

**Examination of  
the Maldon  
District Council  
Local  
Development  
Plan**

**Matter 6: Strategic  
Housing Growth –  
Reserve Sites S2**



## **INTRODUCTION**

1. This Statement is made on behalf of MAZ Homes, as a formal response to the Inspector's Matters, Issues and Questions for Matter 6: Strategic Housing Growth – Reserve Sites S2. MAZ Homes is promoting the land at Church Road, Wickham Bishops (SHLAA ref site 5002) as a sustainable residential development of c.94 dwellings.
2. This Statement responds to the Inspectors questions 2, 4 and 6 in respect of Matter 6, and should be read in conjunction with our previous representations.

## **QUESTION 2**

3. Policy S2 of the Strategy states that reserve sites are identified so that they can provide “flexibility and contingency” in the event that, amongst other things, further sites are required to provide a 5 year supply of deliverable land for housing.
4. In order for a reserve site to provide flexibility, it should be able to come forward at relatively short notice, and should be readily available. Most commonly, the reason why the delivery of sites is delayed, are infrastructure constraints, which will affect the timing and release of sites. Therefore, it is important that any reserve sites are either free of, or have minimal, infrastructure requirements.
5. The Inspector has questioned whether the Plan is sufficiently flexible enough to adapt to rapid change, with reference to NPPF paragraph 14. Whilst we welcome the identification of reserve sites, we do not consider that the identified sites are capable of coming forward quick enough to allow for rapid change.
6. The Strategic Housing Land Availability Assessment (SHLAA) (EB056b) states that each of the identified reserve sites have infrastructure or delivery requirements, which, whilst not preventing delivery of the sites, evidently would prevent the sites coming forward rapidly to ‘plug a gap’ in a five year housing land supply.
7. Additional or alternative reserve sites should therefore be identified which have minimal or no infrastructure requirements, and could come forward rapidly to meet more immediate needs. These sites should be sites which are capable of being delivered in their own right, and rather than simply being reserve sites, should be identified sites for the rural area which would otherwise be expected to come forward in a different time period.



8. The land at Church Road, Wickham Bishops (SHLAA ref site 5002), is one such site. This site is capable of delivering c.94 dwellings, and has no major infrastructure constraints, as recognised in the SHLAA (EB056b).
9. This site is not simply a reserve site, that would only come forward in the event the allocated sites do not come forward, but a site which can deliver a proportion of the 420 rural houses required by the Strategy. However, given that the Rural Sites and Allocations Plan is unlikely to be adopted for a number of years, the identification of this site as a Reserve Site now means that it could come forward early to assist in providing a 5 year supply of deliverable land for housing, rather than later in the Plan period.
10. We therefore propose that Policy S2 be amended to identify the land at Church Road as a Reserve Site which would not come forward prior to its identification in the Rural Sites and Allocations Plan, unless it is required to contribute to the five year supply of deliverable housing land.
11. With regard to timescales, the Inspector is requested to note that the land at Church Road, Wickham Bishops, is readily available now, and not in the 6-10 year period that the SHLAA “assumes”. This was clarified in our SHLAA submission, which was appended to our March 2014 representations to the Pre-Submission Local Plan consultation.

#### **QUESTION 4**

12. As stated above, whilst we do not question the suitability of any of the reserve sites for housing, we note with interest the findings of the SHLAA. For site 8038 the SHLAA states a “*Major infrastructure upgrade will be required if the site is to be developed as a strategic allocation*”. For site 9004 “*Known sewerage issue, pylon and power line will also have to be re-directed*”, whilst for site 3533h “*Joint partnership of landowners required and upgrade of access to the north of the site needed*”.
13. None of these matters are necessarily items which would prevent delivery, but they are factors which would prevent the sites being delivered quickly, and we question how such sites could result in a ‘flexible and adaptable’ Plan.

#### **QUESTION 6**

14. Whilst the amendments to the text are welcomed, we do not feel these provide sufficient trigger mechanisms for the release of the sites. For example, the Council should always be working constructively and proactively with developers. Such a statement should not be a trigger mechanism but standard practice for the Council.



15. Moreover, the suggested modifications are not definitive enough, and require further commitment to ensure delivery. Instead, we suggest that the wording is amended as such:

*“If any monitoring data produced after two years from the adoption of the LDP demonstrates that there is a 20% deviation in housing delivery for 2014-2019; and 2019-2024; and a 10% deviation for 2024-2029, the Council will introduce management actions to address housing delivery shortfall which include: a review of the phasing of allocated sites; a review of housing targets and associated policies; the release of Reserve Sites; and the allocation of additional sites to meet target if required by the review of housing targets.”*