

Date: 9<sup>th</sup> April 2015**Plainview Planning – ‘Household Projection Evidence’**

The Council are planning to continue with their 310 annual dwelling target as they feel that the DCLG projections are broadly in line with the NMSS analysis. In respect to this position we wish draw attention to the key components of the NPPG which would indicate that the annual housing target for Maldon should be increased.

Paragraph 015 (Reference ID: 2a-015-20140306) of the NPPG states that the household projections published by DCLG should provide the starting point estimate of overall housing need. The key point to emphasise is the projections are ‘the starting point’ only and other issues need to be taken into consideration such as affordable housing.

Given Maldon’s rural location, Paragraph 017 (Reference ID: 2a-017-20140306) is also relevant in the consideration of the housing figure as this paragraph states that local housing need surveys may be appropriate to assess the affordable housing requirements specific to the needs of people in rural areas. In this respect, Paragraph 29 (Reference ID: 2a-029-20140306) states:

*The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.*

In Section 14, the Council’s latest SHMA states that there is a need for 154 affordable dwellings per annum over 15 years. Paragraph 14.11.9 states that based on achieving a 40% affordable housing target, these levels of need would require total delivery levels of 390 dwellings per annum.

We are mindful that the Council in Policy H1 of the Pre-Submission Plan and subsequent correspondence following the EIP hearings has indicated that the main strategic allocations at Heybridge and Maldon will only deliver 25% affordable housing. Policy H1 also states that other developments in the areas classified as Maldon North, Rural South East Higher and Rural South East

Lower would be expected to deliver less than 40% affordable housing. The Council is not proposing a 40% affordable housing target across the District and so the assumptions in the SHMA are underestimated.

Given that the Council are only proposing a total of 310 dwellings and that only approximately affordable 70 dwellings are proposed per annum on the identified strategic sites, it is clear that the proposed housing target is significantly insufficient to meet the Council's affordable housing need over the plan period.

It is our opinion that the housing target should be increased to meet the Council's identified affordable housing need.