

RESPONSE TO AMENDMENTS TO MALDON LDP OCTOBER 2016

The crucial issue for Maldon and the LDP is that of **local capacity**. Objective assessment of local housing need, is hardly possible given the context of the London 'overspill'. For development viability the attractiveness/draw of Maldon is also dependent upon not overstepping capacity in any of its aspects; as with tourism, the attractiveness of a place will be part of the equation.

Elements of the local physical and social Infrastructure, are right on the limit of being severely over-burdened. The road infrastructure, for instance, is close to capacity even after projected (Plan) mitigation.

Given the saturation level of infrastructure it can be reasonably assumed that the (previously designated) reserve sites, or similar sites of similar numbers of projected housing around the main conurbations of Maldon and Burnham would produce serious deficiencies were they to be included.

EB107 Schedule of Main Modifications To address matters raised in the EIP
The status of 'Alternative Sites' within the Local Development Plan as revised is unclear and could prove problematic (see comment on EBA108C below)

EBA 108 Sustainability Appraisal Report Update following Inspector's Report
The adequacy of assessment of sustainability were questioned in the original hearing and amendments made to the reports leaves much as questionable. The Appendices EB108 A,B,C include tick box assumptions on diverse issues that are scantily considered, anomalous or contradictory (eg 'App A' judgments air quality, emissions, transport, social isolation, which are illogical when comparing the judgments of one particular site with another).

There is also misleading and possibly problematic use of the term "affordable housing", outside the definition given it by the NPPF.

EBA 108 C Alternative Site Assessment Tables

There is the option of having reserve sites confined to as many small alternative sites as possible, widely dispersed so that should they be added to not yet delivered but irrevocably allocated and permitted housing provision, the cumulative impact on infrastructure is minimized. There are some 35 or more towns and villages in the district, outside of the main areas of allocation.

For the same reason the former reserve sites should not be included within the Alternative Sites, if these are to be included in the Plan, unless it can be clearly demonstrating with solid evidence that their cumulative addition would not over-burden infrastructure.

2016_05_27_Reserve_sites_statement

Item 8. Monitor and Review

“Review affordable housing provision and S106/CIL requirements where appropriate to improve the deliverability of housing sites; and”

The review of ‘Affordable Housing’ provision or CIL requirements, where housing delivery has not met targets, is considered a very perilous policy and should be excluded.

2016_05_27_Allocations_and_detail_statement

“The Council considers that the principles set out in the masterplans are in accordance with policies in the LDP and are clearly cross referenced. The masterplans are presented for illustrative purposes and as a guide for developers. They do not preclude other design approaches if it can be demonstrated that this would deliver the vision and development principles set out in the LDP. “

Site specific Supplementary Plans are needed to be drawn more closely within the LDP which, at present, isn’t secure or definitive enough on matters of shape of new development whether in terms of infrastructure, or site context, or of mix and form new development. It might be noted, in passing, that there is a contradiction in not “precluding other design approaches” on the one hand but then putting resources into non-site-specific “Design Guides” (presumably such as is/was The Essex Design Guide) on the other hand.

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