



Ref: P21090/MW

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Date: 05/11/2021

To whom it may concern

GTNP Consultation  
SPC  
Maldon District Council  
Princes Road  
Maldon CM9 5DL

Dear Sir/Madam,

**Re: Great Totham Neighbourhood Plan Regulation 16 Consultation**

Further to Maldon District Council's (MDC) current live Regulation 16 Consultation in relation to the Great Totham draft Neighbourhood Plan we wish to make the following comments.

**Policy GT01 – Spatial Strategy**

**Does the policy meet the basic conditions?**

**A. The Neighbourhood Plan has regard to national policies and advice contained in guidance issued by the Secretary of State (eg National Planning Policy Framework and Guidance).**

**B. The making of the Neighbourhood Plan contributes to the achievement of sustainable development.**

Having reviewed the Great Totham draft Neighbourhood Plan (2020-2035) Submission (Regulation 15) Version August 2021 in its entirety our view is that although Policy GT01 (Spatial Strategy) may meet the basic conditions it may not qualify for the added protection afforded by para 14 of the NPPF given its lack of specific housing allocations.

Great Totham's status as a larger village and position in the spatial strategy of Maldon District Council's (MDC) adopted Local Development Plan as well as its associated sustainability in being able to accommodate some future housing growth is another important factor here meaning that the provisions of para 14 are of particular importance in this instance.

We note that Policy GT01 sets out that development proposals to meet identified local housing needs on sites that are outside the settlement boundary will only be permitted if it can be demonstrated that no available and deliverable site exists within the settlement boundary, the site is well related to the settlement boundary, sharing a boundary on at least one side, the site does not breach an existing defensible boundary, e.g. where there is not already development on both sides, and the site does not provide for significantly more than the identified local housing need. However, with reference to paragraph 14 of the NPPF it is clear that, in order for such NP provisions to be given due weight in local decision-making they should be containing policies and allocations to meet its identified housing requirement (sub para b of para 14 of the NPPF).

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Para 14 is of particular relevance here given MDC's current and ongoing chronic lack of a 5-year housing land supply (approx. 3.6 years) and the NP's non-compliance with these provisions (para 14) may still leave the village vulnerable to unplanned new development when the NPPF's tilted balance is applied.

It is also important to mention that Maldon's adopted Local Plan requires all neighbourhood plans across the district to deliver at least 100 dwellings in aggregate with an allowance made for at least 300 'windfall' dwellings to be delivered between 2014 to 2029. Given Maldon's current housing land supply (approx. 3.6 years) and its need to undertake an early review of its Local Plan (currently ongoing) there is clearly now a chronic need to further boost housing growth throughout the district which in turn will put added pressure on Great Totham as a larger village with a greater level of sustainability.

Although the draft NP seeks to ensure that development is focused within the settlement development boundaries of Gt Totham it does recognise that there is a need for flexibility around the development of uses that would enhance Gt Totham's role as a Larger Village. Such flexibility is mainly to allow housing sites to come forward that can address local housing needs. The NP acknowledges that these are principally likely to be as Rural Exception Sites although the NP does not identify any such sites which comes back to an apparent lack of full compliance with para 14 of the NPPF.

Other points of relevance contained within the draft NP that are relevant here are that the NP recognises that some growth will be needed to ensure the village remains vibrant and sustainable adding that new development must be small in scale and appropriately designed to be in sympathy with the existing rural character and local environment. The NP also re-affirms that Great Totham has a sound village infrastructure with safe roads, good public transport, cycle routes and footpaths (including Public Rights of Way) connecting the village with other communities, commercial centres, providing ready access to employment and schools as well as recreational and social facilities within the village and outside.

Therefore, in our view and in order to qualify for the added protection afforded by para 14 should the NP be adopted it would appear that allocating some well-positioned land for appropriate housing growth to meet local identified needs would significantly improve the soundness of the NP in its current form and give the local community even greater control over where any future growth for the village should be located.

#### **Current Site Promotion Work in Great Totham – Land South of Hall Road (MDC ref: GTHS6)**

Once such location where it would appear that housing growth would be highly sustainable and compliant with the current provisions of GT01 is land south of Hall Road as depicted on the accompanying Site Location Plan.

This parcel of land is located directly adjacent to existing housing and the south-eastern extent of the village's development envelope and as such would be well-related to the settlement boundary, sharing a boundary on at least one side and not breaching an existing defensible boundary. This site would also not provide for significantly more than the identified local housing need taking into account the future housing needs of the district overall and Great Totham's level of sustainability generally. The site would be well-placed to enhance the vitality of the rural community and would provide a sustainable opportunity for the village to grow and thrive, especially where this will support local services including for villages nearby which again would closely align with key NPPF objectives (Rural housing, para 79 of the NPPF).

It is noted that a clear message from the community is that Great Totham is generally not a sustainable location for large-scale residential growth with any such growth being of a scale that can contribute towards addressing local housing needs but is of a high-quality design and layout which minimises its impact on the surrounding countryside and environment. This Hall Road site is considered sequentially preferable in meeting such longer-term need and contributing sustainably to future housing growth pressures in Great Totham and across the district as a whole.

