



Our Ref: 1047

Your Ref:

Date: 27 October 2016

Mr Adrian Tofts  
Strategic Planning Manager  
Maldon District Council  
Princes Road  
Maldon  
Essex  
CM95DL

Dear Mr Tofts

## **Maldon District Council's LDP Consultation September 2016**

We write on behalf of Endurance Estates Strategic Land Ltd, in response to the current consultation on the District's Local Development Plan.

Endurance Estates welcome the opportunity to participate in this consultation process as they have an interest in a 3.2 hectare site located to the west of Maypole Road, Heybridge, within the proposed boundary of the North Heybridge Garden Suburb. An outline planning application for the construction of up to 45 dwellings and associated works on this site is currently being considered by the Council under your reference OUT/MAL/15/01152.

During the preparation of the LDP representations were made on this site by another developer with wider local land interests. That developer has since withdrawn their interest in the site. The landowner has appointed Endurance Estates to promote the site for a modest residential development. This unforeseen change in circumstances has however meant that neither the landowner, or Endurance Estates have been involved in discussions with the Council, or able to participate in the LDP consultations or the subsequent Hearings to date, in respect of the North Heybridge Garden Suburb proposals and in particular the use of land to the west of Maypole Road.

### **Objectively Assessed Housing Need**

In response to the Council's assessment of the implications of the DCLG 2014-Based Household Projections for Objectively Assessed Need (OAN) produced by NMSS, Endurance Estates have commissioned Bidwells to assess the Full OAN for housing in the District and we refer you to their enclosed report.

The assessment concludes that the FOAN is 5,520 dwellings between 2014 and 2029, equating to an average of 368 dwellings per annum. This comprises a demographic housing need of 295 dwellings per annum (dpa), additional employment need of 43dpa and additional need to address housing market signals and affordability of 30dpa, which equates to 368dpa. This is considerably in excess of the findings of the NMSS report and the proposed modifications to Policy S2 to increase the FOAN to a minimum of 4,650 dwellings (310 dpa).

### **Five Year Housing Land Supply**

Endurance Estates have also commissioned Bidwells to review the Council's Five Year Housing Land Supply Statement 2015/2016 and we refer you to their enclosed report.

The Bidwells report considers that there are a number of deficiencies in the way the Council's five-year housing land supply assessment has been undertaken. In particular:

- There are a number of recent appeal decisions identifying that the Council MDC does not have a supply of deliverable sites to meet the five-year housing land requirement;
- The Council have included the provision of windfall sites within their supply of deliverable sites without sufficient justification;
- The Council's supply relies on few, large, strategic sites, none of which are adopted. The majority of the strategic sites have also been demonstrated to have overly optimistic delivery trajectories given their current position in the planning process

Five scenarios have been considered in the Bidwells report, which reflect the current uncertainty as to what constitutes the FOAN for housing in the District. These found that there is between 3.9 and 5.5 years housing land supply.

Following a review of the scenarios, it was concluded that the annual requirement of 368dpa, based on Bidwells enclosed FOAN was the most robust. This results in a housing land supply of 3.7 to 3.9 years.

### **Proposed Main Modifications**

*Reference: 098 / 076*

*Policy/Para No: Policy S2 /2.24*

Whilst the Council proposes to increase the number of dwellings required over the plan period to 4,650 (310 dpa), it is considered that this increase is insufficient and should be a minimum of 5,520 dwellings between 2014 and 2029, equating to an average of 368 dwellings per annum as indicated in the enclosed Bidwells FOAN (October 2016).

*Reference: 108 /110*

*Policy/Para No: Policy S4 /2.60*

The removal of the requirement for a country park to the west of Maypole Road is supported.

*Reference: 109 /112*

*Policy/Para No: Policy S4 /2.62*

Our client's object to the area between the new relief road, Maypole Road and Langford Road being used exclusively as a green buffer.

Our client's site is located to the west of Maypole Road and has the potential to deliver benefits to the District and the community as part of a modest residential development, not least in terms of securing the comprehensive development of the Garden Suburb.

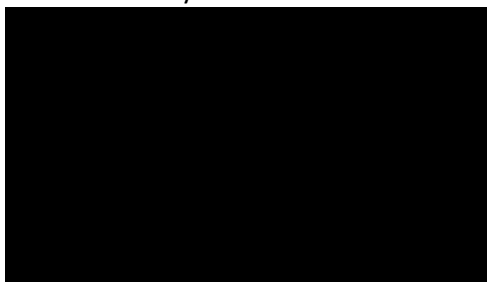
An outline planning application has been submitted for up to 45 dwellings and demonstrates that the site is suitable for this scale of housing which can be designed and delivered without prejudicing the design principles outlined in the Draft Strategic Masterplan Framework and other LDP policies. A development of the size proposed would complement and enhance the proposals for the North Heybridge Garden Suburb and providing much needed affordable housing.

The site is available and deliverable and the scale of the development is such that it could come forward within five years and ahead of some of the larger strategic sites thereby contributing to the Council's housing supply and the shortfall that has been identified. It is proposed that the development envelop would be approximately 40% of the site, focused to the east and closest to Maypole Road and the residential development proposed beyond. The remaining area to the west would comprise open space and there is scope for substantial landscaping. New footway links to Holloway Road will provide safe pedestrian and cycle access into the southern end of the site and opportunities exist to provide further links from the north east of the site into the residential development proposed east of Maypole Road and the wider area. All surface water run off would be managed on site by means of a sustainable urban drainage system that offers additional opportunities to promote and enhance wildlife and biodiversity.

The illustrative masterplan submitted with the application and hereby enclosed (Drawing no. 4750-103) demonstrates that a clear separation between Heybridge and Langford can still be achieved, with opportunities to address any impacts on the setting of the listed buildings. Accordingly main modification 112 should be deleted.

We trust that the above is self-explanatory however if you need to discuss this matter in any further detail at this point then please do not hesitate to contact me. We look forward to receiving confirmation that these representations have been received in due course.

Yours sincerely



Encl:

- i. Bidwells, Full Objectively Assessed Needs Maldon, October 2016
- ii. Bidwells, Five Year Housing Land Supply Maldon, October 2016
- iii. OUT/MAL/15/01152, Land West of Maypole Road, Heybridge, Illustrative Masterplan