



**Maldon District Council
Maldon District Local Development Plan**

Inspector's Matters (April 2016)

The Housing Market Area

Statement made on behalf of the Local Planning Authority

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STATEMENT

MATTER: THE HOUSING MARKET AREA

Inspector's Matter

The Council takes its administrative area to be the Housing Market Area (HMA). It appears that the SHMA Update 2013 [EB010e] and the 2014 SHMA [EB010f] support this stance, to some extent at least.

However, this position is disputed by other participants. Some consider that the HMA should be a wider area – that Maldon falls within a Colchester HMA, also involving Colchester, Chelmsford, Tendring and Braintree. It is argued that from the Council's figures, the level of commuting for work is such that the HMA should be more widely drawn.

I understand from the hearings that the other aforementioned authorities have commissioned a study to establish the most appropriate HMAs for their areas. Maldon has not been involved in this largely, as I understand it, because the Maldon District Local Development Plan had recently been, or was about to be, submitted for examination.

On this point, I am not wholly clear about the Council's stance. Considering the level of commuting, does the Council, on reflection, now consider that it would be more appropriate for future plan-making to re-consider the HMA? If so, should an early review of the Local Development Plan be required to address this matter? I would be grateful for clarification of your view on this issue.

Maldon District Council response

Introduction

1. The Council's *Hearing Statements in Response to Inspector's Matters, Issues and Questions for Legal Compliance and Housing Policies* (January 2015)¹ sets out the Council's approach to the Housing Market Area (HMA) in Matter 2: Strategic Housing Growth – overall numbers S1 and S2. This confirms that the Council considers that Maldon District should be considered as a single housing market area (paragraph 2.7).
2. During February to March 2015 the Inspector requested additional information ('Extra Work Tasks') on a number of topics, including responses to a submission by Barton Willmore. *Maldon District Council's Comments on Chelmsford City Council's Response to the Barton Willmore Strategic Housing Market Assessment* [EWT-M02-02]² provides further explanation of the Council's approach to the geography of the HMA. This

¹ Available to view at:
http://www.maldon.gov.uk/info/856/local_development_plan/83/maldon_district_local_development_plan_ldp/13#pagenavbox

² Available to view at:
http://www.maldon.gov.uk/downloads/file/2428/mdc_comments_on_to_bwshma_20_02_2015

statement sets out practical reasons why - given the distinctiveness of the district from its surrounding areas, the degree of self-containment and the different stages of plan preparation of the District Council and its immediate neighbours - the preferred option is to adopt a single HMA for Maldon District.³

Planning Practice Guidance

3. Regarding the definition of HMAs, Planning Practice Guidance (PPG) states that housing market areas can be broadly defined by using three different sources of information:

- house prices and rates of change in house prices
- house migration and search patterns
- contextual data (for example travel to work area boundaries, retail and school catchment areas)⁴

The Council has used this approach to defining the HMA, and has utilised a number of the data sources listed under each heading.

4. Following an analysis of cumulative pieces of research across several documents, the Council believes that Maldon District is a good approximation for a housing market area to plan for. Relevant documents include:

- *Supplementary Statement to 'Assessing Maldon's Housing Requirements'* [EB098C]⁵
- *Final Strategic Housing Market Assessment (SHMA)*, DCA, September 2014 [EB010f]⁶
- *Maldon District Council's Comments on Chelmsford City Council's Response to the Barton Willmore Strategic Housing Market Assessment* [EWT-M02-02]⁷

5. The Council's SHMA 2014, demonstrates through ONS migration data that the District is 65% self-contained in terms of household migration (Section 3.10). Although this is

³ See EWT-M02-02, page 4

⁴ Paragraph: 011, Reference ID: 2a-011-20140306

⁵ Available to view at: <https://www.maldon.gov.uk/LDP/pre-submission/1%20Spatial%20Vision%20and%20Development/EB098c%20Supplementary%20Statement%20to%20Assessing%20Maldon's%20Housing%20Requirements.pdf>

⁶ Available to view at: <https://www.maldon.gov.uk/LDP/pre-submission/4%20Housing/EB010f%20Strategic%20Housing%20Market%20Assessment%20September%202014.pdf>

⁷ Available to view at: http://www.maldon.gov.uk/downloads/file/2428/mdc_comments_on_to_bwshma_20_02_2015

lower than the benchmark identified by PPG as “typically 70 per cent”,⁸ it is influenced by longer distance moves from London. At 65%, the Council considers the self-containment sufficiently close to 70% to be regarded as a sensible area to plan for. In terms of travel to work patterns, there is also a high level of employment self-containment for an authority close to London with good transport links.

Neighbouring authorities

6. Since the completion of the work outlined above, the District Council’s neighbouring authorities - Chelmsford City, Braintree District, Colchester Borough and Tendring District Councils - have undertaken further work to determine objectively assessed housing needs. The results of this work are set out in *Objectively Assessed Housing Need Study*, Peter Brett Associates, July 2015.⁹ This study uses the National Housing and Planning Advisory Unit’s (NHPAU) HMA boundaries as a starting point (Section 2: Defining the Housing Market Area). The study has assessed the implications of excluding Maldon District from the NHPAU HMA and has concluded that this will not make a significant difference; the study finds that Maldon District Council’s decision to assess its housing need independently is in no way detrimental to the consideration of the HMA for the four authorities (paragraphs 2.25-2.27).
7. These authorities are continuing to progress their new Local Plans to different timetables to Maldon District Council’s Local Development Plan (LDP):
 - Chelmsford City Council is expecting to submit its Local Plan for examination in Autumn of 2017
 - Colchester Borough Council is expecting to submit its Local Plan for examination in Spring 2017
 - Braintree District Council is expecting to submit its Local Plan for examination in Spring 2017
 - Tendring District Council is expecting to submit its Local Plan for examination in Spring 2017 however, it has also decided to seek further clarification from the consultants on the joint Objectively Assessed Housing Need Study

⁸ Paragraph: 011, Reference ID: 2a-011-20140306

⁹ Available to view at:

<http://188.39.22.30/sites/default/files/documents/planning/planning%20policy/Objectively%20Assessed%20Housing%20Needs%20Study%202015.pdf>

Conclusion

8. The Council considers that Maldon District should be considered as a single HMA. In undertaking work for their own Local Plans, the neighbouring authorities have concluded that the inclusion of Maldon in a larger NHPAU-defined HMA has a limited effect on the area's containment. The different authorities, Maldon and its neighbours, are capable of addressing their housing needs through their respective HMAs and Local Plans and there is no need for a single HMA to accomplish this.
9. Regarding a future plan review, the District Council acknowledges the guidance in PPG which states: *"Where Local Plans are at different stages of production, local planning authorities can build upon the existing evidence base of partner local authorities in their housing market area but should co-ordinate future housing reviews so they take place at the same time."*¹⁰
10. Maldon District Council will continue to work with its neighbours through the Duty to Cooperate. However, at this stage, it is considered that an early review option would be difficult to coordinate given that, as set out above, the neighbouring authorities are expecting to adopt new Local Plans throughout 2017 and 2018.

¹⁰ Paragraph: 007, Reference ID: 2a-007-20150320