

Date: 12<sup>th</sup> March 2015**Plainview Planning – ‘Addition Viability Note for LDP Examination – The Maldon and Heybridge Garden Suburbs’**

Table 10 of the Viability Note states that the affordable housing requirement for site S2a of Policy S2, as set out in the submission LDP is unviable. The Viability Note instead recommends that the affordable housing requirement be reduced to 30%.

We consider that this change would represent a significant modification to the plan that has implications in respect to the overall housing requirements and spatial strategy. We would also seek to ensure that there is a consistency in the Council's decision making in respect to such changes.

The reduction of affordable housing requirement from 40% to 30% on site S2a would result in a loss of 100 affordable dwellings being delivered at this site. It will also result in a material reduction in the number of affordable dwellings that the plan is seeking to deliver.

The NPPG in Paragraph 29(2a) 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.*

Based on the Council's affordable housing requirements set out in Policy H1 of the submitted LDP, which requires between 25% and 40% affordable housing dependent on the area, there would be a need for between 250 and 400 additional dwellings to deliver this newly arising affordable housing shortfall.

This is clearly a very critical issue as the September 2014 SHMA indicates that the affordable housing need for the District is now between 130 and 201 dwellings and that between 319 and 390 dwellings are required per annum to enable the delivery of affordable housing, based on a 40% affordable housing target. As the Council is no longer proposing a 40% affordable housing target at its largest strategic allocation, it is highly unlikely that the Council can meet its objectively assessed need with its

current spatial strategy. The annual housing target in Policy S2 will therefore have to increase significantly to accommodate the additional affordable housing shortfall.

Given the need to increase the annual housing target as a result of this recommendation, there is a need to increase the supply of housing in less constrained locations such as at North Fambridge.

We are also conscious that the recommendation to reduce the affordable housing requirement at site S2a is inconsistent with the approach they appear to have taken in respect to the allocation at North Fambridge. During the discussions of 'Matter 7: Rural Housing' at the Examination, the Council appeared to suggest that they will propose to remove North Fambridge from Policy S2 as this allocation was deemed to be unviable. No viability calculations were undertaken to categorically determine whether this allocation was unviable or not. But if it were deemed to be unviable with 40% affordable housing, then adjustments to the affordable housing quota should have been explored. To ensure consistency in their decision making, the Council should either:

- Remove both Site S2a and North Fambridge in Policy S2 if these sites are unable to deliver 40% affordable housing because of viability concerns; or
- Retain both Site S2a and North Fambridge in Policy S2, but instead readjust their affordable housing requirement to a point where it is viable.

In the case of North Fambridge there is potential to significantly increase the capacity of the allocation, which would assist in making up the shortfall identified above, but also enhance the viability of the allocation.

We consider that the recommendation to reduce the affordable housing requirement at Site S2a reaffirms our view that the Local Development Plan is not sound as it has not been robustly justified evidence and has clear deliverability concerns.