ☐
To be 'sound' a Local Plan should be positively prepared, justified, effective and consistent with national policy. This is required by Government guidance No ☒
(if you **do not consider the LDP to be sound**, please complete section 2.3. below)

2.3. Do you consider the Maldon District LDP to be unsound because it is not (tick as appropriate):

- a. Positively prepared** ☐
To be positively prepared the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements
- b. Justified** ☒
To be justified the plan must be:
- Founded on a robust and credible evidence base;
 - The most appropriate strategy when considered against the reasonable alternatives.
- c. Effective** ☐
To be effective the plan must be:
- Deliverable;
 - Flexible;
 - Able to be monitored.
- d. Consistent with National Policy** ☐
The Plan must be consistent with Government guidance as set out within the National Planning Policy Framework

On the following pages, please explain why you think the Plan is unsound or not legally compliant, and set out any changes you feel should be made to the Plan to make the Plan sound or legally compliant.

Please note: As there will not normally be a subsequent opportunity to make further representations based on your representation at this stage, please include all the information, evidence and supporting information necessary to support/justify your representation and the suggested change(s) to the Plan. After this stage, further submissions will only be invited at the request of the Planning Inspector, based on the matters and issues the Inspector identifies for examination.

- 2.4.** If you consider the Maldon District LDP to be unsound or not legally compliant please explain why in the box below.

Please be as precise as possible. Please also use this space for any comments in support of the LDP.

Refer to attached statement

- 2.5.** Please explain in the box below what change(s) you consider necessary to make the Maldon District LDP legally compliant and sound.

Please be as precise as possible. Please explain why this change will make the Maldon District LDP legally compliant and sound. It will be helpful if you are able to put forward any suggested revised wording of the policies or supporting text.

Refer to attached statement

- 2.6.** Do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations ☐

Yes, I wish to speak to the Inspector at the hearing sessions ☒

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination

- 2.7.** If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.

In order to put forward our case for the formal allocation for Primrose Meadow, Maldon for a residential allocation.

This is the end of Part 2 (Regulation 19 and 20) of the response form. Please complete this form for each representation you wish to make. You only need to complete Part A once. Please submit all of your response forms together.



**MALDON DISTRICT PRE- SUBMISSION LOCAL
DEVELOPMENT PLAN CONSULTATION 2014- 2029
(FEBRUARY/MARCH 2014)**

Representation in relation to:

Primrose Meadow, Mundon Road, Maldon

Strutt and Parker LLP on behalf of:

Bellway Homes, Essex County Council and the Plume Academy

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1. INTRODUCTION

- 1.1 This representation has been prepared by Strutt and Parker LLP as a joint response on behalf of Bellway Homes, Essex County Council and the Plume School Academy specifically in relation to land at Primrose Meadow, Mundon Road, Maldon. As set out within the paragraph 8.30 of the Local Plan Consultation, the land is currently owned partly by the Plume School and partly by Essex County Council. Bellway Homes are acting with both parties in relation to the promotion of the development of the site for housing.
- 1.2 This representation has been prepared with input from the Plume Academy and Essex County Council, which confirms the importance of this site coming forward for housing in support of the wider strategic housing and planning policy objectives and as enabling development to support much needed educational improvements to the Plume Academy.
- 1.3 As required by the pre- submission consultation, this response has been prepared specifically in relation to Policy S2 (Strategic Growth), Policy I3 (Primrose Meadow Planning Brief) and Policy H1 (Affordable Housing). The relevant responses to each part of the consultation are set out under the relevant sections of the report.

Location of the Site

- 1.4 The site is situated within the town development boundary of Maldon as shown on figure 1 below:



Figure 1: Aerial Photo

- 1.5 Further information on the sustainable location of the site is appraised within section 3 of this report.

Relevant Planning Policy Background

- 1.6 The representation sets out planning policy appraisal of the Local Plan having regard to the National Planning Policy Framework. This includes an assessment of the credentials of the allocation of Primrose Meadow, as part of the emerging Local Plan.
- 1.7 In accordance with criteria set out in the Planning and Compulsory Purchase Act (2004) and the National Planning Policy Framework (NPPF), when allocating sites for development Local Authorities need to be satisfied that their plan is 'sound'. As set out in paragraph 12 of the NPPF to be sound, a development plan should be positively prepared, justified, effective and consistent with national policy. Namely that it is:

Positively Prepared- The plan should be prepared on a strategy, which seeks to meet objectively assessed development and infrastructure requirements and consistent with achieving sustainable development.

Justified- The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective- The plan should be deliverable over its period and based on effective joint working cross- boundary strategic priorities; and

Consistent with National Policy- The plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

- 1.8 This document provides an assessment of Maldon District's Preferred Options Consultation against the key points set out above, with reference to Primrose Meadow, Mundon Road, Maldon.

2. Policy S2: Strategic Growth

- 2.1 Policy S2 sets out that Maldon District plan for a minimum of 4,410 dwellings to be delivered between 2014 and 2029 (at a rate of 294 dwellings per annum).
- 2.2 The proposed strategy to deliver a minimum of 4,410 dwellings over the plan period of 2014 to 2029 is supported. The proposed strategy is considered to be in accordance with paragraph 47 of the NPPF, which states that to boost significantly the supply of housing, local authorities should:
 - Use their evidence base to ensure the Local Development Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area.
 - Identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their housing requirements to ensure choice and competition in the market for land.
- 2.3 The proposed housing target of a minimum of 294 dwellings per annum and 8.4 hectares of employment space indicates a positive approach of Maldon District Council, which accords with the key principles of the NPPF. The proposed growth figures are considered to provide a good balance between supporting growth in the District (as required by the NPPF), yet providing a considerate level of growth accounting for the rural characteristics of Maldon District.
- 2.4 The proposed growth of the District appears to be based on a credible evidence base and responds to objectively assessed needs for the District. In particular it is clear that the District Council have used the evidence within the Essex Housing Growth Scenarios Study (RTP, 2012), to inform the appropriate level of growth. The results of this growth scenario study set out that in order to avoid a decline in the working age population, that a minimum of 263 dwellings per annum need to be provided in the District per year. It is positive that this has been recognised by the District. The proposed delivery of a minimum of 294 dwellings per annum will help support a younger population and support employment growth in Maldon within the medium to long term.
- 2.5 As part of policy S2, the District Council has allowed a total windfall allowance of 330 dwellings. In relation specifically to land at Primrose Meadow, Mundon Road, Maldon the Council set out their principle support for the site being developed. It is not clear from the consultation document how policy S2 relates to Policy I3 and whether the proposed development of Primrose Meadow has been accounted for within the 330 windfall development figure. It is considered that Policy S2 should be amended to allow specifically for the delivery of housing on Primrose Meadow, Mundon Road, Maldon within the plan. It is considered that this should be formally allocated as a residential enabling development site for the purposes of the plan, with a capacity for 90 dwellings.
- 2.6 With the site being within the settlement boundary of Maldon, it is considered that this site could be delivered early in the plan period in order to help address Maldon District Councils acknowledged shortfall of 5 year housing land supply.

- 2.7 This matter is discussed in further detail as part of our consultation response to policy I3.

Recommended Change to the Wording of Policy S2

- 2.8 It is recommended that the following wording be added to Policy S2:

- S2(j) Primrose Meadow, Mundon Road, Maldon is allocated for 90 Dwellings to be delivered in years 0-5 of the plan period.

- 2.9 The above change is required for the Plan to be positively prepared, justified and to reflect the opportunity for Primrose Meadow to contribute to the housing requirement for the District and therefore be sound as required by the NPPF.

3. POLICY I3: PRIMROSE MEADOW PLANNING BRIEF

- 3.1 Policy I3 of the Local Plan relates specifically to the development of Primrose Meadow, Mundon Road, Maldon and states the following in relation to the development of the site:

‘On the site of Primrose Meadow, Mundon Road, Maldon shown on the Proposals Map, development will be permitted if the following criteria are met:

- 1) Development proposals must be in compliance with a site specific planning brief endorsed by Council;*
- 2) Evidence must be provided to the satisfaction of the Council that the future development will be essential to enable the expansion of the Plume School to meet projected needs;*
- 3) A minimum of 1.3 hectares of the site will have to be retained as amenity greenspace; and*
- 4) Development proposals must be in compliance with other policies within the LDP’*

- 3.2 The proposed allocation of development on the site as set out within Policy I3 is supported and is considered to be appropriate given the sustainable location of the site and given its location within the town development boundary of Maldon. The delivery of development will be critical in assisting funding the delivery of educational improvements to the Plume School Academy. The merits of the site in planning terms are set out under the following headings below. It is to be noted that that site has never been used for educational curriculum purposes.

Sustainable Location

- 3.3 The site is located within a very sustainable location. It is only a very short walk from Promenade Park and Maldon Leisure Centre and Swimming Pool, both of which are within 500 metres of the site. The Plume Secondary School is also within 500 metres of the site to the north, with Maldon Primary School just over 500 metres away. The town centre itself is also within walking distance being approximately 800 metres away. The proximity of the site to a range of local services and public open space (within Promenade Park) render it ideal for a residential allocation. In addition to having good pedestrian links, Mundon Road, which adjoins the sites western boundary, is a bus route to and from the town centre and to the surrounding towns of Chelmsford and Witham. Bus stops are located directly to the north of the site boundary.

Within the Development Boundary

- 3.4 As part of the emerging Local Plan the vast majority of growth is being delivered on Greenfield sites outside of the development boundary of Maldon and other key settlements in the District. The delivery of this site for approximately 90 dwellings will help reduce the pressure on releasing land from the countryside for development. This accords with the Core Planning Principles as set out within the NPPF.

Enabling Development: Educational Benefits to the Plume Academy

- 3.5 The Plume School Academy has identified a range of important educational improvements to the School Academy, which could only be funded by the development of Primrose Meadow. In accordance with Circular 05/2005, Section 106 funding from proposed development elsewhere in Maldon can only be used for expansion reasons, resulting from additional pupil pressure and cannot be used to solve problems related to current sub-standard facilities. Benefits of the Primrose Meadow proposals would be far reaching and would be of significant benefit to both the school and the community. Priorities that have been identified by the school academy (including but are not restricted to) the following:

Priority 1: Improved Sports Facilities

- 3.6 The school academy currently has sub-standard sports facilities on the site that do not meet school building bulletin modern day standards. The sports hall is currently in sub-standard condition and is used above its working capacity, which significantly affects the ability to teach sports at the school. In addition the current sports pitches have poor drainage and are waterlogged throughout most of the winter, which again affects delivery of the curriculum. The changing room facilities at the school date back to Victorian times and are currently cold and damp and not suitable for the modern day. The proposed development at Primrose Meadow could facilitate the following:
- New multi-use sports hall to address existing condition, suitability and capacity issues.
 - 3G artificial 3G grass pitch to allow all year round outdoor sporting activity and address current problems with water logged pitches
 - New sports changing/showering facilities to facilitate removal of cold and damp current changing rooms.
- 3.7 All of the above facilities would be open to the community as well as pupils at the school and the benefits would be considerable.

Priority 2: Improved Sustainable Transport Facilities

- 3.8 At present all vehicles, students/pedestrians, buses and bikes enter and exit the site via one single gate. As a result this area is very congested and provides a conflict between vehicles, pedestrians and cyclists, which presents a safety hazard for pupils. The school also do not currently have any formal cycle storage facilities on the site. The proposed development could facilitate the following:
- Improved bus and pedestrian access, which would include amendments to the front of the site to provide separate vehicle and pedestrian access and install 'in and out' bus lane to prevent buses having to reverse around the car park when it is full of pedestrians.
 - Installation of cycle storage facilities to encourage sustainable means of transport.

Priority 3: Expansion of Science and Technology Facilities

- 3.9 The Science and Technology facilities are currently over- subscribed and are used above- capacity, with not enough rooms to cater for the number of pupils who need the facilities. The proposed development of Primrose Meadow could help facilitate a new Science/Technology block, which will improve the educational facilities on the site.
- 3.10 Overall the educational and community benefits as part of this enabling development will be considerable. The level of improvements that can be delivered to the Plume School Academy will be dependent upon the level of Section106/affordable housing requirements, which could impact upon viability of some of the identified improvements. As set out within paragraph 72 of the NPPF local planning authorities should give great weight to the need to create, expand or alter schools in order to meet the needs of both existing and new communities. In accordance with the NPPF significant weight should therefore be given to the allocation of this site for residential development, with recognition of the benefits the funding from the development will provide to the Plume Academy. This is particularly important given that the Plume Academy is the only Secondary School within Maldon.

Policy I3: Policy Requirements

- 3.11 Policy I3 is considered to be consistent with National Policy and Effective as required by the NPPF when considering tests of soundness. However, in its present form the wording of Policy I3 is not considered to be fully justified and areas of the policy require further clarification from Maldon District Council.
- 3.12 In particular the policy does not reference what type of development would be acceptable on the site. This site will assist the Council in meeting their strategic planning policy objectives and also provides an enabling development to improve local educational facilities at the Plume School Academy. Furthermore given the location of the site surrounded by residential properties, a residential land use is considered to be the most appropriate. A residential development will be the highest value use and will be critical in helping to fund the needed educational improvements to the Plume School. In addition due to the residential area of the site, the land is best suited to a residential use.
- 3.13 In order for the policy to be fully justified and 'sound' as required by the NPPF it is considered that this change to the policy wording is required. Refer to paragraph 3.19 for the suggested policy wording.
- 3.14 In relation to the four policy requirements of Policy I3, the soundness of each against the four tests of the NPPF is assessed in turn:

1) Development proposals must be in accordance with a site specific planning brief endorsed by the Council

- 3.15 Within paragraph 8.34 of the plan it is set out that a Planning Brief endorsed by the Council will set out further detailed requirements for the future form and scale of development appropriate for the site.
- 3.16 Paragraph 153 of the NPPF states that each local planning authority is required to produce a Local Plan for its area, which can be reviewed in whole or in part to respond to changing circumstances. Paragraph 153 also states the following:

‘Any additional development plan documents should only be used where clearly justified’
- 3.17 In relation to Primrose Meadow, the site covers an area of approximately 3.04 hectares (7.51 acres). At planning application stage the development is very likely to be delivered in one phase as part of a Full application. At planning application stage discussions will be held with the Council and a range of statutory and non- statutory stakeholders in relation to the delivery and layout of the site. This will include holding a Public Exhibition with local residents. In accordance with Paragraph 153 of the NPPF, it is not considered that an additional development plan document requiring a Planning Brief to be submitted and endorsed by the Council is warranted for a site of this size.
- 3.18 This is particularly the case within Maldon, given the current shortage of land to meet Maldon District Council’s 5 year housing land supply. This land being within the development boundary of Maldon can be delivered in short term in order to help address the considerable current 5 year housing land supply shortfall and assist Maldon in maintaining an adequate supply for residential development as required by the NPPF. The requirement for a Planning Brief to be submitted on the site is likely to delay the delivery of development on the site and is not considered to be justified in planning terms and does not accord with national policy.
- 3.19 It is therefore recommended that this requirement is deleted from policy I3 or at a minimum further justification is provided on why a Planning Brief is required and what status the Brief will have in planning terms.

2) Evidence must be provided to the satisfaction of the Council that the future development needs will be essential to enable the expansion of the Plume School to meet projected needs.

- 3.20 This proposed policy intent is supported and it is positive that the Council recognise the importance that this development will have in supporting and enabling expansion of the Plume School Academy. However, it needs to be recognised that the development of this site for residential purposes has a wider strategic benefit. Under Academy Act regulations proceeds from the sale of the Plume interest are legally required to be re-invested into school facilities. The application will be accompanied by information relating to educational benefits of the proposals; however it is not considered that the application should be reliant solely on this information being

provided. It is recommended that this policy criterion is re- worded in accordance with the wording set out in paragraph 3.24 of this report.

- 3.21 The benefits to the Plume School Academy as a result of the development proposals have been set out in paragraphs 3.5-3.10 of this report. Further information on this can be submitted as appropriate at detailed application stage.

3) A minimum of 1.3 hectares of the site will have to be retained as amenity greenspace

- 3.22 The need for public open space and amenity greenspace is recognised and will form a detailed and important part of the planning application at the appropriate time. It is not however considered appropriate for the level of green space to be specified within the Local Plan and this provides a level of detail that is not appropriate for development plan stage. It is recommended that reference to a minimum level of 1.3 hectares of green space is removed from the policy, to allow for flexibility at detailed application stage (and is not based on robust and up to date assessment of open space need). At minimum additional information needs to be provided from the Council to justify where the level of 1.3 hectares of public open space has been derived from. As stated at 3.3 above the site is currently very accessible to local open space and recreational amenities. This change is required in order for the plan to be considered as sound.

4) Development proposals must be in accordance with other policies within the LDP

- 3.23 No objection is raised in relation to this requirement and this is considered to be sound in planning terms.

Policy I3: Recommended Policy Wording

- 3.24 It is recommended that the following changes (highlighted in bold) are made to policy I3 in order for it to be considered to be sound in planning terms:

*'On the site of Primrose Meadow, Mundon Road, Maldon shown on the Proposals Map **residential** development will be permitted if the following criteria is met:*

- 1) **The application will be accompanied by information setting out the educational benefits to the Plume School Academy as a result of the development proposals.***
- 2) **An area of the site will be retained as amenity greenspace, the quantum of which will be agreed at planning application stage.***
- 3) **Development proposals must be in compliance with other policies within the LDP.***

When considering suitable levels of financial contributions for the site, recognition will be given to the importance of this development in facilitating funding towards educational improvements of the Plume School Academy.'

4. Policy H1 Affordable Housing

- 4.1 Policy H1 of the emerging Local Plan sets out a policy requirement for 40% of dwellings to be delivered as affordable housing for applications within Maldon. It is understood that this figure has been informed by viability work undertaken by HDH Planning and Development Consultants.
- 4.2 Policy H1 sets out that *'any relaxation of the above (40%) requirements will only be considered where the Council is satisfied on a site by site basis, that such requirement will render any development proposals unviable.'*
- 4.3 The NPPF sets out within paragraph 47 that local authorities should boost significantly the supply of housing and seek to positively plan for growth. As a critical part of positively planning for growth paragraph 173 of the NPPF sets out that pursuing sustainable development requires careful attention to viability and costs in plan- making and decision- making. Plans should be deliverable.
- 4.4 It is considered that the proposed percentage of 40% affordable housing is not seeking to positively plan for growth and it will delay and jeopardise the supply of housing being delivered, in that it will place unsustainable viability costs on development. This policy is therefore not considered to be in accordance with paragraphs 47 or 173 of the NPPF.
- 4.5 When considering the matter of viability it is appropriate for Maldon District Council to liaise with adjoining District and Borough Council's regarding affordable housing delivery. As part of the background evidence base documents reference is made to work undertaken with neighbouring authorities as part of the Heart of Essex Growth Scenarios. The Heart of Essex included work with Chelmsford and Brentwood Borough Council. Chelmsford has an adopted policy of 35% affordable housing and Brentwood has set out a proposal for 35% affordable housing as part of their emerging Local Plan. House and land values are generally higher in both Chelmsford and Brentwood than Maldon District and therefore it is very surprising that a higher percentage of affordable housing is being sought in Maldon. This is especially case given that affordable housing needs are also high in the neighbouring authorities of Brentwood and Chelmsford. In addition Maldon should recognise that there have been a number of applications in Chelmsford that have not achieved 35% level of affordable housing due to viability reasons.
- 4.6 With values of land and houses being significantly higher in Brentwood and Chelmsford, a more suitable comparison with Maldon would be Braintree District where land values are more similar. Within Braintree District, the Council has an adopted policy that requires 30% affordable housing. This provides a realistic level of affordable housing, which allows development to be delivered viably and positively plans for growth as required by the NPPF. To use another example, within Castle Point Borough, where there is a chronic shortage of affordable housing, their emerging Local Plan sets out a requirement of 15% to 25% affordable housing, which is realistic given viability constraints.
- 4.7 The negative effect of setting affordable housing targets too high has been well documented by North Norfolk District Council, where they have a policy requirement

of 45% affordable housing. Since this policy was adopted in 2008, between the years of 2009 and 2013 it was reported that only 6 affordable units were built in the District and this formed part of a rural exception site rather than a market housing site. Following this North Norfolk have now sought to relax their affordable housing requirements to 20% across parts of the District to support growth.

- 4.8 The proposed 40% affordable housing provision within Maldon District Council could result in further stagnation of development, in a District which already has a significant housing land supply shortfall and a history of limited delivery. Policy H1 is not in accordance with National Policy and is not positively prepared or effective as required in order to be sound. In order for the Local Plan to be sound it is recommended that this policy wording is changed to require a maximum of 30% affordable housing, subject to viability assessment.

Recommended: Policy H1 Affordable Housing

- 4.9 It is recommended that the policy wording of Policy H1 is amended as follows (proposed changes have been highlighted in bold_:

All housing developments that provide a gross of five or more homes, or compromise an area of 0.5 hectares or larger, will be expected to contribute towards affordable housing provision to meet the identified need of the locality and address the Council's strategic objectives on affordable housing.

- ***Northern Rural, Maldon Central and South and Rural South: Up to 30%, subject to Viability***

Any relaxation of the above requirements will only be considered where the Council is satisfied, on a site basis, that such requirement will render any development proposals unviable.'

- 4.10 The above change is required in order for the plan to be considered as sound.
- 4.11 The comments made in this representation in relation to affordable housing policy H1, are general comments related to developments across Maldon. In reference to the proposed development at Primrose Meadow, it is considered that recognition needs to be given to the benefits of this enabling development in funding educational improvements to the Plume School Academy. A higher level of affordable housing will impact upon the level of funding available to the Plume School Academy as a result of the development proposals. Due regard will need to be given to this at the appropriate planning application stage.

5. CONCLUSION

- 5.1 This representation has set out the justification for allocation of land at Primrose Meadow, Mundon Road, Maldon for a residential use to accommodate 90 dwellings.
- 5.2 The proposed growth strategy for the District as set out in policy S2 and the proposed allocation of Primrose Meadow within policy I3 is generally supported. It is however, recommended that changes are made to both policies to formally allocate the site for a residential use. This is considered appropriate given the sustainable location of the site within the town development boundary for Maldon and the potential contribution to strategic growth objectives and the opportunity to maximise the significant educational benefits of developing this site
- 5.3 It is considered that Maldon District Council need to re- consider the proposed 40% affordable housing requirement in the District, which does not accord with paragraph 173 of the NPPF. It is recommended that a lower provision of affordable housing at a level of up to 30%, subject to viability would be appropriate in order to allow development to be delivered viably and to support growth as required by the NPPF. It is also recommended that amendments are made to Policy I3 of the Local Development Plan in order to allow development to be delivered early, which will help assist the Council in meeting its 5 year housing land supply shortfall.