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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 55"/>
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.

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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

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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.

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

SEE ATTACHED SUGGESTED AMENDMENTS

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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 S5 Maldon and Heybridge Central Area

The Causeway Area is shown as Regeneration Area in the Central Area Key Diagram Fig 6. The Leigh Industrial Estate is at a town centre gateway. We agree with this designation.

The strategy includes at para 3) the régeneration of the Causeway to improve the supply of high quality use class B floorspace and increase employment. Mixed use development is included which will enable significant numbers of jobs to be created.

Comment

We support the designation of the Regeneration Area but object to the lack of effective policies to support this designation.

The whole issue of how regeneration will be achieved is not dealt with in the LDP at all adequately and this absence will not allow regeneration to take place.

Of the total number of dwellings over the plan period of 4,410, too high a proportion than is sustainable rely on the Strategic Allocations and Garden Suburbs.

There should be more efficient use made of obsolete commercial sites in the built up area including Leigh Industrial Estate especially as this is not entirely in B use.

The LDP utterly fails in this respect to understand the mechanics of the regeneration process.

There has been a structural change in employment in the District especially since 2008.

Much of the existing floor space is obsolete and this is recognized in the Employment Land Review Roger Tym and Partners and Fenn Wright March 2009

The LDP contains Key Area Diagram Figure 6. This shows the Causeway as a Regeneration Area with the Causeway/A414 roundabout as town centre gateway.

This is a token recognition of the detailed analysis provided in the Maldon and Heybridge Central Area Contextual Study Allies and Morrison June 2012

There is no consideration as to how the 'aspired' renewal of the Causeway Regeneration Area will be achieved. Regeneration is required and is agreed with and this is the best way of achieving a sustainable future for Maldon town centre as part of a strong retail core strategy – however this cannot be achieved simply by stating –

'Renewal of the Causeway Regeneration Area to improve the supply of high quality Use Class B floorspace (commercial and industrial) and increase employment.'

This assumes that in the absence of public subsidy the private sector will provide this floor space. It will not because it is not viable and will not become viable.

What is required is a more proactive approach along the lines of an 'enterprise zone' with a flexible attitude to any development that enables existing obsolete stock to be replaced with new floorspace that could include residential, hotel, retail and leisure uses.

The policy should be distinguished by redesignating parts of the Causeway Area adjacent to the existing centre and to existing housing and amenity areas as suitable for non B1 development including residential and retail.

New B1 development is only likely to be very limited in the life span of the Plan due to the relative isolation of Maldon as an employment location without a natural hinterland and relatively isolated from the strategic road network.

Introducing new housing and retail uses will underpin the policies for the town centre which are strongly supported by us.

The policy should be amended by the following additional sentence in sub para 3) of Policy S5-

'In addition to Use Class B employment uses a distinction will be made at the town centre gateway sites where residential and replacement retail will be permitted. This shall be designed to boost pedestrian access to the adjacent areas including the Maldon Central Area and Fullbridge'

In the table at para 2.71 the Leigh Industrial Estate shall be added as a residential-led regeneration scheme on a town centre gateway site with other town centre uses including replacement retail and leisure.

There is too much reliance placed on a masterplan approach. MDC should not be seeking to advance these through management groups with the private sector at such an early stage in development plan process as this precludes the consideration of other deliverable sites without the need for and reliance on long term masterplanning.

Figure 5A shows just now unsustainable MDC's approach is as the South Maldon Garden Suburb North Heybridge Garden Suburb will involve the use entirely of land that is NOT previously developed.