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Part 2B - 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.

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

- | | | | |
|---|----------|--|---|
| e. Paragraph
(please specify paragraph number) | 5.4, 5.5 | f. Policy
(please specify policy reference) | Policy H1
Affordable
Housing |
| g. Proposals Map | | h. Other section
(please specify) | |

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

- c. 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**
- d. 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)

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

- e. Positively prepared** ✓
To be positively prepared the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements
- f. 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.
- g. Effective** ✓
To be effective the plan must be:
 - Deliverable;
 - Flexible;
 - Able to be monitored.
- h. Consistent with National Policy** ✓
The Plan must be consistent with Government guidance as set out within the National Planning Policy Framework

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2.11. 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.

SUBMISSION B

Flawed logic sequence that seems to have determined the Overall Minimum Number of Extra Affordable Homes:

We consider that the Proposed 40% minimum 'Affordable Homes' Content is both unsound and unsustainable compared with other available alternatives both in Maldon District and in wider Essex – in particular being in excess of 'Burnham's own Needs' (per Policy Clarification Para 2.81)

However we are fully supportive of appropriate increases in Affordable provision to meet identified data rational needs so that:

- The children of local families can stay in their home area (assuming that there are adequate suitable local career opportunities) and
- Aging long-time residents can sensibly trade-in their present family size homes to downsize to meet their changing circumstances and requirements. We particularly endorse the SHMA statement *"In effect up to three or four household moves could result from the delivery of one new older persons unit" – Para 7.3.6, Page 72 – Thereby reducing the need for dramatic supply-side increases.*

But we consider it totally unsustainable for excess provision to be created to attract incomers from out of the area as has happened in the past. E.g.: Presently over 40 affordable homes in Burnham are blocked off from occupation by locals (being operated by a London based Housing Association).

- Despite the declared strategy of only meeting Burnham's own requirements, we can see nothing in the evidence base to show that any detailed rigorous analysis has been carried out to quantify Burnham's own Affordable Home Needs. In addition the macro District level 'analysis' effectively excludes private rented accommodation - Worrying when the Government commissioned English Housing Survey recently reported a significant shift in 2012/13 when for the first time since records began in 1980, more people nationally were shown to be living in private rented accommodation than social housing
- In any event pragmatic supply/demand market data in the LDP evidence base suggests that Burnham isn't presently an area with major housing affordability issues. For 1-2 bed properties (where the greatest District shortages are said to lie) Burnham is already one of the most financially accessible locations in the District for those on low incomes in terms of the lowest rental income thresholds and also has the lowest income thresholds to buy
- The closure of Bradwell Power Station as the decommissioning phase draws to a final conclusion is progressively releasing large Dengie Peninsula private rented accommodation on to the market - this will have a major role in helping to accommodate local Burnham residents in search of affordable homes. NB: This resource is not included in the SHMA calculations. Since Bradwell decommissioning started in 2002 there have been 350 staff employed, with up to 500 additional contractors at different points in the programme so the freed up accommodation levels are highly significant to any proposal to build extra provision
- The figures for 'District Demand' for Social & Affordable Housing are distorted by the register being open to *'any Resident of the UK, the Channel Islands, the Isle of Man or the Republic of Ireland'*. In remote areas without employment opportunities, challenging communications and lack of infrastructure, this risks creating a 'requirement' that should not be allowed to distort the true Burnham 'Local' Demand/Need. This would be contrary to 5.21 *'Provision for specialist housing will be welcomed within the District where it can be shown to be contributing towards meeting an identified local need'*
- People on minimum wage or benefits, housed in excess Affordable/Social Housing on the remote

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edges of a poorly/expensively connected town, risk being trapped in a self-perpetuating cycle of deprivation as they can't afford to commute to where there are jobs, nor even easily travel to BoC's services, most of which are sensibly focussed 'over the rail bridge' over a mile distant

Regarding **Policy H3 Accommodation for 'Specialist' Needs Housing out of area.** *Elderly people stuck out in remote edge of town BoC sites in excess of Burnham's Needs would be unsustainable and socially undesirable.,*

Re Para: 2.82 Healthcare Provision: GP Surgery capacity is only one small part of the key healthcare issues for any aging population. *The nearest 2 MEHT NHS Hospitals for routine clinic appointments and accident/emergencies (Broomfield & Braintree) are both around 60 minutes distant each way.(with appalling public transport connectivity/convenience). Clearly unsustainable in terms of quality of care, affordable access, greenhouse gas impact (from intensive use of private cars and ambulance vehicles) and ensuring safe clinical outcomes for patients compared with travel from closer locations*

Policy S6 Burnham states: 3) Safe pedestrian and cycle linkages are provided from the development to the town centre, other public service facilities and the existing urban area; *The proposed three edge of town proposed estates cannot achieve this 'joined up' vision in view of the constraints at the narrow rail bridge and the Fiveways and Maldon Road junctions. A Single Mum on benefits, unable to afford a car would find it extremely difficult to get children to schools, GP Surgery or Burnham Clinic on a timely basis. In particular, most of the 'main' road accesses to the proposed sites don't meet the minimum sustainable design standards in the 2012 ECC Development Construction Manual . The feeder 'Distributor' road to the sites should be at least 7.3m wide or 6.75m wide with 2 x 2m footways. Today for example, Maldon Road the main access road to BoC AND to the Burnham West site, has the carriageway from Creeksea Lane westwards to the town boundary the carriageway at only approx 60% of the standard width with domestic boundary fencing/wall on the south side and only one narrow footway on the north side. Ferry Road and Creeksea Lane are single vehicle width with no pavements. Green Lane has also been previously been judged by MDC as being unsustainably narrow*

Policy S3 –Place Shaping states 8) "There will be a network of safe and usable paths and streets for pedestrians, cyclists and vehicles. This network should prioritise accessibility to open spaces, education and health".. *For aging and poorer residents without their own car, convenient safe travel to the centre of town from the edge of town estates built on green fields will be virtually impossible – It would be far more sustainable to focus Affordable Homes on brownfield developments in the envelope of the main town East of the rail bridge.*

Policy H3 Accommodation for 'Specialist' Needs (2) Requires that the development is located in an area that is sustainable to meet the **social** as well as housing needs of the intended residents – *Most Affordable Home residents are unlikely to be able to afford private transport to easily or safely travel to the services in the town centre across the rail bridge – Especially the elderly, disabled and parents with buggies. These people would be virtually marooned in their out of town estates*

2.12. 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.

Policy S2 - Strategic Growth and Policy H1 Affordable Housing

Burnham's actual Affordable Homes Needs must be calculated and cast to be totally consistent with Para 2.4 i.e.: a 'level of growth for Burnham-on-Crouch to meet its Own Needs'. Common-sense dictates that a policy to meet Local Burnham Needs cannot be framed until and unless these local needs have actually been researched and defined. It's important that MDC make a proper effort to robustly calculate the correct required number of Affordable Homes in BoC/The Dengie. Too few and our young people will forced to move away, too many and we risk creating an unsustainable dynamic by attracting economically marginal incomers who will then not have any realistic opportunities for local work or even for

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affordable/sustainable commuting to where jobs actually are. To be consistent with **Policy Clarification Para 2.81**, BoC's Affordable Homes 15 year target also needs expressing as a 'Maximum' rather than a 'Minimum' number

- **To indicate the Intent of Affordable Housing Provision in Burnham; H1 and S6 LDP Policy Wording needs to reflect that for Burnham in line with other remote area's Affordable/Social housing policies, MDC and Housing Associations will all "limit tenancies to people who have lived or worked in Burnham-on-Crouch for the previous three years, or who have a close relative living locally."**... To illustrate this issue: Presently over 40 affordable homes in Burnham are unsustainably blocked off from occupation by locals (being operated by a London based Housing Association).

The BoC Affordable/Social Homes analysis also needs to take into account:

- The effects of freed-up 1-2 bed private rental accommodation in the Dengie Peninsula following the closure of Bradwell Power Station and the consequent exodus of hundreds of peripatetic workers who previously occupied them. NB: The recent ruling by European Commission on the Hinkley Point Nuclear Power Station deal, makes it very unlikely that a new nuclear station will be built in Bradwell in the foreseeable future
- The virtuous circle of affordable property recycling/reuse as elderly people downsize to reflect their revised requirements will substantially mitigate the need for much extra provision to meet the needs of an ageing local population
- PPG Paragraph: 019 Reference ID: 3-019-20140306 –To date MDC has not accessed the suitability of the identified use or mix of uses of a particular site or broad location including consideration of the types of development that may meet the needs of the community. Particularly for the needs of Affordable Housing residents and older people

Placing necessary Affordable Housing within the traditional envelope of BoC, East of the rail bridge, preferably on brownfield development seems a sustainable solution that will also keep our elderly and youngsters in the heart of the community. This in line with PPG Paragraph: 001 Reference ID: 2b-001-20140306 "town centre first' approach'

2.13. Do you consider it necessary to attend and give evidence at the hearing part of the examination? **Yes please. Mr Dennis Price (Chairman of BROOD) wishes to respond on this particular element of our submission)**

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

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

Burnham on Crouch residents have made numerous submission responses to successive LDP 'Consultations', signed/submitted petitions and in various Town and District Council meetings pointed out the flaws, inconsistencies and unsustainable/unsound implications of the LDP drafts.

We hear about Localism as being at the heart of the LDP Process, but disappointingly our views have not been listened to so far. We realise that this is virtually our last opportunity to be heard