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# Maldon District Local Development Plan 2014 – 2029

Examination in Public January 2015 – Legal Compliance  
and Housing Policies

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Response to Matters, Issues and Questions raised by  
Inspector David Vickery

Matter 4 : Strategic Housing Growth – South  
Maldon Garden Suburb and Park Drive and  
Heybridge Swifts, S2, S3 and S4 (also H1, H2, I1  
and I2 – but only as affect these sites)

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Andrew Martin – Planning  
Intermodal Transportation Limited  
WSP

on behalf of

landowners, Messrs. Hughes and Sandy

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Land to the East of Broad Street, Green Road and North of Lofts  
Farm Drive, Heybridge (known as ‘Lofts Farm’).

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January 2015



**1.0 ISSUE 1 : WHETHER POLICIES S2, S3 AND S4 WITH THEIR ASSOCIATED TEXT DEALING WITH SOUTH MALDON GARDEN SUBURB AND PARK DRIVE AND HEYBRIDGE SWIFTS IS JUSTIFIED BY THE EVIDENCE, CONSISTENT WITH NATIONAL POLICY, AND EFFECTIVE**

**Points 1, 2 and 3**

Suggestions by the Council that a planning application for SMGs was due months ago (September 2014) this has yet to materialize. A position statement prepared as appendix 10 to CED10 is also not available on the Council's website. This must cast doubt on the deliverability of the proposals. If an application is forthcoming in advance of the Hearing Sessions then we reserve the right to comment further on this as we do that relating to the NHGS. In the absence of a planning application or position statement the response to point 3 must be that insufficient information about 'what, where, when and how' this will be delivered is unknown and this does not meet the requirements of the NPPF nor specifically the PPG.

**Point 5 – Transport Issues (ITL)**

Refer to our response in Matter 3, point 6.

**Point 6**

Refer to our response in Matter 3, point 4 .

**Point 7**

Any identified works that have been agreed with CCC for Eves Corner by the time of the Inquiry should be specifically scheduled and referred to in the IDP and CED10 Appendix 13 updated.

**Point 8**

Refer to our response in Matter 3, point 4.

**Point 9 – Flooding/Sewerage Issues (WSP)**

Proposed development at Lofts Farm presented advantages in terms of a foul sewage infrastructure solution over the proposed garden suburbs at Heybridge and Maldon, given that it is located in a position geographically closer and at a higher elevation than the Sewage Treatment Works.

Development of the SMGS sites will require considerable investment in foul sewage infrastructure. Solutions will likely comprise either significant upgrade to existing infrastructure within Maldon & Heybridge or a lengthy diversion to the south and east through 3<sup>rd</sup> party land. Both of these schemes carry risks to delivery due to involvement of 3<sup>rd</sup> parties. Upgrading of existing infrastructure within Maldon and Heybridge will impose inconvenience on existing residents and increase the potential for combined sewer overflow (CSO) operation, impacting local water quality.

Similarly a foul sewage drainage solution for the NHGS sites will also require investment to increase the capacity of existing infrastructure within Heybridge. Coupled with the flood risk in this area of Heybridge the prospect of increased operation of CSOs is high.



Juxtaposed to these situations is the opportunity for a low impact solution to be realized through the Lofts Farm site. The Lofts Farm site is geographically the closest to the Maldon Sewage Treatment Works. It would provide a low cost route for sewage from sites S2d, S2e and S2f to be diverted around Heybridge decreasing the risk of the town centre CSO's operating and resulting in less disruption to the existing town. The foul sewerage solution via Lofts Farm could also provide further an additional route for foul sewerage from parts of Heybridge to be diverted to the Maldon Sewage Treatment Works.

Therefore, in terms of flooding and sewerage, it is clear that strategic development North of Heybridge on both sides of Broad Street Green Road presents opportunities to overcome know, significant sewerage constraints for environmental benefit through reduction of CSO operation and relief of an already at capacity system.

**Point 11**

Refer to our response in Matter 3, point 14.

**In relation to Heybridge Swifts (S2(h))**

**Point 1**

Heybridge Swifts Football club currently occupies a site immediately south of Scraley Road. The buildings and equipment are effectively 50 years old and are below the current FA standards. It is essential for the Club to relocate to a new site where it can provide enhanced facilities and improve the prospects of promotion to a higher league. In order to facilitate the relocation it is proposed to relocate to a new greenfield site at Drapers Farm off Goldhanger Road. The sale and redevelopment of the existing brownfield site is essential enabling development to facilitate the new Club. The redevelopment of the existing football ground is in effect a 'windfall' on previously developed land. The overall principles and broad level of agreement to the relocation has been agreed with both officers and members of MDC for some years, although there has been a delay in securing the Drapers Farm site. Unfortunately, due to the delay, the proposals have become incorporated into the draft Local Plan and the proposed housing on the existing ground has been included in Policy S2 for 100 dwellings and is shown on Figure 5B as a 'Strategic Allocation'. There is no specific reference to Heybridge Swifts in Policy S4, although paragraph 2.50 of the explanatory text states:

“Outside of the Garden Suburbs, development proposals in the Strategic Allocations will still be expected to be in compliance with the principles and overall requirement set out in Policy S4. However, the Council will not require a masterplan for these sites as they are significantly smaller size and are geographically separated from the Garden Suburb areas defined in the Proposals Maps”

This explanation begs the question as to why the Heybridge Swifts site should be subject to the requirements of Policy S4, rather than being treated as a standalone brownfield site for redevelopment. Furthermore, the site is at advanced stage of design and a full planning application linked to an application for the new Football Club site is imminent having been the subject of several pre-application meetings. Delivery will commence as soon as planning permission is granted, which is expected in the first half of 2015.

Consequently, in relation to the Heybridge Swifts site, the strategy of the Plan is not considered to be appropriate, justified, effective and soundly based. A site specific policy would rectify these short comings.



**Points 4 & 5**

As the development of Heybridge Swifts is a relatively small site comprising approximately 100 dwellings and it has all main utilities within or adjacent to the site, it is not dependent upon any major infrastructure, only relatively minor local improvements to the road network. Therefore, the whole c. 100 units can be delivered in the short term and within the first 5 years of the Plan. The site is not dependent on infrastructure reliant upon pooling arrangements and is 'self-sufficient'.

**Point 9**

There are no flooding or sewerage issues that relate to Heybridge Swifts although the new Football Club site is the subject of a Sequential Test

**Point 14**

A full planning application for Heybridge Swifts is imminent.