

Submission 14-1

Mr David Maher @ Dandara South East Ltd

1) Please confirm the evidence base document this comment relates to.

PS_106a Addendum Update to Viability Appraisal (August 2024)

To which part of the document listed in the question 1 above does this representation relate to?

2) Chapter and (if applicable) sub heading:

Appendix 1

3) Paragraph number or appendix:

Appendix 1 - Table 1B

4) Do you consider the evidence base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):

Yes No

Legally Compliant Selected Not Selected

Sound Selected Not Selected

5) Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments. The text box will automatically expand if necessary.

We note the inclusion of updated infrastructure information and costings as set out in Table 1B of the document. These costings result in an uplifted cost of c. £3.5 million compared to the earlier Viability Assessment (ref. PS_061B).

Dandara recognises that the Viability Appraisal (and the associated Infrastructure Delivery Plan) provides a high-level assessment of infrastructure costings for Local Plan purposes. Both documents are a "snapshot in time", providing assumptions on costings for future projects at the present time.

We note further discussions will take place with consultees and infrastructure providers at the application stage where detail on specific projects will be better known. Such obligations will also need to meet the CIL tests in terms of being directly related to the development at Paddock Wood and being necessary to make the development acceptable in planning terms.

Against this background, Dandara reserves the right to comment further on obligations that arise during the planning application process. As such, the benchmark land value for the site will be better known as dictated by, inter-alia, market values at the time of both the planning application and subsequent site acquisition.

6) Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified in question 5 above where this relates to legal compliance or soundness. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward

your suggested revised wording of any policy or text. Please be as precise as possible. The text box will automatically expand if necessary.

See above.

7) Please use this box for any other comments you wish to make. The text box will automatically expand if necessary.

See above.

8) If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)

No, I do not wish to participate at the examination hearing session