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16th March 2015

Dear Sir

MDLP EiP Extra Work Tasks : Matter 6 - Proposed Further Modifications to Policy S2 and relevant support text in relation to Reserve Sites

This letter sets out our responses on behalf of Strutt & Parker (Farms) Ltd to the above.

The Inspector will recall that our representations to the Examination with regard to this matter focussed on identified Reserve Site RE3 - East of Burnham-on-Crouch within Policy S2. For the Examination, we made comments on the Matters Issues and Questions (MIQs) identified by the Inspector and Maldon District Council's (MDC) Additional Modifications.

In this respect, MDC's proposed further modifications provide for two suggested changes to Policy S2 and the reserve sites:-

1. The omission of reserve sites from Policy S2.
2. A proposed approach to bring forward sites for housing in the event that there is a shortfall in supply and completion.

With regard to point 1, our representations to the EiP sought to make the case that the identification of the reserve sites by MDC was generally sound, albeit we considered that allocations would be more in order to address housing supply and the requirement for Local Plans to be flexible, having regard to MDC's response to the MIQs.

Clearly, the Inspector will in due course consider the issue of housing supply for the Plan generally, the representations submitted by others that the MDLP is unsound in this regard and whether there may be a role for reserved sites and a mechanism for review if it is found that MDC's objectively assessed need for housing is not sound.

At the hearing sessions, the Inspector raised doubts for the necessity for the reserve sites to be positively identified in the absence of clear evidence on deliverability. The Proposed Further Modifications do not provide further information or explanation from MDC on the reasons to now exclude the sites from Policy S2 but simply proposes removing the sites. This is unfortunate and we await the Inspector's conclusions on this matter.

With regard to point 2, we welcome MDC's attempts to simplify the mechanism for a review of housing supply in the proposed further modification. However, we remain concerned that the timescale for review is not relevant to the circumstances of land supply for Maldon. In particular, we know that there is a current shortfall in supply and that the Council have previously been advised at its meeting on 10th July 2014 (Document DC108) that applications considered to be sustainable, in accordance with P14 of the NPPF, contributing positively to the five year supply of deliverable housing should be considered favourably.

Against this background and the urgent need to boost significantly the supply of housing (p47 of the NPPF) we question whether it is reasonable to wait for 3 years from the adoption of the LDP to then consider actions to address the shortfall.

We would therefore suggest that the policy should be amended as follows (with amendments shown in red):

*Housing and infrastructure delivery will be monitored against the housing trajectory on an annual basis. The Council will use **annual** monitoring data (as stipulated by the Monitoring Framework) to assess whether actions are required to increase housing land supply to meet the objectively assessed needs of the District. If ~~the monitoring data produced after three years from the adoption of the LDP, and annually thereafter,~~ demonstrates there is **an -15%** under supply and expected housing completions **in the following five years** are insufficient to compensate for ~~this a shortfall in a 5 year supply of deliverable land for housing,~~ the Council will undertake a fast track partial review of the Plan to ensure the housing needs of the District can be fully met together with the necessary infrastructure capacity.*

We trust these comments will be taken into account by the Inspector in his Interim Conclusions on housing matters for the MDLP.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andy Butcher'.

Andy Butcher Dip Tp MRTPI
Associate Partner

Cc: Mr D Coleman – Strategic Planning Policy Manager, Maldon District Council, Princes Road, Maldon, Essex CM9 5DL