

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) _____ | S2 |
| 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 (if you **do not consider the LDP to be sound**, please complete section 2.3 below) No

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.

This submission objects to policy S2, Strategic Growth as the suggested 4,410 additional housing target does not meet the 5 year housing supply that currently exists and it is contested that this figure is reviewed as it is not consistent with National policy. A far greater buffer should be adopted to redress the poor performance on housing delivery that the district has consistently suffered from. In addition, due to the districts constraints in respect to highways, sewerage, flood risk, school and health provision, it is appropriate to consider additional sustainable edge of settlement sites as potential housing development opportunities. With the constraints identified above and the concept of steering development away from areas of high quality landscape value, it would be appropriate for housing delivery to be allocated to a less constrained location such as Latchingdon that deserve further proportionate development/investment. This policy fails to address the district's key town and settlements potential to adapt and grow in order to deliver more homes, jobs and services to the local area. A clear set of guidelines needs to be identified, determining the appropriate scale of change for the principle towns/villages. This will ensure the existing character of rural villages through policy S2 is protected and that development takes account of environmental constraints. A more dispersed pattern of growth across the rural area to appropriate sustainable villages will also ensure existing residents can access a range of services and facilities with minimal travel, or the use of public transport.

We object to the LDP as it is considered the emerging plan does not properly respond and reflect the core planning principles of the NPPF in paragraph 17, bullet point 4 that requires planning policy to "take account of the different roles and characters of different areas..... supporting thriving rural communities within it." Furthermore, it is contested the emerging plan fails to properly respond to the objectives outlined in paragraphs 54 and 55 of the NPPF which state local Planning Authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exceptions sites where appropriate. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. We also contest that the plan fails to adequately identify appropriate rural village housing development sites thus also not being consistent with paragraphs 151 and 154 of the NPPF that confirm the need for local plans to contribute to the achievement of sustainable development setting out the opportunities for development and clear policies on what will or will not be committed. Paragraph 157 clearly states a local plan should "allocate sites to promote development and flexible use of land where necessary and provide detail on form, scale, access and quantum of development where appropriate."

The Maldon District Council (MDC) strategy is not sufficiently flexible in terms of the distribution of housing within the tiers of the settlement hierarchy, taking account of an appropriate sustainability appraisal and the long term health of rural villages. We propose that with regard to the spatial strategy and in order to properly conform with the NPPF, that settlements should be allocated to one of three categories: areas where strategic development should be concentrated in key district towns, areas of limited opportunities in larger villages such as Latchingdon and areas of restraint in smaller villages and hamlets that have limited facilities and access to public transport.

MDC have previously recognised that Latchingdon contains a good range of facilities and services with a variety of bus services connecting to a variety of nearby towns and settlements. It has also been accepted by MDC that Latchingdon is a village that is not constrained by flooding or other ecological/landscape designations. Furthermore, MDC have publicly acknowledged edge of

settlement development, beyond Latchingdon's settlement boundary can be considered as sustainable and accommodating new housing that will successfully contribute to the objectives and sustainable tests as identified in the NPPF.

These objections therefore contest that the LDP should place a greater emphasis on clearly identifying those rural villages that should accommodate new housing and key sites that can be delivered in order to give the plan certainty of housing delivery across the rural area. This submission proceeds to argue Latchingdon should be recognised as a rural settlement where it would be beneficial to encourage appropriate housing growth and that the subject site known as land to south of The Street, Latchingdon which forms a natural rounding off to the village settlement boundary is a deliverable site for much needed private, affordable housing and community facilities. Latchingdon already contains a range of community facilities and local services with a regular bus service as well as connections to the main local road network. The site is located within 10km of Maldon and Burnham on Crouch where there are a wide range of further facilities and services available.

Latchingdon certainly satisfies the NPPF's identification of three core principles associated with sustainable development relating to fulfilling an economic role, a social role and an environmental role. There is no doubt the village can accommodate additional housing and development of the subject site would make a significant contribution towards addressing a clear and pressing local housing need where MDC can only demonstrate just over a 1 year housing supply against the need of a 5 year housing supply and the 5-20% required buffer. In addition, it has been identified through a recent planning appeal that Maldon suffers an acute need for housing development, particularly for affordable housing units.

End.

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.

It is contested that the LDP:

- Places a disproportionate emphasis on delivering the districts required new housing from three strategic growth locations rather than adopting a more pragmatic approach regarding other settlements capable of accommodating new housing which will lead to a far more sustainable pattern of local development. Consequently, it is contested that in order to comply with NPPF core principles that policy S2 and its supporting text be amended to better reflect the views expressed in this and previous submissions on the emerging LDP.
- We suggest the proposals map should be altered to recognise there is a key development site to the south of The Street, Latchingdon. This site forms part of the principle road running through the village and would be an appropriate and ideal location for sustainable and proportionate residential growth, also providing additional community facilities. Such an allocation would be sustainable in terms of supporting development of the village as an inclusive community with new housing meeting a variety of local needs and providing an opportunity to cross subsidise the provision of additional local facilities. The identification of a deliverable site to an appropriate rural settlement brings certainty to the aspirations of the plan and will encourage the Parish to prepare a Neighbourhood Plan reflecting the requirements of the village for a range of needs including market and affordable housing. Such an approach would make the plan more in accord with paragraph 183 of the NPPF.

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

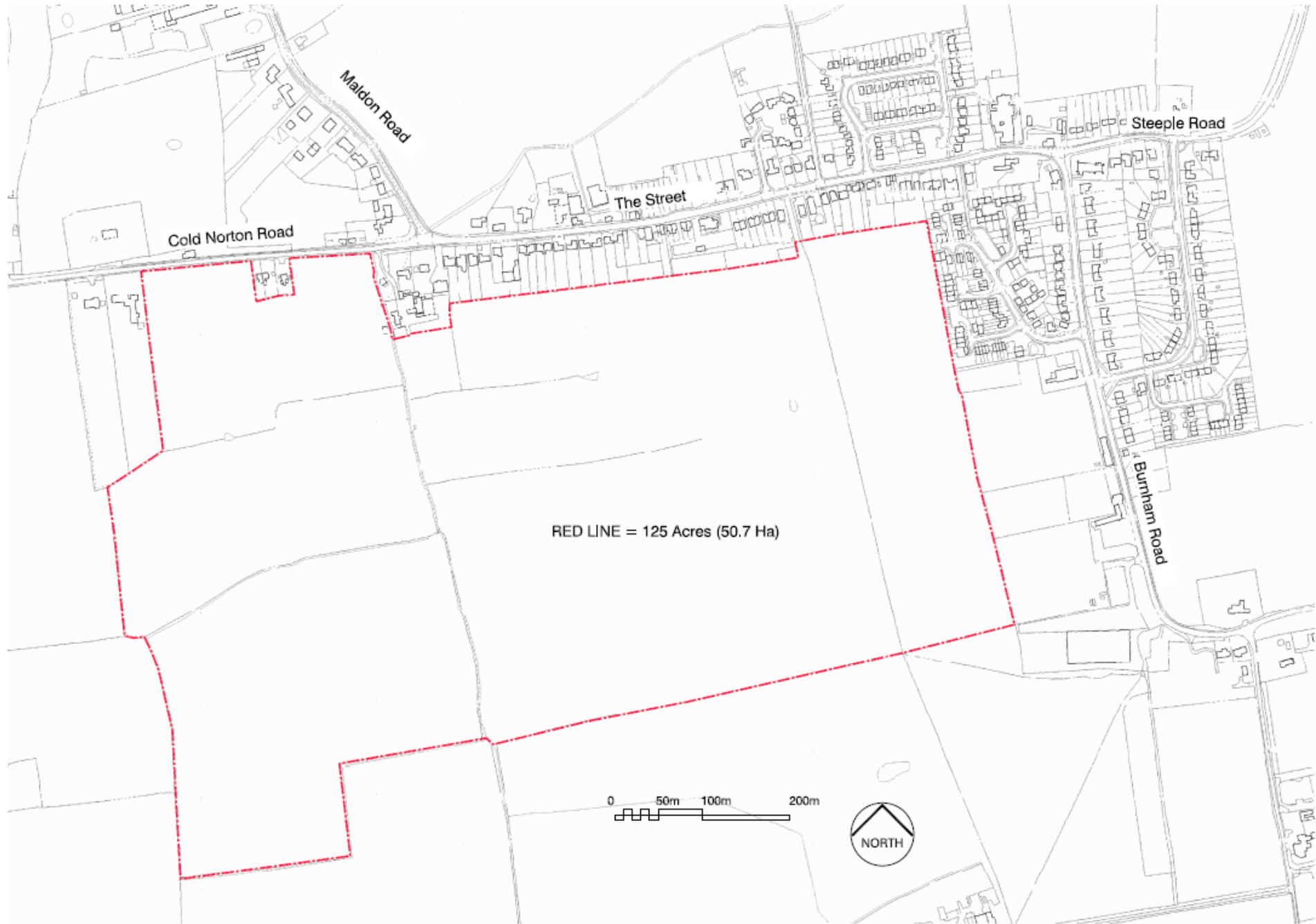
Yes, I wish to speak to the Inspector at the hearing sessions

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.

The above suggested changes to the emerging spatial strategy are a significant alteration to the currently emerging policy platform in the draft Local Plan and require appropriate detailed evidence and a robust case to be presented and debated. It is also important to feed in the results of the on-going community consultation taking place with Latchingdon Parish Council concerning the correct local planning policy framework for the village and in particular the provision of additional market, affordable and community facilities that inward investment is likely to generate.

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.





Preliminary Housing Accommodation Schedule

The scheme shows 100 units (141 houses and 9 flats).

House type 1 (Village Green and Square), 2 bed terraced,	25 no.
House type 2 (Village Green and Square), 3 bed terraced,	27 no.
House type 3 (Village Green and Square), 4 bed terraced,	22 no.
House type 4 (Small cluster of detached barn-type), 4 bed detached,	10 no.
House type 5 (The Closes), 3/4 bed semi-detached,	30 no.
House type 6 (Large low density woodland), 4/5 bed detached,	11 no.
House type 7 (Very large low density woodland), 5/6 bed detached,	16 no.

Note: 9 no. 1 bed flats are located above the community / commercial units on the Village Square.

