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Save Maldon Action Group
Maldon

Mr David Vickery
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Dear Mr Vickery

Save Maldon Action Group further comments on Sustainability Appraisal (SA) of the Maldon District Local Development Plan

The Save Maldon Action Group has looked at the court cases quoted in your letter dated 17th March and consider they do not affect the issue which Andrew Martin Planning raised in their letter dated 16th March because they say nothing about there being no need to appraise all reasonable alternatives.

Although MDC claim that they have tested and consulted on a number of options, they have not. All the way through, this plan has been presented as the only option.

The LDP Preferred Options consultation document (DOC 51) was not of options all coherently presented for public consultation, but an already huge and costly pursuit of the councillors preferred option of a suburban sprawl around the town of Maldon. There was never any consideration given to consolidating growth in a new settlement. DOC 51 considered a settlement of 1000 houses only, right next to South Woodham Ferrers.

The Preferred Growth Strategy Paper EB061 considers various scenarios, all of which have the majority of growth in Maldon, Heybridge and Burnham. Scenario 3 – Enhanced South West Growth, mentions a new settlement but still involves the main growth to the existing towns with only 1000 dwellings in a new settlement. Well that's smaller than one of the garden suburbs that Maldon and Heybridge are getting. It's not enough housing to deliver any of the infrastructure that would be required in a new town.

The reason for discounting the option of a new settlement (if you can call 1000 houses a new settlement) was primarily due to the need for the Council to demonstrate short term housing delivery through the LDP. But we do not believe these complex garden

suburbs under multiple land ownership and with huge infrastructure requirements will be any better at delivering the 5 year land supply.

There was never any consideration of **two-pronged approach** discussed by Geoffrey Vale at the EIP that the Inspector agreed should be included in the Addendum to the SA. This approach (description attached) is a reasonable alternative and would involve dispersing growth throughout the district to meet the 5 year land supply, whilst planning for a new settlement that could meet the projected housing need. This option has NOT been properly considered.

There appears to have been no consideration of locating more development nearer to sustainable transport links, even though para 7.3 of the LDP says that railway patronage could be increased by 'improving train stations and improving connections to rail stations'. Maldon has a very high level of out commuting, one of the highest in Essex (See Barton Willmore SHMA). Around 71.7% of Maldon residents travel to work by car, higher than all the other benchmark areas (Strategic Housing Market Assessment 2013). The Core Strategy and Issues Document in 2007 (DOC50) states that the Highway Agency regional traffic flow model finds that most car journeys to work are to the outer East end of London such as Grays and that the only direct Public Transport service between the Maldon District and these areas is the crouch Valley line. Why hasn't an option with more sustainable transport links been considered? The **'preferred option' we are told will result in a 5 minute additional delay at Eve's Corner**. However, this is 5 minutes on top of the existing delays which results in an **overall delay of approximately 14 minutes**. A delay which the Inspector said at the EIP would **make the plan unsound**.

The public have been given the impression that there were no feasible alternatives to the 'preferred option' and that by agreeing to this plan all sorts of gains would follow, including (See question 11 with the Draft Plan consultation) a new hospital.

Residents in 2007 may have indicated a preference for development near existing centres but they believed it "should be of a modest scale". We, as residents, did not sign up to these enormous garden suburbs and we weren't given the chance to comment on any alternative options.

The Royal Town Planning Institute makes the sensible assessment that if the public feel that engagement has happened too late for their views to be implemented then they may cease to continue their engagement. In other words, we were consulted after all the major decisions had been made so we didn't bother replying.

MDC have misrepresented the results of the Consultation in their SD05 Statement. For example, if you look at para 8.15 (c) they state that 47% of the public agree with the proposed distribution of growth in Maldon. Our calculations based on the raw data obtained from Appendix A of the report to the P&L Council Meeting on 10th December 2013 shows that the actual figure is 8%.

They haven't re-consulted when the plan changed. For example, increasing the number of houses from 900 to 1235 in Heybridge.

Another reason for ploughing on with their preferred approach and an argument used to threaten the public into the acceptance of this LDP was that without it we would be open to speculative applications that will automatically be approved. This is not the case as the Inspector has outlined. Any development must be sustainable and would not automatically be granted if the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

All the reasonable alternative sites and those not considered reasonable must be included in an addendum with the final SA. The public must also be consulted on these options. However, as Andrew Martin Planning states in their letter of 16th March 2015, this may lead to a different conclusion. If the public had really been consulted on a full range of alternatives, we would probably already have a very different looking LDP.

The Save Maldon Action Group does not believe that an addendum to the SA can make the plan 'sound' and 'legally compliant'. It will merely serve to highlight the fact that MDC have not fully considered all the reasonable alternatives prior to the submission of the plan and therefore have not considered all the information that should have been available to positively influence the plan. Instead they have followed a 'policy-on' approach of their 'preferred option'.

The Save Maldon Action Group believes that on the basis of lack of consideration of the reasonable alternatives, this plan is not legally compliant. And furthermore, the preferred option will not benefit the district of Maldon and better our lives and that of future generations.

Yours faithfully

Kath Vale

DESCRIPTION OF ALTERNATIVE TO MALDON LOCAL DEVELOPMENT PLAN PREFERRED SPATIAL OPTION

A reasonable, and fairly obvious, alternative option is that of a new settlement and in the Preferred Option Consultation **Maldon District Council, without adequate investigation of it, had ruled out this alternative option.** In the MDC Preferred Options consultation, and our group of local architects' draft consultation response, this appeared as a settlement within the Crouch corridor.

It ought to be pointed out that that option is by no means the only option. A new settlement could, for instance, be in the north of the district and its degree! Of sustainability given by proximity to the A12 and Liverpool Street/Norwich main rail line. However the Crouch/B1102 'corridor' option is the option identified, and probably **the better option because of the benefit of the rail link to London, the the A132 link, designed for the purpose, and the relative economic and practicable feasibility of improvement** compared with the A414 through Danbury or B1019 to the A12 in the vicinity of Hatfield Peverel.

The basic approach to the option I've outlined is **a simple two pronged strategy based upon limiting the impact of Growth upon all the existing settlements.** There are 35 settlements of various sizes within the district, ranging from villages of 100 to 900 population to larger settlements of 1000 to 14000 population.

In order to achieve a five year supply something like 1,750 dwellings would need to be built over the first five years of the plan. This would first be considered as dispersal proportionate to the size of each existing settlement (1,750 divided by 35 settlements = 50 houses on average). In practice because some existing settlements, usually with a population above 1,000, will have more facilities such as shops and maybe a community hall, a church or a pub) so that the proportions might be re-adjusted accordingly to take account of sustainability. For the exercise here I've assumed that **villages under 1,000 population would see growth, on average, of about 30 dwellings and larger settlements/towns of more than!1,000 population would have, again proportionate to size and facilities have on average about 100 new dwellings.**

This is a broad descriptive approach, merely to show the sort of alternative plan envisaged, but the result would be something along the following lines:-

Continued from side 1 of 2

Spatial Strategy and fit to NPPF 5 year supply and "preferred" timescale	Additional dwellings
<p>1 Dispersal for 5 year supply timescale</p> <p>i) villages under 1,000 population 23 no. settlements x say 32 dwellings on average = <i>(32 dwellings at average 30 per hectare = 1.06ha x 32 = 24.4ha)</i></p> <p>ii) towns/settlements over 1,000 population with greater facilities 11 no. towns/larger settlements x say 100 dwellings on average = <i>(100 dwellings at average 30 per hectare = 3.3ha x 11 = 36.3ha)</i></p> <p>Total of above (Currently assessed 5 year supply 1,739 + 5% buffer = 1,826)</p>	<p>736</p> <p><u>1100</u></p> <p>1,836</p>
<p>2 New town/settlement 10-15+ year supply ("preferred") timescale</p> <p>Say 2,750 + 5% buffer = 2,888 <i>(2,888 at average 30 per hectare = 96 ha)</i></p>	<p><u>2,888</u></p>
<p>Total supply</p>	<p>4,724</p>

Profligate land-take

One salient piece of evidence base given by the Council's advisers upon the LDP was that of **the paramount part that land costs play in development**. These may see up to 100 times the current land use value being realized upon gain of a planning permission granted by the Council; one could say a grant of permission on behalf of the community. There are very few opportunities across the world at present, other than land in the south-east of England, where investment might be so attractive.

From the above table you can see that such an alternative plan as described here need only take something like (24.4+36.3+96) say 157 hectares. I would direct you to **the annotated maps accompanying this written description** to enable visualization of the spatial issues. 96 hectares for a new settlement is not tight bearing in mind that a high ground settlement with the benefit of access to, and views of, open country around it might quite acceptably, even desirably, have an average density well above 30d/ha. **The total of some 157 hectares as compared with the preferred option LDP green field land-take of some 350 hectares shows the latter to be not only rash strategically but also unnecessarily profligate.**

MALDON DISTRICT ALTERNATIVE PLAN (2 PRONG)

EW1-M01-05

Approximation of Environment Agency combined flood risk areas

Given the cost and scarcity of land, its use for some recent development is profligate (for example 8 dwellings per hectare for a recent Maldon town centre development accessed from the bottom of Market Hill) The new proposed Garden Suburbs are 13-14/ha (5 to the acre) when calculated against the gross footprint of land taken. The traditional Garden Suburb would have been 35-38/ha. (14/15 to the acre as at Hampstead - though Raymond Unwin, responsible for Hampstead Garden Suburb was known as "12-to-the-acre Unwin"). However it is questionable that Garden Suburbs to London are an appropriate approach to country towns, let alone Ebenezer Howard and the TCPA vision of Garden Cities. Victorian 'Bye-law housing' would have been 24-26 to the acre or 60-65/ha. There are many beautiful small historic hill towns whose density would be twice that, but of course they benefit from direct access to and view of the countryside around.

Maldon Town Centre to:-
Broomfield Hospital 15 miles
Stansted Airport 28 miles



A414 to Chelmsford
Transport infrastructure upgrades bypassing unrealistic even with large public purse intervention

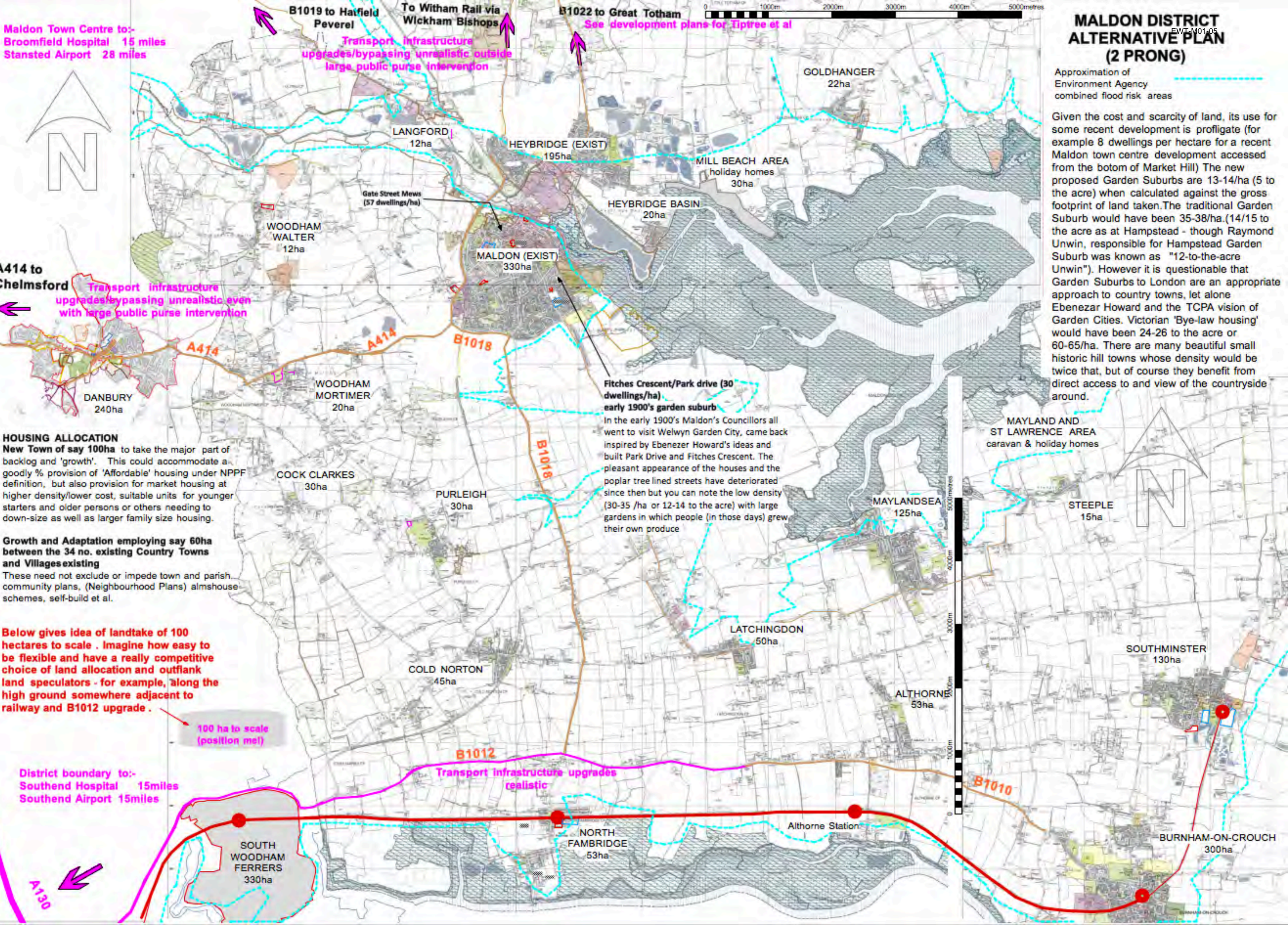
HOUSING ALLOCATION
New Town of say 100ha to take the major part of backlog and 'growth'. This could accommodate a goodly % provision of 'Affordable' housing under NPPF definition, but also provision for market housing at higher density/lower cost, suitable units for younger starters and older persons or others needing to down-size as well as larger family size housing.

Growth and Adaptation employing say 60ha between the 34 no. existing Country Towns and Villages existing
These need not exclude or impede town and parish community plans, (Neighbourhood Plans) almshouse schemes, self-build et al.

Below gives idea of landtake of 100 hectares to scale. Imagine how easy to be flexible and have a really competitive choice of land allocation and outflank land speculators - for example, along the high ground somewhere adjacent to railway and B1012 upgrade.

100 ha to scale (position me!)

District boundary to:-
Southend Hospital 15miles
Southend Airport 15miles



To Witham Rail via Wickham Bishops
See development plans for Tiptree et al

Transport infrastructure upgrades/bypassing unrealistic outside large public purse intervention

Fitches Crescent/Park drive (30 dwellings/ha) early 1900's garden suburb
In the early 1900's Maldon's Councillors all went to visit Welwyn Garden City, came back inspired by Ebenezer Howard's ideas and built Park Drive and Fitches Crescent. The pleasant appearance of the houses and the poplar tree lined streets have deteriorated since then but you can note the low density (30-35 /ha or 12-14 to the acre) with large gardens in which people (in those days) grew their own produce

Transport infrastructure upgrades realistic

