



FE/110028  
October 2016

**Representations on behalf of Kensington and Edinburgh Estates (K&E) to:  
Proposed Main Modifications to the Maldon District Local Development Plan Consultation, in respect of:  
Policy S2 (Strategic Growth) RE1 West of Maldon (Maldon Hall Farm)**

Proposed modification 078(a) proposes the deletion of the West of Maldon (Maldon Hall Farm) site from Policy S2 of the Pre-Submission Local Development Plan (LDP).

K&E formally object to this proposed modification and request that the Maldon Hall Farm site is included within the settlement boundary of Maldon and allocated for residential-led development under Policy S2, as originally proposed.

The inclusion of this site as a strategic allocation is important to provide for further flexibility and contingency, and ensure the future delivery of the LDP growth strategy, including providing for the objectively assessed need for housing and to provide adequately for a five year supply of deliverable land for housing.

It is noted that the Council has commissioned and undertaken further assessment to identify local objectively assessed housing need in the District ('Assessing Maldon's Housing Requirement' NMSS, 2014), and based on these findings, the Council now intends to deliver a minimum of 4,650 dwellings (310 per annum) through the LDP, to fully meet the objectively assessed housing need identified.

However, given the Council's historic failure to deliver their annual housing targets, it is a real concern that the identified needs will continue not to be met. Although on performance against previous plan targets the Council does not have an historic record of under-performance, over the last 10 years that record can be called into question with failure to meet the annual target in six of the last 10 years. In these circumstances, an increased housing requirement through the LDP will prove extremely testing. Available data shows an emerging trend of adjusting the timing of supply from key sites to maintain a five-year supply. This is a symptom of poor forecasting of delivery rates for new housing.

K&E has taken advice from leading experts, Intelligent Land, with regard to the Council's stated five-year housing land supply. Intelligent Land maintain that the level of supply currently stated is over-optimistic and is dependent on the delivery of several large strategic sites that are unlikely to be completed within the necessary timeframes. In order to provide for further flexibility and contingency and ensure the future delivery of the LDP growth strategy, including providing adequately for a five-year supply of deliverable land for housing, further sites need to be allocated.

In view of the pressing need for new housing in Maldon, and the shortfall in the five-year housing land supply, it is considered that Maldon Hall Farm site should be re-allocated under Policy S2 for residential-led development.

The site is considered to be a sustainable location for residential development, as acknowledged by its inclusion as a reserve housing allocation site in the previous version of the LDP (2014). It is located immediately to the west of the A414 at the edge of Maldon's urban area, and has excellent potential for developing new connections with the adjacent existing communities and enhancing pedestrian cycle and bus links through and to the site.

It is considered that the development of the site can be achieved in a way that is sympathetically assimilated into the wider open countryside to the north west, whilst also ensuring connectivity and visual and functional integration with the build up areas of Maldon to the south and east of the site.

The site represents a unique opportunity for development. It is free from constraints, is available now and is deliverable in the short-term. It would make a valuable contribution to housing land supply and could also provide for the development of much-needed community facilities.

Furthermore, we are aware that the Council is considering options for the expansion of the Maldon Cemetery, adjoining the site on London Road, to meet the district's long-term burial needs. K&E is willing to work with the Council to facilitate this proposal and incorporate it in to the wider development of the Maldon Hall Farm site.

To conclude, we are confident that this site presents a significant opportunity to provide a high quality and sustainable development that will:

- Assist in meeting the overall housing requirement for Maldon;
- Meet the pressing open market and affordable housing needs of Maldon;
- Enable the delivery of new community facilities, including potential cemetery expansion;
- Create valuable employment through the construction phase.

We therefore request that this site is included within the settlement boundary for Maldon and allocated in the Maldon District Local Development Plan for residential-led development, under Policy S2.