

## **APPENDIX 2: CONSULTATION QUESTIONS AND SUGGESTED RESPONSES.**

*Q1 Do you think that the suggested thresholds below which contributions will not be sought are set at an appropriate level?*

Bearing in mind the restriction that comes into force in April of this year regarding the pooling of financial contributions, it will be for ECC to judge whether (in particular) the education threshold is set at the right level. It makes sense to seek the 5 contributions from larger schemes that would generate more funding than smaller schemes. However, ECC need to be careful in adopting a 'one-size-fits-all' approach. It may be that different limits could be set for pre-school, primary and secondary education as the pooling limit will effect each type of education differently. After it has analysed the responses to this consultation, ECC might wish to consider whether the 25 dwelling threshold is at the correct level.

*Q2 Do you think the approach suggested to determine the suitability of land for education and other uses, where developers would submit land compliance information with their planning applications, will speed up the planning process?*

No, the checklist seeks a high level of information which is considered excessive for determining a planning application. The requirements are more to do with a land transfer issue than a change of use issue.

*Q3 Do you support ECC's view that, where appropriate, joint use community buildings from which a range of services can be delivered should be included on larger developments?*

Shared-use buildings are an efficient use of land, and can work well as part of community hubs within larger residential developments. A good local example is the community hall at Priors Green, which is located next to a local shopping parade, primary school and day nursery. Location is the main key to making the building a success, but thought needs to be given to travel planning to discourage car journeys, reducing the need for large numbers of car parking spaces or on-street parking.

*Q4 Do you think that the Consumer Price Index (CPI) should be used to inflation proof the Travel Plan Monitoring fee? If not can you suggest a more suitable alternative index?*

All indices have their advantages and disadvantages, so it is difficult to say which one best reflects the change in monitoring costs. What is important is that the fee is indexed to reflect changed costs over time.

*Q5 Do you think that the proposals for the formula for the calculation of commuted sums for maintenance are acceptable?*

Yes, but embedding standard commuted sums in the guidance document (they are Appendix L) could cause confusion for developers when the sums are reviewed, which would usually be annually. Unless the guidance document is to be updated annually, it would be better to keep the commuted sum details in a stand-alone document.

*Q6 Do you think that the proposals for commuted sums for Sustainable Drainage Systems (SuDS) are acceptable?*

As ECC is offering to adopt SuDS systems, it is right that commuted sums should be sought. As set out in the draft guidance, the commuted sum should reflect the acceptance that routine maintenance of SuDS systems is often more frequent and expensive than conventional drainage systems, increasing short term costs. The District Council will not be adopting any SuDS systems.

*Q7 Do you feel that the treatment of equality and diversity in the Guide is appropriate?*

Yes, these issues are covered mainly under sustainability objective 8.

*Q8 Do you consider that the Sustainability Appraisal of the Guide deals with the sustainability issues related to it adequately?*

The ten sustainability objectives set out in the report seem to be comprehensive. Comparing each service area to the sustainability objectives (page 65 of the environmental report), it is clear that the largest positive impacts will be on objectives 6, 7 and 8. This reflects that the prime contents of ECC S106 agreements are education and highway obligations.

*Q9 Do you have any other points on the Guide that you would like Essex County Council to consider?*

The Council agrees that new bus services or enhancements should be provided at the time of first occupation in order to encourage modal shift. It is thought unlikely that a developer would be willing to subsidise bus services until they become commercially viable, as this could become an open-ended commitment. It is therefore right that the draft guidance accepts that there may need to be cash or time limits to the subsidy.

The Council supports the incorporation of the education supplement into the main guidance document. This is more user-friendly for developers.