

Proposed Main Modifications to the Pre-Submission Local Plan – October 2016

Representations on behalf of the Royal Horticultural Society (RHS)

The following representations have been prepared by Boyer on behalf of the Royal Horticultural Society in respect of the Proposed Main Modifications to the Maldon Pre-Submission Local Plan. To inform our responses, consideration has been given to the supporting documents as follows:

- Implications of the DCLG 2014-Based Household Projections for the Objectively Assessed Housing Needs of Maldon District; and
- Five Year Land Supply Statement 2015/16.

The changes proposed appear to be in line with those that had emerged through the Examination process and this is the first formal opportunity to comment on those changes.

Policy S2: Strategic Growth

Modification 098

The Implications of the DCLG 2014-Based Household Projections for the Objectively Assessed Housing Needs of Maldon District document concluded that the best current estimate of housing need is 260 homes a year for 2014-2029, which therefore does not suggest any fundamental change in the objectively assessed housing need for the District. However the report does conclude that increasing the housing requirement would provide headroom for potential increased migration out of London.

The first modification (Ref: 098) relates to Policy S2: Strategic Growth and reflects this increase. The housing numbers for the District are therefore increased to a minimum of 4,650 dwellings between 2014 and 2029, representing an average of 310 dwellings per annum.

The increase in the level of growth being planned is welcomed and as such it is felt the Council are better able to demonstrate that they are endeavouring to meet the District's objectively assessed housing need in respect of forecast projections. It is important to plan for any future population increases and adhere to the governments' requirement for an adequate supply of housing; therefore the allocations as they stand in the plan remain necessary.

Modification 043

The modifications confirm that the housing figure for Burnham on Crouch remains at 450, and is spread across the same three strategic allocation sites as were proposed within the Draft Local Plan. The retention of housing allocation S2 (k) North of Burnham on Crouch (East) for 90 dwellings is supported, not least, as this is the preferred site for development with the Neighbourhood Plan currently being prepared. The other allocations S2 (i) and S2 (j) have recently both received resolutions to grant subject to completion of section 106 agreements, and both relate to applications for the allocated number of 180 dwellings. We would like to confirm the scale of development envisaged within Policy S2 site S2 (k) would be capable of being delivered within the timescales identified, with the intention being to progress towards submission of an application for the site in the near future. It is important to ensure that the plan led system is not undermined by speculative applications coming forward.

Modification 088

Whilst the principle of Modification 088 is welcomed in seeking to provide clarification that any other speculative development in excess of the LDP requirements will not prejudice or delay the delivery of strategic allocations and they will be required to demonstrate sufficient infrastructure capacity to support the development, it is felt the amended wording requires further clarification. It could currently be interpreted as meaning that any development over 450 would need to demonstrate availability of infrastructure. This should be amended to read "Any proposal for development outside of the allocated sites will need to demonstrate to the Council's satisfaction that ..." It is the wording "in excess of the LDP requirements" that is of concern. It is a key point that allocated sites should not be prejudiced just because other development sites have come forward in advance of them, through speculative applications.

Modification 078(a)

We note the removal of the reserve sites from the plan including site RE3 East of Burnham on Crouch for 100 dwellings (Ref: 078(a)). We are of the view that the reserve sites assisted in planning for the future growth of the District and could be released when needed, albeit requiring a review of the plan. However, in light of the increase in housing numbers proposed, removal of the reserve site designation would in theory allow the sites to be brought forward earlier than they would have been previously, obviously and crucially ensuring they do not prejudice any other sites already allocated, and can demonstrate availability of adequate infrastructure.

Land forming part of Site RE3 has recently (December 2015) been granted outline planning permission for 75 dwellings and open space at appeal. The Inspector gave great consideration to the deliverability of the allocated sites in the plan and issues of prematurity, in relation to limited infrastructure capacity and in the case of Burnham specifically, primary school capacity, concluding that concerns over prematurity did not arise in this case. The Inspector also considered the Council's five year land supply position, concluding although they were able to demonstrate a 5 year supply of housing land, the proposal aligned with the NPPFs objective of increasing housing supply including affordable housing in any event.

In terms of housing land supply, the Council's statement 2015/16 provides evidence that the Council is now able to demonstrate a supply of specific deliverable sites sufficient to provide 6.04 years' worth of housing against the Council's identified housing requirements. This level of supply suggests the Council are able to demonstrate sufficient immediate supply, however it is also necessary to demonstrate a rolling supply of housing for the lifetime of the plan. To this end it is considered that the residual element of RE3 would still potentially have a valuable role to play, particularly in the event of monitoring activities identifying shortfall in future supply and consideration should be given to its reinstatement as a reserve site or its future allocation through future Local Plan review.

Policy S6: Burnham on Crouch Strategic Growth

Modification 089 and Modification 014

Modification 089 relates to significant infrastructure constraints identified in the District and inserts new paragraphs to address matters raised during the EIP. The modification confirms that for Burnham the existing primary schools will be expanded in order to accommodate the projected needs of the 450 dwellings planned, while growth in excess of 450 would require the provision of additional primary school places that cannot be provided on the existing two primary school sites.

Modification 014 clarifies an issue in relation to early years and childcare and confirms that the planned development will generate an additional demand for a new 56 place facility to which the allocated sites would be required to contribute.

The clarification over the school and early years capacity issue is welcomed and again it is important to note that the allocated sites should be not be prejudiced by the advancement of other sites ahead of them.

Just because the dwelling target for Burnham of 450 has nearly been reached, this should not mean an allocated site should be restricted in relation to education capacity. A number of factors can affect the number of school places arising from a development, most notably the mix of dwellings. The site to the east of Burnham recently received outline permission and therefore the dwellings mix has not yet been finalised. This should therefore not prejudice site S2 (k) from coming forward on the same basis of providing financial contributions in respect of school places.

Modification 085

Modification 085 relates to Policy S6: Burnham on Crouch Strategic Growth and includes a number of additions and matters of clarification. Previous representations submitted on behalf of the RHS have commented on various aspects of this policy and we note the removal of point 2 with its requirement for enhanced public transport provision to be incorporated within the strategic allocations. Whilst this objective was clearly a positive aspiration, the wording was previously considered too rigid. The removal of this objective altogether is therefore supported as the relatively modest scale of each of the allocations is such that influence over those matters would have been limited in any event.

The amendment to point 6 of the policy to require 'community facilities', rather than community hubs and local centres is welcomed and provides a greater steer in terms of the intended approach for the sites. The amended wording allows flexibility on the sites and rather than insisting that all three sites provide both a community hub and local centre which, it was felt, would potentially undermine the vitality and viability of the town centre, allows one or other of an appropriate form and scale to be provided.

Boyer

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