

Inspector David Vickery DIPT&CP MRTPI
 c/o Mrs Andrea Copsey, LDP Programme Officer
 (via email and post as requested)

14th April 2015

Subject: Representation regarding Maldon District LDP Matter 2: Strategic Housing Growth: Implications of DCLG's 2012-based Household Projections (published on 27 February 2015)

Dear Mr. Vickery

Further to our MDC EiP EiP submissions, I am writing to you on behalf of the members of *BROOD* and *Say No to Burnham West* groups in response to MDC's proposed Strategic Housing Growth target of 310 upa, which we believe is too aggressive in the light of the very latest data:

- You'll remember that at the EiP hearings, we said that despite our very strong concerns on relative sustainability, we reluctantly accepted the 450 Housing Growth target for Burnham-on-Crouch to help ensure that the district potentially enjoyed the protection of what we saw as a flawed plan rather than no plan. This acceptance was based on the assumption of the accuracy of Household Growth base data on which MDC had based the overall LDP District Growth targets

It now seems totally clear that the actual growth in household formation will be significantly less than that originally forecast by MDC.

In our opinion, the overriding provision suggested by MDC to cater for *possible* net outflows from London in years to come is inadmissible and should be completely discounted. There isn't an approved analysis let alone an approved plan in place to suggest that such a movement of people will definitely take place, nor that if it did Maldon District would be called upon to accommodate any of these people. Eliminating this entirely inappropriate provision would indicate a conservative Maldon District requirement of 295 upa (DCLG midpoint) extra homes. i.e.: 225 fewer over the plan period than MDC currently assume in their 310 upa plan. On the above basis, we request that you consider recommending the reduction of the overall District plan target by 225 houses, to make the LDP Sound

Both in the Pre-submission Material and our EiP presentation, we demonstrated that except for a few very high salaried rail commuters to London; Burnham on Crouch/The Dengie are by far the very *least* sustainable locations for extra housing in the entire Maldon District. Given the lower numbers referred to above, we believe that in this context it would now be entirely appropriate to limit Burnham's plan target to a capped volume of 200 extra dwellings over the plan period (as we originally proposed) - consistent with MDC LDP Policy Clarification Para 2.81 'to limit the level of growth for Burnham-on-Crouch (BoC) to meet its own needs'. This reflects:

- Our remote location (15 winding miles/30 minutes driving to the nearest A Road)
- 4-5 straight decades of Employment Decline, culminating in the loss of 1200 jobs when Bradwell Power Station and CEFAS Laboratory both recently closed
- Very high levels of long distance commuting from Burnham by car/van to where there are jobs, creating unnecessary extra greenhouse gases - Far more sustainable for housing to be located close to where there are jobs
- A major 'competitive' thrust by better connected surrounding towns, investing in major new business and industrial parks to create well located new employment
- Substantial extra housing (not in the LDP) recently approved in our area (which shares a common pool of infrastructure, facilities and employment with Burnham) NB: On April 14th one of your fellow Planning Inspectors commences hearing two appeals by Gladman Developments for 200/220 extra homes in Southminster and Strutt & Parker are progressing their own appeal for an extra 75 houses on Land South Of Marsh Road -

Many thanks for your consideration

Mrs Natalie Bettany, Secretary BROOD, [REDACTED], Secretary BROOD
 on behalf of *Burnham Residents Oppose Overdevelopment (BROOD)* and '*Say No to Burnham West*'
 FaceBook Group <https://www.facebook.com/groups/357763210959917>