

Matter 8/0167

**LDP EXAMINATION
MALDON DISTRICT**

MATTER 8

**AFFORDABLE HOUSING, HOUSING MIX and
SPECIALIST NEEDS
(H1, H2, H3 and H5)**

**on behalf of
COMMERCIAL ESTATES GROUP LTD**

Prepared by:

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1 ISSUE

“Whether Policies H1 and H5 with their associated text dealing with affordable housing are justified by the evidence, consistent with national policy and effective.”

1.1 The following statement has been prepared by CODE Development Planners Ltd on behalf of Commercial Estates Group Ltd in relation to the South Maldon Garden Suburb and site S2(a) in particular. I make particular reference to the Inspector’s question 2:

“Have the various sub-area requirements in H1 been set too low or high? What figures would be justified and why?”

1.2 CEG are satisfied that substantial progress on understanding and agreeing matters of viability generally has been achieved as reflected in the revised APP 13 to CED10 and discussed in the Statement of Common Ground for Matter 4. However, there remains a concern that the viability of the SMGS may be jeopardised by the Council’s interpretation of site specific viability testing under Policy H1. The Council’s current interpretation of viability testing being undertaken as part of their consideration of a current application for planning permission does not apply an appropriate balance to the considerations of viability guidance, market value as represented by comparable transactions and the provisions of paragraph 173 of the NPPF. Nor is it currently consistent with the approach taken by the Council’s own LDP evidence base.

1.3 The submitted representations, reference 0167-5385-H1-1234, suggest a reduction of the affordable housing requirement for the sub-area of SMGS to 20%. CEG believe, as explained in the supporting reports prepared by Pioneer, that a 20% requirement would be more appropriate given the costs of other infrastructure requirements and a realistic assessment of land value.

1.4 Discussions are continuing between MDC and the promoters to assist CEG in their understanding of the approach being undertaken by MDC in assessing scheme viability under policy H1.

1.5 CEG are hopeful that current discussions on the viability testing of site specific proposals will enable withdrawal of the current objection.