

December 2014

Respondent reference number 0006

Statement 1 on behalf of Robert Mulholland & Co Ltd and Ives Property Holdings Ltd.

Matter 2: Strategic Housing Growth – overall numbers S1 and S2

Issue 2: Does policy S2 establish an appropriate distribution of development and growth to the towns and settlements in the District which will deliver development in sustainable locations? How else should it be done?

It is essential that the spatial planning policies protect the distinctive character of Maldon's rural settlement. However, it is critical these rural settlements do not stagnate or decline but instead, meet the needs of all generations of their communities, particularly younger households and those in need of affordable housing. Such a spatial strategy can also assist in improving the provision of rural area services, facilities and infrastructure as well as helping to strengthen village community cohesion.

The Taylor review of rural economy and affordable housing July 2008 recommended that planning policy should look to create and maintain sustainable rural communities in order to underpin their long-term vitality and viability. The spatial strategy as currently proposed in S2 will in effect make some communities less sustainable, condemning many smaller rural communities as unsustainable in principle with no way for local communities to attract vital inward investment. Given the importance of providing housing to accommodate local people across the rural area, in addition to rural affordable housing, it is considered that the smaller villages should not be denied development. The spatial policy approach should be focused on housing that is appropriate to the scale and character of the village, allowing investment to improve the long term health of existing fragile rural communities. Such an approach will provide scope for a greater provision of rural areas affordable housing and an increased flexibility that could be dealt with through Neighbourhood Planning.

In our view, the approach to S2 should better emphasise a positive growth of the existing rural villages through the development of appropriate rural businesses and housing, including affordable housing that contributes towards maintaining and strengthening these centres as hubs of activity both socially and economically.

This representation contests that the Council have identified an arbitrary total figure to the rural areas that does not appear to have been at all qualified in the evidence base equating to less than 10% of the total housing delivery target set for the district.

The Council has previously suggested that in light of consultation responses on the emerging plan, draft policy should clarify how the scale of growth proposed should reflect local character and constraints. The Council has acknowledged that it is a fundamental objective of the emerging plan to ensure that the District's strategic growth brings improvements to the quality of life for all.

The Council says this has led to a strategy that seeks to concentrate development on the district's main settlements, mainly Maldon, Heybridge and Burnham-on-Crouch. However, the Council also acknowledges that the district is predominantly rural in character with a significant proportion of people living in dispersed communities. When this is considered alongside the key objectives in section 3 of the NPPF supporting a prosperous rural economy, then it is clear that policy S2 should allocate a greater proportion of housing delivery to the rural villages. We would say this should more closely match the option 2 approach to spatial strategy or a 25% proportion of the total identified housing requirement. This way, the Council could be sure of satisfying the NPPF's requirements that planning policies *"should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development"*. The NPPF goes on to say in Section 6 - delivering a wide choice of high quality homes, that to promote sustainable development in rural areas *"housing should be located where it will enhance or maintain the vitality of rural communities"*. The NPPF also recognises that encouraging some market housing in rural areas will facilitate the provision of additional local area affordable housing to meet local needs.

We say therefore that policy S2 does not properly comply with the objectives of the NPPF relating to sustainable rural areas housing, that an arbitrary allocation to the rural areas has been identified and that to promote a balanced and sustainable spatial strategy (allowing investment in fragile rural settlement), a greater proportion of the required housing target should be allocated to the rural areas.

Overall, it is suggested that Policy S2 should be amended to enable residential development in a broader range of settlements than as currently drafted in policy and that this can best be achieved through Neighbourhood Planning.

We request that policy S2 para 4 be altered as follows:

"An appropriate minimum level of new development as outlined in the table below will be directed to the rural villages to support rural housing needs, local services and facilities and the rural economy. Strategic growth in the rural villages will be related to the settlement hierarchy reflecting the size, function and physical capacity of the settlement and will not result in unsustainable spatial patterns to the detriment of the wider area. Sustainable strategic growth to an appropriate scale in the rural villages will be encouraged where it is considered necessary to support the long term health and viability of those settlements. Growth should be appropriate to the scale and character of the village and encouragement given to managing such development through Neighbourhood Planning or public consultation."

Word count – 906