

For Official Use Only

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Part 2D - 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.

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

- | | | |
|---|---|--|
| <p>m. Paragraph
(please specify paragraph number) _____</p> <p>o. Proposals Map _____</p> | <p>n. Policy
(please specify policy reference)</p> <p>p. Other section
(please specify)</p> | <p>Policy S2
Strategic Growth</p> <hr/> <p>S2(i), S2(j), S2(k) and RE3</p> <hr/> |
|---|---|--|

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

- g. 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**
- h. 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)

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

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

2.25. 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 D

Flawed sequence that determined the aggressive cadence of 90% of extra housing in BoC into the first 5 years of the LDP:

The issues detailed in our Submissions A-C would be further compounded by an aggressive telescoping of 90% of the targeted extra homes into the first five years of the plan period (Developer and MDC Planning Department led, to 'tick the box' to provide artificial evidence of a 5 year land supply). This being contrary to the spirit of PPG Paragraph: 030 Reference ID: 3-030-20140306

–90% of Build going into the next 5 years would create a destructive oversupply far in excess of Burnham's actual needs on an absolute and annualised basis

The indicated minimum of 390 extra Houses in the first 5 years of the plan, with a minimum content of 156 extra Affordable Homes are very large rocks to throw into this very small remote pool. All apparently created by the unplanned/unthinking convergence of two separate draft policies by two separate MDC departments, aggravated by some political horse-trading.. The front loading of 90% all Burnham developments to the first five years of the LDP Plan and the 40% minimum Affordable Homes content requirement

Common sense would appear to show that BoC's Needs for regular and Affordable Homes (once quantified!) are most *unlikely* to reveal a demand pattern that crams 90% into the first 5 years and only 5% into the next two 5 year periods. Data rational analysis needs to be completed rather than MDC trying to 'tick the boxes' to prove its overall 5 year land supply for the total District

Excess supply will attract economically marginal incomers, who will then be trapped without sufficient jobs, within a remote corner of the county suffering from poor service and infrastructure provision. Burnham risks becoming a Clacton, South Lowestoft, or Great Yarmouth with the newly created estates being full of trapped unproductive economic refugees

Building 156 minimum extra Affordable Homes in the 3 edge of town sites in a five year period appears in conflict with Policy H3 Accommodation for 'Specialist' Needs (3) It will lead to a concentration of similar uses that would be detrimental to the character and function of an area and/or residential amenity;

2.26. 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.

Whatever the final Local Needs Analysis shows (when put in train!), the provision of extra houses and affordable homes needs smoothing out in accord with calendarised objectively assessed organic growth in Burnham's verified forward needs. (This would also create synergist benefits of making the scale and pace of construction more suited to local building companies who could then create more much needed local jobs and apprenticeships to boost long term local employment and prosperity.)

Consistent with the policy to only sanction extra housing to meet Burnham's actual objectively quantified needs the final number of regular and affordable housing in the first five years has to be qualified in the final LDP as '*Maximum*' rather than '*Minimum*'

2.27.

Do you consider it necessary to attend and give evidence at the hearing part of the examination? **Yes please. Ms Wendy Stamp (Treasurer 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

2.28. 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