

For Official Use Only

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Part 2 - Regulation 19 and 20 Town and Country Planning (Local Planning) (England) Regulations 2012 "Pre-Submission LDP" consultation

Please note that all comments on the Pre-Submission LDP consultation should be provided by completing Part 2 of this form. A separate completed Part 2 should be provided for each comment made within a representation.

2.1. To which part of the Maldon District Pre-Submission Local Development Plan (LDP) does this representation relate?

- | | | |
|---|--|----|
| a. Paragraph
(please specify paragraph number) _____ | b. Policy
(please specify policy reference) _____ | 13 |
| c. Proposals Map _____ | d. Other section
(please specify) _____ | |

2.2. Do you consider the Maldon District Pre-Submission LDP to be (tick as appropriate):

- a. Legally compliant** Yes
To be 'legally compliant' the LDP has to be prepared in accordance with the Duty to Co-operate and legal and procedural requirements. This is required by Government guidance No
- b. Sound** Yes
To be 'sound' a Local Plan should be positively prepared, justified, effective and consistent with national policy. This is required by Government guidance No
(if you **do not consider the LDP to be sound**, please complete section 2.3. below)

2.3. Do you consider the Maldon District LDP to be unsound because it is not (tick as appropriate):

- a. Positively prepared**
To be positively prepared the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements
- b. Justified**
To be justified the plan must be:
- Founded on a robust and credible evidence base;
 - The most appropriate strategy when considered against the reasonable alternatives.
- c. Effective**
To be effective the plan must be:
- Deliverable;
 - Flexible;
 - Able to be monitored.
- d. Consistent with National Policy**
The Plan must be consistent with Government guidance as set out within the National Planning Policy Framework

On the following pages, please explain why you think the Plan is unsound or not legally compliant, and set out any changes you feel should be made to the Plan to make the Plan sound or legally compliant.

Please note: As there will not normally be a subsequent opportunity to make further representations based on your representation at this stage, please include all the information, evidence and supporting information necessary to support/justify your representation and the suggested change(s) to the Plan. After this stage, further submissions will only be invited at the request of the Planning Inspector, based on the matters and issues the Inspector identifies for examination.

2.4. If you consider the Maldon District LDP to be unsound or not legally compliant please explain why in the box below.

Please be as precise as possible. Please also use this space for any comments in support of the LDP.

Objection is made to policy I3 due to the lack of recognition that part of Primrose Meadow (the area owned by Plume School) is currently used as a playing field for football training by Maldon & Tiptree Youth FC and has been used for formal community football for many years. The loss of a substantial part of the site to facilitate the potential expansion of the Plume School would therefore be objected to unless provision was made for retaining/enhancing the playing field for community use or replacing the playing field off-site. While reference is made to at least 1.3 hectares of the site being retained for amenity greenspace, this does not explicitly reflect the need to retain or replace the formal community sports use of the site. Unless this is recognized in the policy, there is a concern that the sports use will be lost or prejudiced when the site is developed due to the absence of policy guidance on this matter.

The potential loss of the formal sports use of part of Primrose Meadow would not be consistent with Government policy in the NPPF. Paragraph 74 of the NPPF makes it clear that existing playing fields should not be built unless the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Policy N3 of the local plan seeks to protect sports facilities in accordance with paragraph 74 of the NPPF. Policy I3 does not make explicit provision for maintaining the existing community sports use of the site as part of the development and therefore there is a genuine concern that the retained greenspace will not be suitable or sufficient for formal sport which would result in the proposals being contrary to the NPPF. The policy is therefore considered to be unsound in its current form due to the potential for a development informed by the current criteria in the policy not according with paragraph 74 of the NPPF.

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2.5. Please explain in the box below what change(s) you consider necessary to make the Maldon District LDP legally compliant and sound.

Please be as precise as possible. Please explain why this change will make the Maldon District LDP legally compliant and sound. It will be helpful if you are able to put forward any suggested revised wording of the policies or supporting text.

To address these concerns, it is requested that policy I3 and its supporting clarification makes it explicit that the area of the site that is used by the community as a formal playing field will need to be retained or replaced as part of any development and that detailed guidance on this will need to be included in the Planning Brief. This will be essential to provide an adequate policy framework to ensure that the proposals accord with paragraph 74 of the NPPF as well as policy N3 of the local development plan and Sport England's playing fields policy.

2.6. Do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination

2.7. If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.

This is the end of Part 2 (Regulation 19 and 20) of the response form. Please complete this form for each representation you wish to make. You only need to complete Part A once. Please submit all of your response forms together.

