

Matter 2: Strategic Housing Growth – overall numbers

Q2: Does Policy S2 establish an appropriate, clear, effective and soundly based distribution of development and growth to the towns and settlements in the District, which is fully justified with robust and up-to-date evidence and which will deliver development in sustainable locations? How else should it be done?

This question covers a number of issues, which we cover as follows:

In terms of **clarity** and **effectiveness**, we generally consider Policy S2 sets a clear framework for the delivery of new homes. It sets out what needs to be delivered, where, and when.

However, in our written representations, we highlighted two areas where additional clarity was needed. Firstly, the Policy makes clear that the 4,410 homes required is a minimum requirement, and therefore the policy also needs to make clear that the individual site targets should not be treated as maxima. Secondly, the policy needs to make clear that the phasing shown should not inhibit earlier delivery. We have suggested the addition of two footnotes to the table to provide that clarity.

In terms of whether the strategy is **appropriate** and provides a **soundly based distribution**, we consider that the settlement hierarchy and settlement geography of Maldon District points logically and sustainably to the broad distribution set out in Policy S2.

Although having two separate identities, and being separated by the River Blackwater, Maldon and Heybridge are closely related settlements, with the Causeway Industrial Estate at Fullbridge creating a physical linkage, and with the two adjoining settlements sharing many of the same services and facilities.

Together, Maldon and Heybridge have a combined population of around 22,500¹ (over a third of the total population of the district in this one area), and the town is the administrative, cultural and social heart of the district. The settlements also provide just under 40% of the total number of employee jobs in the District,² with the Causeway and Maldon town contributing a significant number of these, in addition to significant areas of employment in Heybridge west ward.

Burnham-on-Crouch, the next largest settlement, is a third of the size, at around 7,500 persons, and has some 2,000 employee jobs. Located on the Dengie peninsula, Burnham is relatively remote from other major centres of population, whereas Maldon and Heybridge lie closer to Chelmsford, the most influential settlement in the heart of Essex.

The remaining 50% of the population is accommodated in the rural areas, but Maldon is a large district (36,000 ha, according to para 1.25 of the LDP), and predominantly rural in nature, and therefore the rural population is spread over a wider area, and across some 31 rural parishes. Although there are sources of employment in the rural areas (principally in the western and northern parts), there are no major sources of employment. Only the Parishes of Southminster and Mayland, both around 4,000 persons each, have any significant concentration of population.

¹ 2011 Census – Figures taken from MDC 2013 AMR (Ref: EB050)

² Source: ELR 2009 (Table 3.1 and Figure 3.2) (Ref: EB035a)

The precise distribution of development needs to take account of a range of factors, including the availability of suitable land, utility and service constraints, and access to services. In principle, however, and in the absence of any over-riding or irreconcilable capacity constraint to development, it must be the most appropriate strategy to provide the majority of the new development at the main settlements of Maldon and Heybridge, followed in turn by Burnham-on-Crouch, and finally with a smaller proportion of development to meet locally arising needs in the more rural areas. The broad distribution of development in Policy S2 is soundly based.

Finally, in terms of whether the Policy will **deliver development in sustainable locations**, we have already commented above on the appropriateness of Heybridge and Maldon as the principal settlements and the most sustainable location for development, in terms of services and local economy.

The sustainability advantages of the North Heybridge and South Maldon Garden Suburbs is not solely related, however, to the general sustainability advantages of being located adjacent to the principal settlements. There are two other important benefits for sustainable development arising from the two proposed Garden Suburbs which would not be achieved by any other significantly different development option, which are:

- (1) The location of these sites, and especially the North Heybridge Garden Suburb, provides an important opportunity to deliver a package of infrastructure which not only addresses the needs of the development, but also has the benefit of delivering improvements to existing infrastructure for the benefit of existing communities. Relief of existing traffic flows in the centre of Heybridge, and in particular the removal of larger vehicles which do not actually need to go in to Heybridge, can only be achieved in practice via the construction of the Broad Street Green Road to Langford Road link. Delivery of the long outstanding Heybridge Strategic Flood Alleviation scheme, which will provide a remedy to existing flooding issues in Heybridge itself as advocated by Paragraph 100 of the NPPF (4th bullet point), can only be delivered in conjunction with the North Heybridge Garden Suburb. Whilst the combination of both strategic developments helps to generate funds to invest in other physical and social infrastructure in the area, North Heybridge Garden Suburb uniquely provides an opportunity to co-ordinate the delivery of new housing with the achievement of practical solutions to existing problems.
- (2) The concentration of housing delivery in to these two large strategic sites, provides a means by which new development can be provided alongside the social and community infrastructure necessary to support the resulting population, and in a format that will provide a high quality environment through application of Garden Suburb principals.

We are not aware of any other potential development option that could deliver both the place-making and scale advantages of the proposed new Garden Suburbs, with their on-site social and community infrastructure, and the particular opportunity that the North Heybridge Garden Suburb provides to resolve existing infrastructure limitations at the same time as serving the needs of the new development.

**Q3: Is this the right strategy in Policy S2 to meet the objective assessment of housing need (OAN)?
Are there other housing growth options that have not been properly explored? If so, what?**

Our response to question 2 above covers the first part of this question.

In terms of the second part of the question, we consider that the production of the LDP has properly explored reasonable alternative options, evidenced in particular through the consideration of a range of different spatial patterns of development by the Council's Planning and Licensing Committee between May and December 2013.

Q4: Are the strategic allocations too large and complex to be delivered on time? If so why?

We do not believe that the NHGS allocation is too large and complex to be delivered on time. In development terms it is a realisable and deliverable scale and one where the principal developer has extensive experience in the procurement of strategic infrastructure through appropriate delivery frameworks. This matter is covered also in our Matter 3 Statement, and to a large extent also in the North Heybridge Garden Suburb Position Statement submitted to the Examination (Document 103), but in brief, we would comment as follows:

1. Multiple site ownership is not an issue here – although there are three development parties, around 85% of the new homes required are allocated on land under the control of a single developer (Countryside), and each is capable of independent implementation (e.g. no difficult legal issues to resolve). In addition, all of the land necessary to deliver the key social and physical infrastructure falls within the control of Countryside (see also Document 103 Page 3 para 2.7-2.12);
2. There are no unresolved technical or infrastructure issues – as set out in Document 103 (Page 4 paragraphs 2.13 and 2.14) there is already a high degree of consensus as to the infrastructure requirements for the North Heybridge Garden Suburb, and joint working between the development interests and the key infrastructure providers has already resulted in a high degree of certainty on both the nature and deliverability of the requisite infrastructure (in respect of Hatfield Peverel, please see Appendix 1 of our Matter 3 Statement, and separate Statement of Common Ground on highway matters with MDC and ECC);
3. The housing trajectory for the strategic sites is broadly realistic – the Council has resolved to invite applications for planning permission in advance of the conclusion of the LDP process to assist in the timely commencement of development, and Countryside are preparing a planning application for submission accordingly. Although we consider that delivery of 25 units in 2016/17 is now unlikely, the delivery of 1035 units on the principal allocation S2d over a 12 year build period from 2017-2029 at under 90 units per annum on average (including affordable housing) is achievable. Indeed, the site has the potential to be delivered in advance of the projected end date of 2029, hence our concern that the phasing shown in the table in Policy S2 should not be used to frustrate earlier delivery. The Viability Appraisal (EB040a) at para 7.57 assumes a build rate of between 25 and 30 units per sales outlet per annum, which is a cautious approach. With two sales outlets achieving 3 sales per

month, the development would deliver 72 market units per annum. Assuming 25% affordable provision, the scheme would deliver the 775 market units required in just over 10 years, rather than the 12 indicated in the trajectory.

In terms of commencement of development on site S2(d), Countryside are in the process of preparing a planning application at the current time. A request for a Scoping Opinion to guide the Environmental Impact Assessment was submitted in September 2014, and a response received from Maldon District Council in December. A Planning Performance Agreement is currently being agreed between the Council and Countryside to ensure the timely processing of an application, which it is intended to submit following these Hearing sessions, with an expectation of a resolution to grant during 2015. Detailed consents for infrastructure and the first phase of housing would follow in the first half of 2016, leading to commencement of infrastructure works and residential commencement in 2017.

As noted at point 3 above, achievement of 1035 units by 2029 is not dependent upon adherence to the broad programme above.

Q17: Are the Council's suggested modifications to the supply table in policy S2 and the Housing Trajectory bar chart (Figure 4) at Refs 045 and 046 in SD04b acceptable? In particular, in showing that delivery from the Rural Allocations Plan and large site allocations are adjusted backwards to begin in 2016/17?

In respect of the North Heybridge Garden Suburb, and so far as site S2d in particular is concerned, the commencement of residential development in 2017/18 is now considered more realistic, though not essential to overall delivery by 2029.