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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

b. Policy reference

c. Proposals map

d. Other section (please specify)

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.

The LDP is proposing to allocate 75 houses to North Fambriidge.

This is not sustainable because the sewerage facilities in the village are insufficient to accept any new waste water flows.

Anglian Water has produced a report about the sewerage and surface water problems in the village stating that either £2.1 Million would be needed to upgrade the South Woodham Ferrers treatment works or £2.5 Million would have to be spent upgrading the Latchingdon works before any new waste water flows can be accepted. A copy of Anglian Water's report re planning application OUT/MAL/13/00473 is attached.

In addition the proposal is not sustainable for the numerous reasons detailed in my letter dated 11/10/13 (Copy attached)

As a consequence policies S2 and S7 in the LDP are contrary to the NPPF definition of Sustainable Development.

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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.

The specific allocation of 75 houses to North Fambroge in the Maldon District LDP should be deleted.

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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.



**Planning Applications – Suggested Informative
Statements and Conditions Report**

AW Reference: 0408/SP132(001)
Local Planning Authority: Maldon District Council
Site: Manor Farm, The Avenue, NORTH FAMBRIDGE
Proposal: 30 dwellings
Planning Application: OUT/MAL/13/00473

Prepared by Sue Bull

Date 07 Jan 2014

If you would like to discuss any of the points in this document please contact me
on 01733 414200 or email planningliaison@anglianwater.co.uk

ASSETS

Section 1 – Assets Affected

- 1.1 Our records show that there are no assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary.

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

- 2.1 The foul drainage from this development is in the catchment of Latchingdon Water Recycling Centre (WRC) that does not currently have capacity to accept these flows. However, an alternative WRC at South Woodham Ferrers does have capacity to accept these flows and therefore this would be the recommended WRC to be used.

Section 3 – Foul Sewerage Network

- 3.1 Development will lead to an unacceptable risk of flooding downstream and mitigation in the form of upgrades to the network will be required. The drainage strategy for the site should cover the procurement of the improvement works.

We request a condition requiring the drainage strategy covering the issue(s) to be agreed.

Section 4 – Surface Water Disposal

- 4.1 The surface water strategy/flood risk assessment submitted with the planning application is not relevant to Anglian Water and therefore this is outside our jurisdiction for comment and the Planning Authority will need to consider which is the appropriate body to comment.

We request that the agreed strategy is conditioned in the planning approval.

Section 5 – Trade Effluent

- 5.1 Not applicable

Section 6 – Suggested Planning Conditions

Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is mindful to grant planning approval.

Foul Treatment & Sewerage Network (Sections 2 & 3)

CONDITION

No development shall commence until a foul water strategy has been submitted to and approved in writing by the Local Planning Authority. No dwellings shall be occupied until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority.

REASON

To prevent environmental and amenity problems arising from flooding.

Surface Water Disposal (Section 4)

CONDITION

No drainage works shall commence until a surface water management strategy has been submitted to and approved in writing by the Local Planning Authority. No hard-standing areas to be constructed until the works have been carried out in accordance with the surface water strategy so approved unless otherwise agreed in writing by the Local Planning Authority.

REASON

To prevent environmental and amenity problems arising from flooding.

The Chief Planning Officer
Local Development Plan Preferred Options Consultation
Maldon District Council
Princes Road, Maldon
Essex, CM9 5DL

Mrs J L Cooper
River View Cottage
Brabant Road
North Fambridge
Essex CM3 6LY

11 October 2013

Dear Sir/Madam

Re: Local Development Plan Preferred Options Consultation – North Fambridge

I note that the Draft Local Development Plan 2014-2029 Second Consultation still identifies 75 new houses for North Fambridge within a five-year span. The village is unable to cope with this volume of new houses and I object to this allocation for the following reasons:

Housing Density – Although the consultation discusses a diversity of housing the focus is on 1-2 bedroom dwellings, 40% being affordable. The density is 30-50 per hectare. At 30 per hectare this would provide terraced housing or flats and some other smaller houses. At 50 per hectare this could only allow flats. This is out of keeping with the rest of the village and does not comply with the stated objective to “retain the identity of our villages”.

Schools – The current catchment school for the primary age group is Purleigh. Children are taken by bus to it and it is already oversubscribed. The proposed catchment school is Latchingdon which is a faith school and may not be acceptable to residents. Children of secondary school age group would have to be taken by bus 7 miles to Ormiston River Academy in Burnham. Burnham is allocated an additional 450 houses and it is doubtful that the school would be able to cope with this and 75 extra houses in North Fambridge.

Highways – The B1012 is already a dangerous road with several recent accidents including a fatality last month and 2 fatalities last year. There is only one narrow road into the village. The turning into North Fambridge is recognised as an accident reduction zone but is incapable of improvement. The turning is very difficult to get into and out of at busy times and is very dangerous. Motorists travelling too fast from the Burnham direction cross the middle white line and cause accidents with cars waiting to turn into North Fambridge from the South Woodham Ferrers direction. The combination of 75 houses in North Fambridge and 450 in Burnham would seriously increase road usage and accidents. Any upgrades would be at the expense of the developer.

Transport and Sustainability – Despite a train service, transport links are poor. Shift workers cannot use the train as the last train from Liverpool Street departs at 2200. Trains are only one an hour and many workers who commute to London drive to Wickford to catch the train. Links to workplaces in Maldon, Chelmsford, Basildon and further afield in the county require a car. The cost of an annual season ticket to Liverpool Street is £3,800 and rising and requires employment in a relatively well paid occupation.

Hospital Links – Transport links to Broomfield Hospital in Chelmsford are very poor and even with the provision of an on demand bus/taxi service, long journeys by bus with at least 2 changes are required. Most villagers require transport by car. There are only very limited medical facilities at St Peter's Hospital in Maldon, which is difficult to get to without a car, again requiring the on demand taxi service and then a change in Althorne for the bus.

Employment - There is little employment in North Fambridge with a few positions in Deerlands Nursery, Yacht Haven, the Ferry Boat Inn and Roe's Jetting Services. There is very little opportunity for the unskilled and they would have to seek positions outside the village involving difficult and expensive travel. There is no provision in the draft Local Development Plan for the expansion of employment opportunities.

GP Services – The Local Development Plan admits that GP services in the Maldon District are already oversubscribed, including the surgeries at Burnham and Maldon; despite this it states that in relation to North Fambridge "there appears to be existing capacity to accommodate the demand for medical provision". This is clearly not the case for the extra 75 dwellings. This is an insufficient number for an additional GP but too much pressure for existing medical practices. It is difficult to envisage the nature of the enhanced medical provision stated in the Consultation document.

Flood Risk – Much of North Fambridge is within the flood zone. An additional 75 houses would increase the risk of surface water flooding even if the SUDS (Sustainable Drainage Systems) approach is used.

Sewerage and Surface Water – Since 1974 the Parish Council/Residents have been in dialogue with the local MP/Maldon District Council/Anglian Water/OFWAT regarding the inadequate sewerage system in North Fambridge. Flooding and/or backing up have occurred on a regular basis because of the inadequate infrastructure. Any more housing will increase pressure on an already overloaded system and will make it even more "unfit for purpose". Surface water issues cause backing up of the sewer system and flooding of gardens at Franklin Road causing a health hazard and damage to property.

Environmental Issues – North Fambridge has extensive SSSI sites, a Ramsar site and an Essex Wildlife Trust reserve. The building of 75 houses must impact on the wildlife in the area with the loss of agricultural land, for example the resident barn owls and bats will have reduced areas over which to feed. The draft Local Development Plan does not mention specifically the environmental significance of these areas in North Fambridge.

Lighting – Any new development would be required to install street lighting.

Lack of amenities – There are no shops and a lack of other amenities such as post office, bank, dentist, leisure centre etc and in order to access these amenities travel outside the village mainly by car is necessary.

There is no reference in the Consultation Document to the North Fambridge Village Plan and Village Design Statement.

The reason for the allocation of 75 houses is stated to be because of its proximity to a higher level of services in South Woodham Ferrers, the railway station and access to employment opportunities in South Essex. Many of these facilities are only accessible by car or a long walk from SW Ferrers railway station. Other villages are in close proximity to services in Burnham on Crouch or Maldon and have access to employment opportunities in South Essex, Maldon, Chelmsford or Burnham so there is no coherent rationale for singling out North Fambridge for the specific allocation of 75 houses.

For all the above reasons the proposals for 75 additional houses in North Fambridge are poorly thought out, are unsustainable, cannot be supported and should be scrapped.

Yours faithfully

Mrs J L Cooper