

Maldon District Council's comments on Chelmsford City Council's response to the Barton Willmore SHMA

Note: These comments only relate to the suggestion in the Barton Willmore submission that Maldon should be treated as part of a Colchester Housing Market Area (HMA) and not as a standalone HMA.

The correct approach to HMAs on examination

We would submit that the correct approach to be taken at Examination is whether any of the other proposals for the definition of the HMA is demonstrably preferable to the HMA identified by the Local Planning Authority. This is supported by a very recent decision by an Inspector examining the Central Bedfordshire Development Plan. In his letter of 16th February 2015 at para 73 (provide link) the Inspector says 'none of the alternative methods for assessing the HMA submitted in evidence and discussed would be demonstrably preferable in the particular circumstances of the wider area'. We would commend this approach to the Inspector.

On a secondary point, paragraph 74 of the Inspector's letter notes that a wider HMA would be likely to lead to a series of interlocking HMAs across a wider area and would be unlikely to be coincident with the administrative boundaries of any one Authority or group of Authorities.

The Housing Market Geography

Maldon District Council agrees with the Mid-Essex Consortium that whilst, the Centre for Urban and Regional Development Studies (CURDS) study of HMAs is a sensible starting point, it is only a starting point. As PBA has noted, that work was based on 2001 census data and needs to be updated. Moreover, as that and other work on HMAs has found, the boundaries of HMAs are not clear cut: in many places they overlap or small changes in the criteria used result in very different boundaries. This is echoed by a recent comment from the Inspector examining the Uttlesford Plan¹:

'Past SHMAs covering much wider areas of Essex/North London/Hertfordshire/Cambridgeshire demonstrate that the history of trying to define and get to grips with Housing Market Areas hereabouts has been rather complicated.'

¹ See paragraph 3.3 of the Inspector's conclusions on his Examination of the Uttlesford Local Plan (ULP) at <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=4506&p=0>

Containment of house moves

One of the criteria which can be used to identify HMAs is the extent to which local house moves are contained within the area. PBA discuss the data put forward by Barton Willmore in Figure 3.4 of their study (Page 18) but conclude that it has no bearing on whether Braintree, Chelmsford, Colchester, Maldon and Tendring form an HMA. This is because the data presented is for moves across local authority boundaries and does not include moves within the local authority areas. The Maldon SHMA² sets out the appropriate data. This was based on the 2001 census as the 2011 results were not available at the time. The 2011 census data shows that 63% of local moves to an address in Maldon were from elsewhere in Maldon. Whilst 63% is below the threshold suggested in the PPG³, that threshold is described as “typically 70%”, indicating that it should not be regarded as a hard and fast cut-off. 63% is sufficiently close to 70% for Maldon to be regarded as a sensible area for planning for housing. The 2001 and 2011 census data is set out below.

Place of Previous Residence		
	Maldon (2011)	Maldon (2001)
Maldon	2,297	2,544
Brentwood	51	59
Braintree	286	230
Chelmsford	520	640
Colchester	201	109
Basildon	153	222
Rochford	52	33
Southend-on-Sea	81	74
Total	3,641	3,911
Local Moves %	63.1%	65.0%

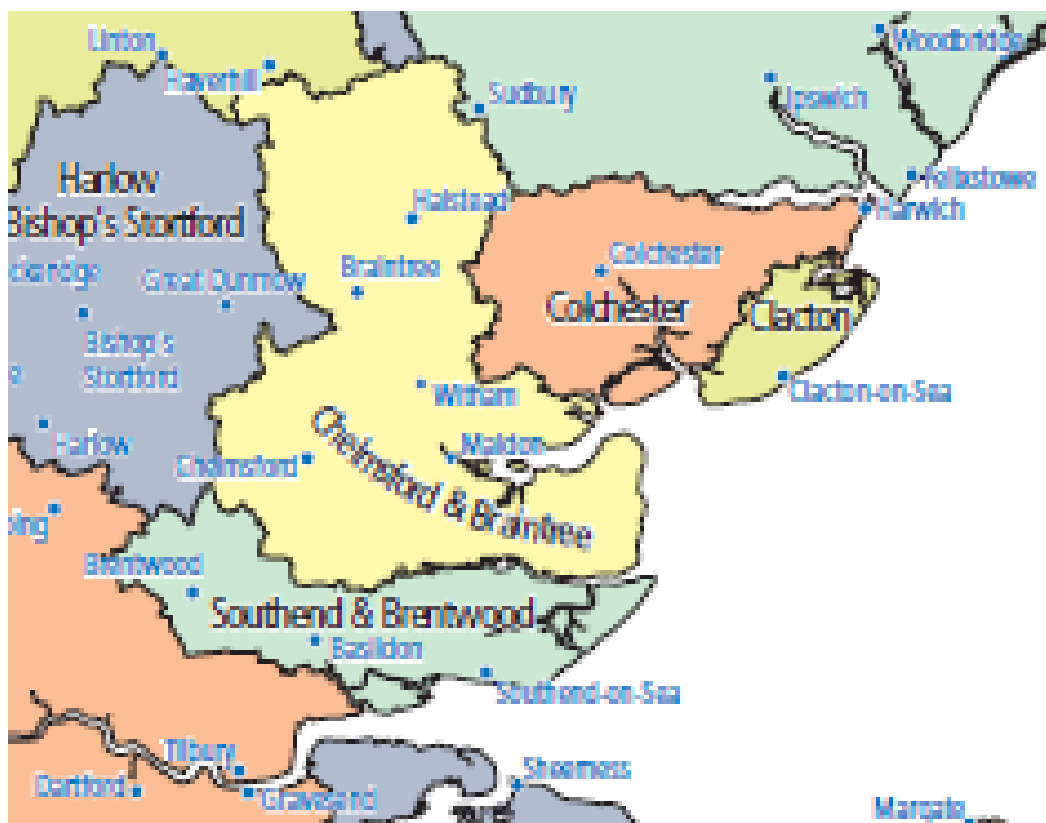
Travel to Work Areas

The PPG suggests that Travel to Work Areas (TTWAs) is another basis which might be used to identify housing market areas (paragraph: 011 Reference ID: 2a-011-20140306). The map below is a detail from the ONS’s map of TTWAs⁴. This is based on 2001 census data as the ONS have yet to issue similar maps based on the 2011 data. Note that the ONS divide the suggested Colchester HMA into three separate TTWAs: Chelmsford and Braintree, Colchester, and Clacton, with Maldon included in the Chelmsford and Braintree area. This further illustrates that the suggested Colchester HMA is by no means a clear cut or self-evident HMA and that on this criteria an alternative geography would make at least as much sense.

² Insert EiP reference

³ See paragraph: 011 Reference ID: 2a-011-20140306

⁴ <http://www.ons.gov.uk/ons/guide-method/geography/beginner-s-guide/maps/travel-to-work-areas-2001.pdf>



Other Factors

Whilst statistics such as those for house moves and travel to work are an important element in determining housing market areas other aspects of the local geography can also be relevant. Maldon's transport links, with only one A road, and the physical barriers on three sides, creates an area which is naturally fairly self-contained. Moreover, the predominantly rural character of the area makes it rather different from the other authorities in the suggested Colchester HMA. This is illustrated by Maldon's much lower population density than the other local authority areas⁵:

Population density	Persons per hectare
Braintree	2.4
Chelmsford	5.0
Colchester	5.3
Maldon	1.7
Tendring	4.1

Source: ONS

⁵ From: 2011 Census: population and household estimates for Wards and Output Areas in England and Wales, published 23 November 2012

Practical considerations and on-going joint working between neighbouring authorities

Maldon has undertaken extensive Duty to Cooperate exercise with neighbouring authorities during the preparation of the Local Development to consider any cross boundary issues (Please refer to document SD06 - Duty to Cooperate - Statement of Compliance). However, at the time the Council was embarking on the production of its Local Development Plan the other authorities were at different stages in their planning cycles, and the option of a joint Local Plan was neither available nor realistic. It should be noted that even with the emerging joint housing study between the four mid-Essex authorities, there still doesn't seem to be any appetite for the production of a joint Local Plan between the authorities. This is evidenced by the two recent public consultations on two separate local plans published by Colchester Borough Council⁶ and Braintree District Council⁷ respectively.

Given the urgent need to have a Local Plan and a housing target in place, the only option available to the Council was therefore to progress with its own Local Development Plan, which in any case, given the distinctiveness of the District from its surrounding areas and the degree of self-containment, seemed the preferable course of action. Moving forward, the Council will continue to work closely with neighbouring authorities on cross boundary issues including strategic growth and infrastructure delivery (please refer to DOC113 for further information).

Conclusion

For the above reasons it is concluded that the Barton Willmore proposal for the HMA is not 'demonstrably preferable' to Maldon's identified HMA, and the Council's identified HMA should therefore be supported.

⁶ <http://www.colchester.gov.uk/planningconsult>

⁷ http://www.braintree.gov.uk/info/200230/planning_policy/701/new_local_plan/4