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Dear Mrs Copsey,

MALDON LOCAL PLAN – ALLOCATED NORTH HEYBRIDGE SITE

We write on behalf our client, Gladman Developments, in relation to the allocation and viability of the North Heybridge site, and in particular site S2(d).

Whilst we do not propose to go into detail about the sites as they are well known to you, we feel it is necessary to set out some background relating to the allocation of the site as part of the emerging Maldon Local Plan. North Heybridge Garden Suburb (as it has been known during the plan making process) was allocated to provide 1,235 new homes as part of almost 4,500 homes required across the district between 2014 and 2029. Site S2(d) is allocated to provide 1,035 as part of the wider Garden Suburb site. Alongside the Local Plan, an 'Infrastructure Delivery Plan' document has been produced by the Council to assess and quantify the needs and capacity of infrastructure across the District. As part of this process, North Heybridge Garden Suburb is expected to provide in excess of £35 million towards infrastructure improvements.

To ensure the development would still be deliverable, it was deemed necessary by the Council in their own viability studies to reduce the affordable housing requirement to 25% for S2(d), with 40% (the emerging Local Plan requirement) across the remainder of the Garden Suburb site. The 25% requirement was agreed for S2(d) despite the residual value of £314,393 (per gross ha) falling below that of the viability threshold of £330,000.

In addition to this, it has been suggested during the Local Plan examination that the 'Flood Alleviation Scheme', which accounts for £7.7million within the infrastructure budget, is removed from policy requirements but replaced by a Sustainable Urban Drainage system scheme of the same cost to the developer. Due to the design of such a scheme, extra land is required for its implementation which in turn would further reduce the residual value from the £314,393 per gross ha.

We are not convinced about the modelling that lies behind the viability calculations in relation to the Flood Alleviation Scheme or the Sustainable Urban Drainage scheme and would welcome more information on the cashflow assumptions as in our experience large urban extensions with significant infrastructure burdens can often take years to be realised.

Notwithstanding the points above on viability, the emerging Plan assumes that the North Heybridge site will deliver the required homes within a 15 year period. Using the Council's stated affordable housing requirements for each of the sites within the Garden Suburb, and accounting for open market units only, this assumes a sales rate of almost 5 units a month. Having spoken to a number of developers building out in the local area, this figure is simply not realistic and the sales rate is closer to 2-3 per month. On this basis, and using the same figures as before, the site would take up to 37 years to build out and sell which would have significant implications on the housing numbers for the emerging Plan as a whole.

In our opinion, the site is barely viable with 20% affordable housing which falls well below both the adopted (30%) and emerging (40%) affordable housing requirement. It was stated during the Local Plan hearings that the site was initially allocated to provide the Flood Alleviation Scheme, the requirement of which has now been removed from the policy. As a result of both of these points, the site fails to meet the assessed needs of the District, its viability & deliverability are questionable, and its inclusion as an allocated strategic site is therefore unsound. Similar issues also pertain to the other large South Maldon Garden Suburb allocation which has a significant level of infrastructure requirements which call into question the viability of the scheme.

It is suggested that the Council reviews smaller sites across the District for allocation to meet the NPPF requirement for a rolling five year housing supply where infrastructure costs would be lower and the correct affordable housing requirements can be met. Gladman are currently promoting a number of sites in the district (Southminster, Burnham-on-Crouch, Tillingham, Great Totham and Maylandsea) all with policy compliant 30% affordable housing provision which will contribute significantly to the provision of much needed market and affordable housing and can be delivered in the first 5 years of the Plan. The provision of affordable housing is a key priority for the authority which is stated throughout the Plan and the information detailed above shows that the allocation of the Garden Suburbs sites will not deliver this objective in full.

I trust this letter will be of assistance but please let me know if you require clarification on any of the above points.

Yours sincerely,

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