

# Maldon District Council Five Year Housing Land Supply Advisory Note

## 1.0 Introduction

1.1. This advisory note provides an update on the production of the submitted Maldon District Local Development Plan (LDP), and provides clarification on the Council's housing land supply position. It explains how the Five Year Land Supply (FYHLS) for Maldon District is calculated and also outlines the latest progress being made to deliver strategic allocations within the submitted LDP.

## 2.0 Maldon District Local Development Plan

2.1. The submitted LDP will constitute the new up-to-date statutory Development Plan once adopted, replacing the Maldon District Replacement Local Plan 2005. The LDP, together with all relevant evidence and supporting documentation, were submitted to the Secretary of State for Examination-in-Public (EIP) on 25 April 2014. Public hearing sessions for the housing and infrastructure related policies (LDP Policy S1, S2, S3, S4, S6, S7, S8, H1, H2, H3, H5, H6, I1 and I2) took place between 20th January and 4th February 2015. Interim findings on the soundness and legal compliance of the housing and infrastructure policies of the Plan were issued by the Inspector on the 8<sup>th</sup> May 2015 (see Appendix 1).

2.2. In summary, the Inspector recommended the LDP to be withdrawn because Policy H6 (Provision for Travellers), and by implication the Plan as a whole, was considered unsound and that the Inspector would not rectify this through recommending main modifications or by suspending the Examination to give time for the Council to resolve concerns regarding Policy H6. The Inspector's Interim Findings only commented on LDP Policy H6, stating that it would not be '*relevant or helpful to make any comments now on the other housing and legal compliance matters [including the Council's objectively assessed housing need and proposed strategic housing allocations] because they would soon be overtaken by events*' (paragraph 9 of the Inspector's Interim Findings, Appendix 1). The Inspector, however, noted the Council's land supply position is rapidly improving as a result of its proactive approach to bring forward LDP allocations and other housing sites (paragraph 6 of the Inspector's Interim Findings).

2.3. Following the publication of the Inspector's Interim Findings, the Council requested that findings on all the LDP policies subject to examination be provided to assist the Council in identified an appropriate approach to progress the Plan. The Inspector responded to the Council on 3<sup>rd</sup> June 2015 (IED17, Appendix 2), and outlined in detail why LDP Policy H6 is considered to be unsound. The Inspector did not identify any further policies in the LDP which were unsound, and reiterated that as a consequence of LDP Policy H6 being unsound, the Plan as a whole must be considered to be unsound. In relation to the delivery of housing in the District, paragraph 38 on the Inspector's letter stated that *'whatever I do, or do not do, new homes on the allocated market housing sites will be built and the housing land that the Council proposes as being necessary for the settled community will largely be provided'*.

2.4. Following confirmation from the Inspector that the LDP examination could not continue while the Council seeks to address concerns regarding LDP Policy H6, the Council requested the Secretary of State for Communities and Local Government (SoS) to call-in the Plan on the grounds that the Inspector's Interim Findings represented a disproportionate response in terms of the Inspector's interpretation of national guidance. The Secretary of State formally decided to call-in the Maldon District LDP under Section 21 of the Planning and Compulsory Purchase Act 2004 *'to test whether the planning inspector has taken a proportionate and balanced view on the local plan as a whole in the light of national planning policy'* (see Appendix 3).

2.5. On the 6<sup>th</sup> March 2016, the Council received a letter from the Secretary of State (see Appendix 4) confirming that Policy H6 is unsound but *'it was not proportionate for the Inspector to find the whole plan unsound because he had not examined the whole plan'* and *"having carefully considered the inspector's reasoning I disagree with his conclusion that Maldon District Council should not be given the opportunity to try to remedy the problems identified with Policy H6"* by continuing the examination of the Local Plan.

2.6. In relation to the objectively assessed need for housing set out in the submitted LDP, the Secretary of State's 6<sup>th</sup> March letter recognised that the

Council has carried out a comprehensive assessment of housing need and that there is nothing before him to lead him to a contrary view at this stage:

*“The inspector raised nothing in his interim findings to suggest that the Council has not undertaken a comprehensive and objective assessment of the need for housing for the settled community in Maldon; there is nothing before me at this stage in the process to lead me to take a contrary view. I note that the Council's intention is that the plan as submitted should be modified (Supplementary Statement [EB098c]) and has put forward revisions.”*

2.7. This clarification supports the Council in providing significant weight to policies within the LDP, and supports the housing target used within the identification of the Council's five year housing land supply.

2.8. The Secretary of State has therefore determined that the examination of the LDP should now resume. As the previous Inspector has retired, Simon Berkeley has been appointed to examine the Plan. In his letter dated 7 April 2016 (see Appendix 5), the new Inspector has identified a number of issues where further information or clarification is required before examination hearings can continue, relating to the provision for Travellers, the housing market area, highways and schools capacity, reserve sites, affordable housing provision, details on allocations, employment and retail evidence. The Inspector did not request any further information to be provided on housing need and the objectively assessed need for housing as set out in the submitted LDP. The Council submitted the additional information requested to the Inspector by July 2016.

2.9. In a letter dated 14<sup>th</sup> July 2016 (see Appendix 6) the Inspector requested that the Council undertake the following tasks prior to the continuation of the examination hearings proposed to begin on 8<sup>th</sup> November 2016:

- a) Prepare a paper comparing the 2014-based household projections with the basis for the objectively assessed need for housing (OAN).

- b) Undertake a sustainability appraisal (SA) of Reserve Sites; alternative sites; and the main modifications put forward by the Council thus far.
- c) In the light of the SA work, re-consider the main modifications proposed (to ensure that main modifications are informed by SA) and produce a brief paper explaining this.
- d) Publish the main modifications proposed by the Council for general public consultation (rather than a focussed consultation) and simultaneously publish all of the new SA work and the paper about the 2014-based household projections for information and comment.

2.10. The Council has completed tasks a-c listed above, and is currently consulting on the proposed main modifications to the submitted LDP. The paper considering the implications of the 2014-based household projections is provided in Appendix 7. This paper concludes that using updated data including the 2014-based household projections reduces projected housing need in the District. The new scenarios modelled in Appendix 7 suggest an OAN for the LDP period of 2014-2029 in the range of 252-275 dwellings a year, identifying an OAN target for the District of 260 dwellings per annum. Although the submitted LDP OAN target of 310 dwellings per annum is significantly higher, Appendix 7 recommends maintaining this target to allow for margins of error and the potential impact of increased migration out of London to surrounding areas.

2.11. The Council has proposed modifications to the submitted LDP following submission in April 2014, which are currently being consulted upon as requested by the LDP Inspector. The modifications predominantly relate to recommendations by the previous LDP Inspector prior to and during the examination hearings in January 2015. The list of modifications is provided in Appendix 8.

### 3.0 Five Year Housing Land Supply

- 3.1. The NPPF requires local planning authorities to identify an annual supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing target (NPPF, para. 47). In the absence of an up to date local plan, the local planning authority must firstly identify its full objectively assessed need for housing, and secondly identify deliverable housing sites to fulfil such a requirement.
- 3.2. National Planning Practice Guidance (PPG) provides further details on the approach and scope of assessments that should be undertaken by local planning authorities to assess the OAN. The guidance indicates that an OAN based on household projections may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence.
- 3.3. The Planning Advisory Service's Technical Advice Note, 'Objectively Assessed Need and Housing Targets: Second Edition' (PAS and Peter Brett Associates, July 2015), is also a useful source of information, although it has no official status. This note brings together relevant best practice and experience from Local Plan examinations across England and Wales.

#### *Objectively Assessed Need (OAN)*

- 3.4. Local authorities should use their evidence base to ensure that their Local Plan meets the full OAN for market and affordable housing in the housing market area (HMA) (NPPF para 47). Paragraph 159 of the NPPF states that local planning authorities should have a clear understanding of housing needs in their area, and that a Strategic Housing Market Availability Assessment (SHMA) should identify the scale and mix of housing and the range of tenures that the local population is likely to need. The PPG at 2a-006 states that there is no one methodological approach or a particular dataset(s) which should be used to identify OAN, but the 'standard methodology' is strongly recommended.

3.5. The Council's SHMA was published in September 2014 (see Appendix 9). This SHMA was jointly commissioned between the neighbouring authorities of Maldon, Braintree, Brentwood, Chelmsford and Colchester. It has been accepted by neighbouring authorities in accordance with the Duty-to-Cooperate and has been tested at Examination-in-Public. The SHMA is part of the LDP evidence base but it pre-dates the PPG, it therefore does not follow the 'standard methodology' recommended. Although it suggests an annual housing requirement of 319 homes (189 for market housing and 130 for affordable housing) over a 15 year period, it does not reach any conclusions on the District's full OAN. The SHMA uses a mix of primary survey data and secondary data to assess housing need following the 2007 CLG Practice Guidance, as stated in Paragraph 4.11.5 of the September 2014 SHMA (Appendix 9):

*"The stock flow analysis (on which the September 2014 SHMA is based) is not however intended as an alternative basis to the demographic projections as the base from which to determine the OAN figure."*

3.6. The SHMA is an important part of the LDP evidence base in relation to considering the housing needs of the District. However demographic experts Neil McDonald Strategic Solutions Ltd (NMSS) advised the Council that the SHMA should not on its own identify the District's OAN, but should instead form part of suite of evidence base documents which assists in identifying the District's OAN. This advice was echoed in Supplementary Statement EB010g (see Appendix 10) produced by DCA (the Council's consultants that produced the SHMA) alongside the September 2014 SHMA which stated that:

*'The SHMA shouldn't be seen as an alternative basis to the population projection from which to determine the Objectively Assessed Need for the number of homes that may be needed. By analysing the current profile of the local housing stock and its flow (turnover) the SHMA does provide an invaluable insight into the type of homes that are needed and information about the local housing market. The SHMA will help to inform the Council's Objectively Assessed Need for housing'.*

3.7. LDP evidence base document EB098c 'Identification of Objectively Assessed Needs for Housing (OAN) Supplementary Statement to Assessing Maldon's Housing Requirements' (see Appendix 11) states that the SHMA (September 2014, see Appendix 9) should not be used solely to identify the OAN for the following reasons:

- The stock flow analysis utilised in the SHMA is not intended as an alternative basis to the demographic projections as the base from which to determine the OAN figure (see section 4.11 of EB010f and paragraph 123 of EB098a);
- The independent audit of OAN has recommended that the OAN should be based upon the latest official projections for the area with adjustments for factors which appear to be departures from the longer term trend (in accordance with the National Planning Practice Guidance). These suggest a requirement of 280 to 310 homes a year over the plan period. By accepting that the OAN figure is likely to be represented by the highest figure within the range presented, the Council is also ensuring the potential for future outward pressure from London, and also ensuring a sufficient buffer for any other anticipated factors which may lead to small adjustments (either upwards or downwards);
- The SHMA's stock flow based analysis is based on a survey of households in the area conducted in June and July 2013. Such surveys can only provide information on what respondents intend to do. As a result there are greater uncertainties in the estimates of the number of flows when compared with the official household projections (ref. EB098a); and
- The SHMA identifies affordable housing need utilising the DCLG model which is a well-established approach in accordance with national policy and guidance. However, the model only takes into account the current committed supply of affordable units in the District (delivery in the pipeline) which equates to 28 dwellings in the District. However, through the LDP the Council is planning to significantly increase the supply of

affordable units within the next five years, which in turn would reduce the longer term affordable housing requirements identified by the SHMA.

3.8. To assist the Council in identifying the District's objectively assessed needs for housing (OAN) in addition to the information contained within the SHMA, 'Assessing Maldon's Housing Requirement' (EB098a, see Appendix 12) was produced by NMSS in August 2014. This report recommended that the District's OAN for housing should be between 280 and 310 per annum, and concluded that *'it would be prudent to set the OAN for housing at the top of this range bearing in mind the likelihood of increased out migration from London'*.

3.9. As explained above, the LDP Inspector recently requested (see Appendix 6) a paper considering the implications of the 2014-based household projections (see Appendix 7). NMSS was commissioned to produce the paper as an update to the two previous OAN studies used to inform the production of the LDP (provided in Appendix 11 and 12). This update concluded that the most up to date data suggests an OAN for the LDP period of 2014-2029 in the range of 252-275 dwellings a year. Rounding to the nearest 10 homes a year, the report concludes that the District's OAN target is 260 dwellings per annum. Although the submitted LDP OAN target of 310 dwellings per annum is significantly higher, the report recommends maintaining this target to allow for margins of error and the potential impact of increased migration out of London to surrounding areas.

3.10. The LDP evidence base relating to the identification of the District's OAN (provided in Appendix 7, 9, 10, 11 and 12) as a whole suggests that the District's OAN is 310 dwellings per annum, as outlined in LDP Policy S2 (as amended, see Appendix 8).

3.11. In accordance with the 'standard methodology' in the PPG, this advisory note will explain the derivation of the OAN by defining the HMA and then dealing with (a) demographically generated need – births, deaths and

migration; (b) market signals; (c) employment evidence; and (d) affordable housing need.

### *Defining the housing market Area*

- 3.12. On page 35 of the Council's September 2014 SHMA (Appendix 9), following an analysis of ONS migration data it is indicated that the District is 63% self-contained in terms of household migration. Although this is lower than the benchmark recommended by CLG as 'typically 70%', it is sufficiently close to 70% to be regarded as a sensible area to plan for housing.
- 3.13. Page 33 shows travel to work evidence which suggests that around 51% of residents in Maldon District also working in the District and Commuter flows show a high level of out migration in general with strong relationship with Chelmsford, Colchester and Braintree, but also with Basildon and London – 11% of employed people commute to London. By combining information from travel to work patterns to the migration data, the evidence shows that there is no clear cut or self-evident alternative HMA which makes as much sense as self-containment. The Council was requested to consider this issue further by the previous LDP Inspector following the EiP hearings in January 2015. Appendix 13 presents the comments provided by the Council on the HMA to the LDP Inspector. The current LDP Inspector has also asked the Council if there is a need to re-consider the District's HMA through an early review of the Plan. The Council responded (see Appendix 14) to advise that Maldon District should be considered as a single HMA, and therefore no review is required.
- 3.14. The District's main road and rail links are with Basildon, Braintree, Chelmsford, Colchester and London. The functional economic market area (FEMA) is discussed in detail at paragraph 3.1 in the Employment Evidence and Policy Update (page 5, Appendix 15). This report concludes that Maldon has a strong relationship with Chelmsford but less strong relationships with other Districts and London which are in the periphery.

3.15. Maldon District is a good approximation for a housing market to plan for, migration or house moves show a reasonable level of containment and travel to work areas data suggests that there are no obvious alternatives. Other factors such as local geography and population density are good examples of how different the District is to its neighbours.

a) *Demographically Generated Need - The Starting Point*

3.16. The starting point for calculating the OAN is to use the latest household projections published by DCLG as defined in Planning Policy Guidance (2a-016). The latest available household projections were published by DCLG in July 2016, known as DCLG 2014. Appendix 7 considers the implications of the updated household projections for the District's OAN, and outlines that the DCLG 2014 projections suggest a housing requirement of 220 dwellings per annum during the LDP period up to 2029. With further technical adjustments outlined in paragraph 7 of Appendix 7, this would present an OAN for the District of between 250-260 dwellings per annum.

3.17. In the PPG (2a-015) it is made clear that the trend-based demographic projections used as the starting point may need adjustment to reflect factors affecting local demography and household formation rates. Trends in household formation rates may have been suppressed by historic undersupply of housing and worsening affordability during the recession – and these factors could be projected forward. The possibility of recessionary underestimation affects DCLG-2011, DCLG-2012, ONS-2010 and ONS-2012.

3.18. An independent and objective assessment for Maldon's Housing requirements is set out in the Assessing Maldon's Housing Requirement Report (AMHRR, see Appendix 12) and subsequent updates (see Appendix 7) which examine the various recent official projections, including the starting point for the OAN, an updated blend of DCLG-2014 and ONS SNPP-2014.

3.19. The purpose of the AMHRR and subsequent updates is to assess all available evidence and identify the District's OAN for housing. The AMHRR

and subsequent updates therefore provides further detail in addition to the SHMA, to present demographically based population projections which address in detail recessionary trends, and investigates the components of change, births, deaths and migration, and investigates the headship rates of different sections of the community to find the factors affecting local demography and household formation rates.

b) *Market Signals*

4.24. The PPG suggests that the OAN starting point should be adjusted to reflect market signals, as well as other market indicators of the balance between the demand and supply of dwellings. Prices or rents rising faster than the national/local average could indicate undersupply (2a-020). Market signals are considered in the supplementary statement to the AMHRR (page 13, Appendix 11) and in Annex B of EWT-M02b-01 (see Appendix 16). In accordance with the PPG, Land Prices, House Prices, Rents, Affordability and Rate of Development were all taken into account, as summarised below.

i. Land values

4.25. For land values, the Maldon Employment Evidence and Policy Update (page 33-35, Appendix 15) draws on Valuation Office Agency data which indicates that the District is cheaper than neighbouring areas, and there are no indications that land constraints have upward pressure on commercial rents. In addition, the Council has undertaken viability testing for the LDP and the findings do not indicate that land values poses a risk to the deliverability of the LDP or any of the strategic sites.

ii. Housing prices

4.26. The SHMA (September 2014) shows average house prices and amount of market activity, comparing the trends in neighbouring districts and the wider region, no significant deviation can be identified in Maldon compared to the Essex average (see page 70-72, Appendix 9). A comparison of average house

price trend from 1996 to 2012 has found that the District has followed the general trends of surrounding areas (Page 13, Appendix 11). The overall average house price for Maldon for Q1 2013 was £246,988, similar to the Essex County average of 240,846 and the Chelmsford average of £253,262. Figure 6-2 of the September 2014 SHMA (Appendix 9) shows the house prices by tenure for a group of Essex authorities and with the exception of detached properties, Maldon is cheaper than the Essex average. This difference in average prices of flats, terraces and semi-detached is assumed to attract in-migration from surrounding areas.

### iii. Rents

4.27. Market Rents are compared in paragraphs 5.8 - 5.10 of the AMHRR Supplementary Statement (page 14, Appendix 11). It demonstrates that lower quartile rent levels are well below the Local Housing Allowance and therefore rent levels are considered to be affordable. In addition rent levels are the lowest in comparison to all four neighbouring authorities.

### iv. Affordability

4.28. Affordability, as defined by DCLG, can be measured by the ratio between lower quartile house prices and lower quartile income, and by concealed households. Because market signals fluctuate from year to year, there is a danger that picking one particular period and comparing changes over that period might lead to very different results if you picked a different period, therefore it is important to take a long-term view. NMSS has recommended taking a broader view, and looking at the changes on a data graph, instead of focussing in on certain periods of the economic cycle. A graph on page 2 of Annex B of EWT-M02b-01 (Appendix 16) illustrates the long term ratio using DCLG data and it can be observed that all areas in Essex has experienced a worsening of the price/income ratio between 1999 and 2005 but this ratio has stabilised since the mid-00s. Maldon District has the same ratio of lower quartile house prices and lower quartile income as the Essex average, which is currently between 6-8 times. It's worth noting here that high affordability ratios

are not necessarily an indicator of market stress. Maldon District has a relatively high proportion of out-commuting meaning that such people bring back higher purchasing power and as a rural District, Maldon has a greater proportion of larger, more expensive homes and less 1-2 bedroom housing stock that are commonly in city centres. Both can have perverse effects on the affordability ratio.

v. Rate of development

4.29. The rate of development market signal means looking at past delivery and making a judgement on whether actual housing supply has consistently fallen below planned supply. As detailed later in this advisory note, Maldon has over-delivered against its requirements over the last plan period and therefore there is no evidence that the rate of delivery has suppressed need.

4.30. Finally, table 8-10 of the September 2014 SHMA (page 107, Appendix 9) suggests that over-occupation and over-crowding is low compared to the UK average, with only 1.7% of households affected across all tenures. Homelessness acceptances are 0.10 per 1,000 which is half the rate received compared to national and regional averages which are consistently above 0.20.

4.31. Taking the market signals as a whole, the indicators above show that Maldon is either consistent with or cheaper than the Essex average. Some local factors such as geography, accessibility and housing stock could be responsible for some deviations from the general market signal such as a higher proportion of larger homes meaning that average house prices are disproportionately uplifted. However all minor issues could be addressed by adopting the recommendations of the September 2014 SHMA. Overall, there are no Market Signals indicators suggesting that there is a need to boost supply above the recommended rate of 310 dwellings per annum due to adverse demand.

c) *Impact of Employment Need*

4.32. The basic question for employment signals is whether there will be enough people to support the jobs the economic projections say there are going to be, without significant changes to commuting patterns. If that were not the case, the PPG states that projections should be adjusted upwards.

4.33. A complete analysis of the East of England Forecasting Model (EEFM) 2014 is available in Appendix 3 of Maldon's Employment Evidence and Policy Update (Appendix 15) undertaken by Hardisty Jones Associates in July 2015. This analysis includes baseline sectoral projections and competition for employment growth with neighbouring Districts (paras 5.1.1 – 5.5.2). It concludes that:

*“Employment growth of 2,200 over the Local Plan period 2014 to 2029 from a base of 26,200 (+9%) is reasonable given the drivers of and constraints to future growth, and the role of Maldon District in the functional economic market area.”*

4.34. Appendix 3 also states that the EEFM is a consistent basis for forecasting economic growth for the entire East of England region and parts of the south-east and east-midlands region. For example, the Adopted East Cambridgeshire Local Plan uses the EEFM for its jobs output. The EEFM is also being used for employment trends in the joint OAN assessments of neighbouring local authority areas of Braintree, Chelmsford, Colchester and Tending.

4.35. NMSS has worked with Oxford Economics to input into the EEFM the population projections and projected age profile. In Annex A of EWT-M02b-01 (Appendix 16), NMSS analyses the employment signals for Maldon District and has concluded that the EEFM is a realistic model of jobs growth, predicting job growth of 7% faster compared to period between 2001-2011.

4.36. The EEFM output suggests that for the period between 2014 – 2029, 2,200 new jobs are expected to be created. This projection is by no means linear as

post-recession recovery is likely to level off towards a longer-term average level of growth and higher productivity means that the economy can grow faster but without the equivalent number of jobs emerging, however it is roughly equivalent to 134 jobs per year. This is roughly a linear extrapolation of the historic 15-year trend of 140 jobs per year over the period from 2000 to 2014. The EEFM output of 2,200 jobs can be compared to a projected population increase of 6,693 or 11% in the AMHRR (Para 46, Appendix 12) within the same period. Paragraph 4.7 of the supplementary statement to the AMHRR (Appendix 11) provides background data to the working age population and the economic activity rate. If the projected population were multiplied with today's economic activity rate (50.5%) (para 4.7, Appendix 11), this would equate to 3,380, and by factoring in commuting ratios (1.31) (see ONS 2011), double jobbing and increasing participation in the labour force of people aged 65+, there would be a total workforce of roughly 2,580. This is greater than the 2,200 jobs expected however small variations can be compensated for with small changes in the commuting ratios to/from neighbouring Districts.

4.37. Against a background of declining manufacturing being offset by increased employment within professional services, there is no primary evidence to suggest that there should be any significant structural changes in the economy that would lead to a departure from the historic trend. There is not, for example, any major employers expanding or a hub for a particular growth sector in Maldon. Opportunities for growth and constraints are discussed in detail in the Employment Evidence and Policy Updates (page 12-15, page 19-21, Appendix 15).

**Table 1: Employment growth forecasts and plans for delivery**

	EEFM 2014 Data			
	Current employment (2014)	Forecast future employment (2029)	Change in employment 2014-2029	Plans/assets to support change in employment
Chelmsford	99,500	114,100	14,700 (+15%)	<ul style="list-style-type: none"> <li>Plans for ARU Medical Technologies campus</li> </ul>
Braintree	63,200	72,000	8,800 (+14%)	<ul style="list-style-type: none"> <li>Aspiration for more than 14,000 new jobs</li> </ul>

				<ul style="list-style-type: none"> <li>• Use of existing undeveloped employment land allocations at Witham</li> <li>• Innovation park in urban extension to Braintree</li> <li>• Existing business incubator and plans for another</li> <li>• Phase 2 of Skyline 120 business park</li> <li>• Access to A12, A120, mainline rail and Stansted Airport</li> <li>• Keen to promote business and financial services</li> </ul>
Colchester	93,600	102,300	8,700 (+9%)	Three strategic employment zones
Brentwood	44,000	49,900	5,900 (+14%)	

4.38. It should be noted that there is strong competition for employment growth from neighbouring councils around the District, all of which have greater critical mass for employment and economic activity, and greater accessibility to the strategic road and rail networks (Maldon District does not have any dual carriageways and Maldon Town does not have a rail station, Burnham-on-Crouch has a single track branch line). For these reasons, Maldon District has 'difficulty attracting large employers' as they have generally favoured locating elsewhere in Essex where there is a larger and higher quality resident workforce and direct links to the strategic road/rail networks or airport links (paragraph 4.4.1, Appendix 15).

4.39. As verified by NMSS and Hardisty Jones Associates, the EEFM is a realistic or 'reasonable' estimate of future jobs growth for Maldon District. 2,200 net new jobs, compares well with the population projections used in the AMHRR and subsequent updates (Appendix 7, 11, 12 and 16).

4.40. The District's OAN of 310 dwellings per year or a total of 4,450 new dwellings represents sufficient growth in workforce to meet employment growth over the LDP period up to 2029.

**Table 2: Summary of Impact of employment need**

Total number of dwellings 2014/15-2029/30:	(Minimum of) 4,450
Population arising :	6,693
Estimated working age population:	3,380
Number of net new jobs (all sectors):	2,200

*d) Affordable Housing*

4.41. The executive summary of the September 2014 SHMA (page 6, Appendix 9) indicates two numbers for the affordable housing requirement, 154 dwellings per year of backlog is spread over the 15 year plan period and 201 if the backlog is dealt with over the first 5 years. This is useful for the purposes of the SHMA, but the Planning Advisory Service's Technical Advice Note on OAN and Housing Targets (July 2015) states that only net new need should be considered, this is relevant because if we look at the 154 requirement and take away the backlog (24), the net new need is 130.

4.42. The figures at table 14-11 of the September SHMA (page 172, Appendix 9) include existing backlog. The backlog equates to 24 homes per year if the backlog is cleared within 15 years, or 71 per year if cleared over 5 years. However as only newly arising need should be used to calculate affordable need, any backlog in table 14-11 has been deducted when calculating total requirements (i.e.  $201-71 = 130$  or  $154-24 = 130$ ). This confirms an affordable housing need requirement of 130 per year, or 1,950 over the period of the plan, not  $154 \times 15$  or  $201 \times 15$ .

4.43. An annual requirement of 130 homes is needed to meet Maldon's objectively assessed needs for affordable housing and the Council recognises that this converts into a challenging target of approximately 40% of market housing at 310 dwellings per year. Paragraph 14.11.10 of the SHMA confirms

that an overall housing target of 325 dwellings per year would be sufficient to address the full affordable requirement at 40% target levels.

4.44. Given that the housing supply is front-loaded with a significant supply of dwellings for the first five years according to the housing trajectory outlined below, it is likely that the Council will be able to deliver affordable housing significantly above the affordable need requirement for the first half of the plan period. This will significantly contribute towards meeting affordable need early on and, by freeing up existing stock and increasing churn, reduce overall need (see para 14.4.6, Appendix 9). The majority of supply for new affordable homes will be delivered on large strategic sites as part of section 106 agreements, but the Council also has a good track record of supporting innovative non-market schemes with its housing association partners for rural exception schemes and other affordable housing projects.

4.45. Although the calculation of affordable need is completely different, and overlaps with the calculation for the OAN, the Planning Advisory Service's Technical Advice Note on OAN and Housing Targets (July 2015) recommends comparing affordable need to affordable supply using a six-step approach (see para 9.2). Relating affordable need back to the OAN, the Council considers that the whole of affordable need (130dpa) can be met with potential affordable supply as set out in the submitted LDP, and therefore there is no need to raise the total need figure above 310 dwellings to deliver affordable housing requirements.

4.46. As requested by the LDP Inspector (Appendix 5), the Council has submitted a paper outlining its approach to delivering affordable housing requirements in the District up to 2029 (see Appendix 17). This paper concluded that through partnership working alongside the proposed delivery of affordable housing through the strategic sites allocated in the submitted LDP, it is projected that District could produce a small surplus of 215 affordable homes by 2029 (paragraph 16, Appendix 17).

### *Conclusions on OAN*

4.47. As outlined in AMHRR (Appendix 12), NMSS calculated the District's OAN by starting with SNPP-2012 plus DCLG-2011 headship rates as the demographic model. NMSS has considered recessionary trends and concluded that a part return to 2008 trend would be a more realistic approach. This gave a range of 280-310 as the OAN within the AMHRR and earlier updates (Appendix 11, 12, and 16). When taking into consideration the unlikely reoccurrence of UPC (an adjustment of attributable change - the discrepancy between the 2001 estimate of the population plus births, less deaths, plus net migration and the 2011 census population estimate) and likely pressure of out-migration from London, the Council considered it to be prudent to set the OAN at the upper end of this range. In accordance with PPG, Market Signals, Employment Signals and Affordable Housing were examined and no compelling evidence was found to justify increasing the OAN further.

4.48. A recent update to the AMHRR produced by NMSS (August 2016, Appendix 7), produced to take account of updated DCLG household projections, concluded that the updated projections result in an OAN for the LDP period of 2014-2029 in the range of 252-275 dwellings a year. Rounding to the nearest 10 homes a year, the report concludes that the District's OAN target is 260 dwellings per annum. Although the submitted LDP OAN target of 310 dwellings per annum is significantly higher, the report recommends maintaining this target to allow for margins of error and the potential impact of increased migration out of London to surrounding areas.

### *Calculating the Five-year housing land supply*

4.49. The following section provides a summary of the Council's five year housing land supply (FYHLS) position, the supply comprises of the sum of components: A. Commitments (split into large sites and small sites), B. Strategic Allocations and C. Windfalls. The following sections outline the five

year requirement based on an OAN as explained above, the supply of housing, and the final housing land supply calculation.

4.50. This advisory note is based on the latest Five Year Housing Land Supply Statement (FYHLS) published by the Council in August 2016 (see Appendix 18), and supersedes the previous version of the statement published in July 2015.

#### *Five Year Housing Requirement*

4.51. The starting point of calculating the District's five year housing requirement is the Council's identified OAN figure of 310 dwellings per annum between 2014 and 2029. As detailed above this figure is based on up-to-date evidence base documents which support the submitted LDP, in particular the August 2016 update to the AMHRR provided in Appendix 7, which continues to support the OAN figure for the District originally identified by NMSS in August 2014 (see Appendix 12). The identified OAN was discussed at the LDP examination hearings in January 2015, and the Council's justifications were detailed in the Hearing Statement (MDC LDP Hearing Statement, Matter 2, page 14, see Appendix 19).

4.52. The Council's five year housing requirement also needs to take into account a number of other considerations including the additional 5% buffer required by the NPPF to allow choice and competition. Paragraph 47 of the NPPF indicates that the Council should apply a 5% buffer to a locally identified housing target to ensure choice and competition (20% if there has been a persistent record of under delivery). Through the production of the LDP the historic housing delivery record has been assessed in detail. Since 1996, Maldon District has consistently met its housing requirements. During the Essex and Southend-on-Sea Structure Plan period of 1996 to 2011, the District was required to deliver 2,800 dwellings (annual average of 187 dwellings per annum). This figure was exceeded with 3,270 dwellings having been delivered between 1996 and 2011 at an annual average rate of 218 dwellings per annum. The East of England Plan, which replaced the Essex and Southend-on-Sea

Structure Plan, had a plan period of 2001 to 2021 requiring the delivery of 2,400 dwellings in total. Between 2001/2 and 2013/14 1,653 dwellings were completed in the District, 93 dwellings in excess of the East of England Plan requirement of 1,560 dwellings for this period (see table 1 of Appendix 18, and table 3 below).

**Table 3: Maldon District record of housing delivery**

<b>Strategic Policy</b>	<b>Total Housing requirement in Plan period</b>	<b>Annual requirement</b>	<b>Housing delivered up to 2014</b>	<b>Required delivery up to 2014</b>	<b>Surplus / deficit</b>
The Essex and Southend on Sea Structure Plan 1996 – 2011 (adopted 2001)	2,800	186	3,270	n/a	+470
East of England Plan 2001-2021 (adopted 2008)	2,400	120	1,560	1,653	+93

4.53. The summary table above outlines that the Council can demonstrate a good record of historic delivery, with overall surpluses from the last plan period. Through the progress being made on strategic sites allocated in the LDP, the Council can show uplift in housing which is both deliverable and achievable (see later sections). Therefore it would be unreasonable to seek an additional 15% buffer under paragraph 47 where the Council has not persistently under delivered on previous housing targets.

4.54. The current five year housing requirement is summarised in the following table which is extracted from the latest Five Year Housing Land Supply Statement (Table 4, Appendix 18). The rolling five year requirement has taken into account the Council's OAN, and over/under supply since 2014, and the 5% buffer required by the NPPF.

**Table 4: Rolling five-year requirement**

Base 5 year requirement	(310 x 5) = 1,550
<b>Reporting Year Shortfall/Surplus</b>	
LDP requirement in reporting year (since 2014)	4.020
Net provision delivered in LDP period to date (2014-29)	317
Over/under supply in reporting year	= -303
<b>Rolling five-year housing requirement</b>	
Five year requirement	1,550
+/- Over/under supply in plan period	+303
+ 5% NPPF buffer	+93
<b>Total</b>	<b>1,946</b>

4.55. In term of housing supply, the District's housing supply consist of the following components:

- a) Commitments – deliverable sites with planning permission or a resolution to grant planning permission subject to completion of a S106 agreement;
- b) Windfall allowance identified in the LDP;
- c) Strategic allocations in the emerging LDP;
- d) Minus a reduction for potential slippage and non-implementation.

4.56. Strategic allocations identified in the emerging LDP have been included because of the advanced stage in the preparation of the LDP and the significant progress which has been made in bringing these sites forward for development.

*a) Commitments*

4.57. Most of the sites with extant planning permission or a resolution to grant planning permission subject to the completion of a S106 agreement are considered to be deliverable. This approach is in compliance with the relevant Planning Policy Guidance which states that '*Deliverable sites for housing could*

*include..... sites with planning permission..... unless there is clear evidence that schemes will not be implemented within five years.'* (Paragraph: 030 Reference ID: 3-030-20140306).

4.58. Through annual monitoring the Council has identified a small number of sites where the scheme is not considered deliverable within the next five years (see Appendix C of Appendix 18). These sites are therefore excluded from the Council's five year housing land supply.

4.59. The housing supply within the FYHLS calculation includes 1,929 dwellings which have planning permission or a resolution to grant planning permission subject to completion of a S106 agreement. This includes:

- 286 dwellings on deliverable small sites with capacity of less than five dwellings (see Appendix D of Appendix 18)
- 95 dwellings on deliverable sites with a capacity of 5 to 9 dwellings (see Appendix E of Appendix 18); and
- 1,548 dwellings on deliverable sites with a capacity of 10 dwellings or more (see Appendix f of Appendix 18).

*b) Windfall allowance*

4.60. Paragraph 48 of the NPPF indicates that:

*'Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.'*

4.61. As part of the Local Development Plan examination the Council has undertaken detailed analysis on the District's windfall delivery (see Appendix

20 and 21). Windfall development has contributed consistently and significantly towards the District's historic housing delivery and there is no reason to suggest that this trend will not continue in the future.

4.62. The Strategic Housing Land Availability Assessment (SHLAA, see Appendix 22) demonstrates that there is a large amount of suitable sites and willing landowners to supply land for future windfall developments. The SHLAA has identified potential land for more than 20,000 dwellings (p26 of the SHLAA volume 1).

4.63. The amount of large, detached houses within the District is also a good indicator of a steady supply of windfall sites, through intensification for example. The identified market need for smaller dwellings is likely to sustain windfall delivery within the intensification/sub-division category. In addition Government policies on brownfield land are likely to result in a steady supply of windfall delivery from the industrial / commercial / vacant category, while the changes in GPDO may serve to increase windfall delivery under the Change of Use category. In conclusion, given the Council's historic trend it is reasonable for the Council to allow a conservative windfall allowance of 20 dwellings per annum.

*c) Strategic allocations*

4.64. Table 5 below provides an update on the progression of all strategic sites allocated in the submitted LDP, and the estimated delivery within the FYHLS. LDP Site S2h requires the relocation of a football club before development can commence, therefore despite planning applications for the development of the site and relocation of the football club currently being considered by the Council, no delivery has been assumed within the next five years. With the exception of Site S2h, all other the strategic allocations in the submitted LDP are suitable, available and achievable, and therefore should be included in the Council's five year housing land supply.

4.65. Of the eleven strategic sites allocated in the LDP, seven sites have received planning permission or a resolution to grant permission subject to the completion of a section 106 agreement, including one site which has started development. Of the remaining four sites, three have planning applications currently being determined by the Council.

**Table 5: Update on site allocated in the LDP, and estimated delivery within the next five years**

LDP ref	Source of Supply	Site Area (ha)	Work In Progress	Net Capacity	Deliverable	Suitability comment	Availability comment	Achievability comment	Monitoring Year	2016/17	2017/18	2018/19	2019/20	2020/21	Net 5-Year Land Supply
S2(a)	South of Maldon (South of Limebrook Way)	84	Outline Permission granted subject to s.106	1000	Y	Yes	Yes	S106 agreement currently being finalised.	0	0	25	40	85	85	235
S2(b)	South of Maldon (Wycke Hill North)	20	Application received and pending consideration	350	Y	Yes	Yes	Outline application submitted December 2015.	0	0	0	50	50	50	150
S2(c)	South of Maldon (Wycke Hill South)	6	Outline Permission granted	117*	Y	Yes	Yes	Outline permission granted. Reserved matters application refused on design grounds.	0	0	0	39	39	39	117
S2(d)	North of Heybridge	102	Application received and pending consideration	1035	Y	Yes	Yes	Determination of application expected late 2016. Site is subject to a Planning Performance Agreement.	0	0	0	62	88	88	238
S2(e)	Land to the North of Holloway Road, Heybridge	4	Outline Permission granted subject to S106.	100	Y	Yes	Yes	S106 agreement currently being completed.	0	0	0	34	33	33	100
S2(f)	West of Broad Street Green Road, Heybridge	6	Full Permission granted subject to S106.	145*	Y	Yes	Yes	S106 agreement currently being completed.	0	0	50	50	45	0	145
S2(g)	South of Maldon (Park Drive)	5	Full Permission granted. Under construction, Phase 1 part complete.	131*	Y	Yes	Yes	Estimated completion by 2017/18	24	67	40	0	0	0	107
S2(h)	Heybridge Swifts	3	Application received and pending consideration	100	N	Yes	No	Site is not currently available.	0	0	0	0	0	0	0
S2(i)	West of Burnham-on-Crouch	6	Hybrid application approved subject to S106	180	Y	Yes	Yes	180 dwellings included in the detailed element of the scheme. S106 agreement currently being completed.	0	0	30	40	40	40	150
S2(j)	North of Burnham-on-Crouch (West)	15	Full Permission granted subject to S106.	180	Y	Yes	Yes	S106 agreement currently being completed.	0	0	50	50	50	30	180
S2(k)	North of Burnham-on-Crouch (East)	8	No application submitted.	90	Y	Yes	Yes	Application expected in 2017.	0	0	0	0	30	30	60
Total of all strategic allocations				3,428					24	67	195	365	460	395	1482

\*\*Table updated 25/08/16

\* Figures and phasing have been updated to reflect the maximum numbers of dwellings allowed in planning permission

4.65 Footnote 11 of the National Planning Policy Framework (NPPF) sets out the definition of 'deliverable sites' and indicates that:

*'To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.'*

4.66 Furthermore, the Planning Policy Guidance states that:

*'...planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out.'* (Paragraph: 031 Reference ID: 3-031-20140306)

4.67 It is therefore clear that both the NPPF and the PPG allow allocated sites without extant planning permission to be included as part of a five year housing land supply, as long as there is robust and up-to-date evidence to demonstrate that the sites in question are available, suitable, achievable and viable.

#### *Availability, suitability, and achievability of LDP strategic allocations*

4.68. All of the strategic allocations are available. The willingness of all the associated landowners and developers is demonstrated through the submission of planning applications for ten of the eleven LDP strategic allocations. All sites are documented in the Strategic Housing Land Availability Assessment (see Appendix 22) and the respective Statements of Common Ground agreed between the Council and relevant developers and land promoters during the LDP Examination (see Appendix 23, 24, and 25). The Statements of Common Ground relate to all LDP strategic allocations in Maldon, Heybridge, and Burnham on Crouch.

- 4.69 To support the progression of planning applications and the delivery of sites in the North Heybridge and South Maldon Garden Suburbs, Strategic Masterplan Frameworks were jointly produced by Maldon District Council, relevant developers and land promoters, and Essex County Council. The joint production of these documents clearly demonstrates the availability and achievability of the sites for development, and has assisted in speeding up the production and determination of planning applications within the Garden Suburbs (see Appendix 26 and 27).
- 4.70 The suitability of the strategic allocations has been assessed in great detail throughout the preparation of the submitted LDP. The strategic growth strategy set out in Policy S2 of the submitted LDP was not subject to objections by any statutory consultees such as the NHS, the education authority, highways authority, the local Lead Flood Authority, the Environment Agency, Natural England and English Heritage (now Historic England).
- 4.71 Funding has been secured by the Council and Essex County Council to support the delivery of the North Heybridge and South Maldon Garden Suburbs. This includes funding from the South East Local Economic Partnership (SELEP) towards highways improvements and HCA Growth Capacity Funding towards the delivery of the Garden Suburbs. The Council is also working with the Environment Agency to obtain Grant in Aid funding towards the North Heybridge Strategic Flood Alleviation Scheme.
- 4.72 As a result of the Council's collaborative and proactive approach to progressing the LDP strategic allocations, planning applications have been submitted on ten of the eleven sites allocated in the Plan. Given the reasons stated above, it is appropriate to include the LDP strategic allocations into the Council's five year housing land supply.

*Proposed rates of delivery*

4.73 The proposed rates of delivery for the LDP strategic allocations (set in table 5 above and Appendix 18) and other large scale sites with planning permission or a resolution to grant permission subject to completion of a S106 agreement (see Appendix F of Appendix 18) are considered to be conservative given proposed delivery rates for other similar developments in the area. For example, the Chelmsford City Council Housing Land Supply Statement (April 2015, see Appendix 28) recommends the following delivery rates for the development of Greater Beaulieu Park:

**Table 6: Greater Beaulieu Park delivery rates**

Year 1	Year 2	Year 3	Year 4	Year 5
115	293	240	259	297

4.75 The Greater Beaulieu Park development is a large scale urban extension of 3,600 dwellings, which includes significant infrastructure projects alongside housing. Rates of delivery proposed for this development are significantly in excess of those proposed by Maldon District Council for the LDP strategic sites.

4.76 The Homes and Communities Agency (HCA) has produced advice in relation to the rate of housing delivery on strategic or large scale sites (see Appendix 29). This note states that *'it is impossible to provide a standard average rate, but evidence would suggest that forecast trajectories for the very largest sites (say 4,000 units +) may be in the range of 300-500 units pa, and for the smaller strategic sites could be more in the range of 150-300 units per annum'*. The rates of delivery proposed by Maldon District Council do not exceed 88 dwellings per annum on any strategic or large scale site. The rates of delivery are therefore considered to be highly conservative.

4.77 The rate of delivery estimated by Maldon District Council for a large scale strategic site such as LDP S2(a) and S2(d) is based on a minimum of a 15 month turnaround from the submission a reserved matters or full planning application to the delivery of dwellings onsite. This approach is based on the experience from

LDP allocated site S2(g), Park Drive Maldon, which is the first site allocated in the LDP to begin development. Site S2(g) progressed through the process from full planning application to delivery of dwellings on site within 15 months as outlined below.

- Detailed application validated - June 2014
- Approved by Council - October 2014
- Completion of S106 agreement - October 2014
- Development started on site - September 2015

*d) Potential slippage and non-implementation*

4.78 Based on historic monitoring data (see table 6, Appendix 18), the Council has applied a 5% deduction to the projected future housing delivery to account for potential slippage and non-implementation.

*Five year housing land supply calculation*

4.79 The Council's current five year supply position is summarised in the following tables taken from the FYHLS statement (see tables 9 and 10 in Appendix 18).

**Table 7: Total deliverable housing land supply 2015/16 - 2019/20**

<b>Source of Supply</b>	<b>Units</b>
Sites with planning permission or a resolution to grant planning permission subject to completion of a S106 agreement. Net five year land supply within the following appendices: Appendix D – 286 dwellings Appendix E – 95 dwellings Appendix F – 1,548 dwellings	1,929
Other strategic allocations identified in the LDP (see Table 8 and Appendix G)	448
Windfall Allowance	100
minus 5% slippage and non-implementation rate (* 95%)	-124
<b>Total supply</b>	<b>2,353</b>

**Table 8: Assessment of five year supply against five year housing requirement**

5 Five Year Supply	6 Units / Years
Total supply (from Table 9)	2,353
Rolling five year housing requirement (from Table 4)	1,946
Housing Supply in years	$(2,353 / 1,946 \times 5)$ <b>= 6.04 years</b>

## 5.0 Conclusion

- 5.1 This advisory note has explained and justified the Council's latest position on the five year housing land supply. This includes the consideration of the Council's current housing target as well as sources of housing land supply including strategic allocations in the submitted LDP.
- 5.2 The Council is able to demonstrate 6.04 years housing land supply against its identified housing target. This latest position on the Council's five year housing land supply should be treated as an important material consideration.

## **6.0 APPENDICIES**

Appendix 1: Inspector's Interim findings on the soundness and legal compliance of the housing and infrastructure policies of the LDP. 8<sup>th</sup> May 2015, reference IED16

Appendix 2: LDP Inspector's letter dated 3<sup>rd</sup> June 2015, reference IED17

Appendix 3: Secretary of States letter confirming that the LDP has been called in under Section 21 of the Planning and Compulsory Purchase Act 2004

Appendix 4: 6<sup>th</sup> March 2016 letter from the Secretary of State confirming the continuation of the LDP EiP

Appendix 5: 7 April 2016 letter from the LDP Inspector requesting further information

Appendix 6: 14<sup>th</sup> July 2016 letter from the LDP Inspector requesting the Council undertake further tasks prior to the continuation of the examination

Appendix 7: Implications of the DCLG 2014-based housing projections for the objectively assessed housing needs of Maldon District

Appendix 8: Proposed main and additional modifications to the submitted LDP

Appendix 9: Strategic Housing Market Assessment, Final Report, reference EB0010f (September 2014)

Appendix 10: Strategic Housing Market Assessment (SHMA) September 2014 Explanatory Note, reference EB010g

Appendix 11: Identification of Objectively Assessed Needs for Housing Supplementary Statement to Assessing Maldon's Housing Requirements, NMSS, September 2014, reference EB098c

Appendix 12: Assessing Maldon's Housing Requirement NMSS, August 2014, reference EB098a

Appendix 13: Maldon District Council's comments on Chelmsford City Council's response to the Barton Willmore SHMA, reference EWT-M02-02

Appendix 14: Inspectors Matters (April 2016), The Housing Market Area, MDC, April 2016

Appendix 15: Maldon District Employment Evidence and Policy Update, Hardisty Jones Associates, July 2015

Appendix 16: Implications of DCLG's 2012-based Household Projections, post examination note to the previous LDP Inspector, MDC / NMSS, February 2015

Appendix 17: Inspectors Matters (April 2016), Affordable Housing, MDC, April 2016

Appendix 18: Five Year Housing Land Supply Statement, MDC, August 2016

Appendix 19: LDP Hearing Statement, Matter 2, page 14, MDC, January 2015

Appendix 20: CED10 MDC Additional Housing Evidence Report 22 August 2014,  
para 31-34

Appendix 21: CED10 MDC Additional Housing Evidence Report 22 August 2014,  
Appendix 9 Assessment of Historic and Future Windfall Housing Delivery in the  
Maldon District

Appendix 22: MDC Strategic Housing Land Availability Assessment, Volume 1,  
June 2012

Appendix 23: South Maldon Garden Suburb Statement of Common Ground for LDP  
Examination, January 2014

Appendix 24: North Heybridge Garden Suburb Statement of Common Ground for  
LDP Examination, January 2014

Appendix 25: Burnham on Crouch Statement of Common Ground for LDP  
Examination, January 2014

Appendix 26: South Maldon Garden Suburb Strategic Masterplan Framework

Appendix 27: North Heybridge Garden Suburb Strategic Masterplan Framework

Appendix 28: Chelmsford City Council Housing Land Supply Statement, April 2016

Appendix 29: Homes and Communities Agency notes on build out rates from  
strategic sites, HCA, July 2013