

*Examination of the  
Maldon District Local Plan*

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

January 2014



## Matter 6: Strategic Housing Growth – Reserve Sites (S2)

*Issue: Whether policy S2 and its associated text dealing with reserve sites is justified by the evidence, consistent with national policy, and effective*

- 1.1 Given the complex uncertainties arising from the strategic allocations in Policy S2, it is highly unlikely that the Council will be able to demonstrate a 5 year land supply on adoption the plan. This Local Development Plan is therefore ineffective as defined by Paragraph 49 of the NPPF, and as such is unsound.
- 1.2 The Council must therefore both identify and release more development land in the District. The plan needs to demonstrate maximum flexibility to ensure delivery of an OAN in accordance with the NPPF.
- 1.3 The Council has identified land west of Maldon (450 dwellings) and land north of Scraley Road (350 dwellings) as potential reserve sites. These sites are in Maldon and Heybridge respectively, however do not believe that the identification of these actually provides any flexibility or indeed a realistic contingency. Instead, we consider that the Council should identify more strategic allocations within a number of differing locations across the District.
- 1.4 As mentioned under Matters 2, 3 and 4 there are many complex and costly highways and education infrastructure projects that need to be delivered in advance or alongside of the strategic allocations in Maldon and Heybridge. If the strategic allocations are delayed then the onus will be on these reserve sites to deliver the required infrastructure.
- 1.5 However, the reality is that if the strategic allocations are delayed, it will be a result of a delay in the delivery of the necessary infrastructure projects, particularly highways and education. These delays would also prevent the sites at Scraley Road in Heybridge and land west of Maldon from being delivered and as a result the



identified reserve sites would fail to contribute the 5 year housing land supply or indeed the longer-term housing supply.

- 1.6 Consequently, there is need to identify other sites away from the Maldon and Heybridge urban area that do not have the infrastructure limitations and constraints of this area, for example, locations such as North Fambridge.
- 1.7 The reserve sites aspect of Policy S2 has also been poorly drafted. This policy advises that planning permission for a reserve site will only be given when there is a need through land supply monitoring to maintain a five year land supply. There is no specified trigger for when a 'reserve' site or sites will be released. It also does not make any allowance for lead-in times to allow for infrastructure provision and master planning. As such there is no indication of what these lead-in times might be. There is no indication as to which of the reserve sites will come forward or when or in what sequence. This will in turn delay their eventual delivery and consequent risk to maintaining a five year land supply.
- 1.8 This is entirely at odds with the Government's requirement to significantly boost housing supply. The policy would actually constrain land supply in an entirely inflexible way and will result in a plan that is unable to respond effectively to any changes in market conditions.
- 1.9 In principle reserve sites should be allocated through the Local Development Plan in order that the sites can gain planning consent, together with any legal agreements, and site preparation can be undertaken before the five year land supply position becomes critical.
- 1.10 As set out in response to previous matters raised by the Inspector it is our view that the Local Development Plan needs to also provide for sites beyond the Maldon and Heybridge urban area to accommodate a significant number of dwellings in the first 5 year period of the plan.
- 1.11 Indeed the plan should set out how it intends to provide for delivery of development for its area over the whole plan period (paragraphs 156 and 157 of



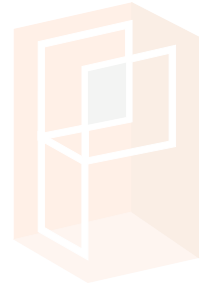
NPPF). The plan is effectively setting itself up to fail on housing delivery and continue its historic under-provision against housing need.

- 1.12 It would be more appropriate to identify a number of sites at a variety of different locations across the District, such as North Fambridge. This is likely to deliver a reliable and continuous supply as such an approach would deliver a variety of housing products in differing locations, rather than concentrating development upon the Maldon and Heybridge urban area.



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