

P	S	C					/		
---	---	---	--	--	--	--	---	--	--

Part 2 - Regulation 19 and 20 of the 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 number	<input type="text"/>	b. Policy reference	<input type="text" value="POLICY SZ"/>
c. Proposals map	<input type="text"/>	d. Other section (please specify)	<input type="text"/>

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

- a. **Legally compliant** YES NO
- 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.
- b. **Sound** YES NO
- 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

2.3 Do you consider the Maldon District to be unsound because it is not ... (✓ 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, 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.

For official use only

P	S	C					/		
---	---	---	--	--	--	--	---	--	--

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.

If the box is not big enough for your comments, please attach another page marked appropriately.

SEE ATTACHED COMMENTS

For official use only

P	S	C					/		
---	---	---	--	--	--	--	---	--	--

- 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.

If the box is not big enough for your comments, please attach another page marked appropriately.

SEE ATTACHED SUGGESTED AMENDMENTS

For official use only

P	S	C					/		
---	---	---	--	--	--	--	---	--	--

2.6 Do you consider it necessary to attend and give evidence at the hearing part of the examination? (✓ 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

If the box is not big enough for your comments, please attach another page marked appropriately.

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.

ALAN COOK CONSULTANCY

REPRESENTATIONS ON BEHALF OF LODESTAR PROPERTIES LTD

LEIGH INDUSTRIAL ESTATE THE CAUSEWAY MALDON ESSEX

PRE SUBMISSION DRAFT LOCAL DEVELOPMENT PLAN

11 March 2014

Policy S2 Strategic Growth

This sets out the minimum objectively assessed housing need of 4,410 dwellings with a table of locations and projected phasing.

Comment

We support the increased assessment of housing need but object to the allocations. The LDP does not comply in a material sense with the NPPF in that this requires that planning should actively manage patterns of growth to make the fullest use of public transport, walking and cycling and focus development in locations which are or can be made sustainable. Whilst it states that the supply of housing can sometime be achieved through planning for larger scale development such as village extensions or Garden City extensions to towns, this should not be at the expense of ignoring existing urban areas.

The Leigh Industrial Estate could be such a re-use for housing for the reasons stated below.

Para 2.48 of the policy justification states that Maldon and Heybridge area has been chosen as the major focus for housing development as this is the most sustainable area in the District in terms of access to employment, retail provision and community facilities. Whilst these locations give good access to the strategic road network this is not a good single measure of sustainability and we strongly object to this statement.

Policy S2 seeks to deliver some 2,610 dwellings within 2 new Garden Suburbs and 2 Strategic Allocations across the Maldon and Heybridge areas.

It is considered that this is too high a proportion of the overall allocation and that this should be reduced by at least 10%, with that 10% allocated to existing built areas such as The Causeway and in particular the Leigh Industrial Estate at least.

The table in Policy S2 should be amended to reflect this change with the following additional section S2 (h) under Maldon and Heybridge

Strategic Allocations for Leigh Industrial Estate with a total of 250 units and provided in Year 0-5

The changes made by MDC to Policy S2 after the Draft LDP Consultation including to the North Heybridge Garden Suburb and to the Reserve Sites do not address our concerns. MDC under-estimates the impact of on the highway network of the allocations at South Maldon and the increased allocations at Heybridge.

Sites as Reserve Sites should be considered in edge of town centre locations such as Leigh Industrial Estate.