



BY EMAIL

Our Ref: AM/13021/JC/Tofts 27-10-16

Mr Adrian Tofts
Strategic Planning Manager
Maldon District Council
Princes Road
Maldon
Essex CM9 5DL

27th October 2016

Dear Adrian

LDP Consultation September – October 2016

I write with regard to the current LDP Consultation which invites comments on the implications of the DCLG 2014-Based Household Projections for the Objectively Assessed Housing Needs of Maldon District; the Proposed Main Modifications to the Maldon District Local Development Plan and the Sustainability Appraisal Report Update and associated Appendices.

Andrew Martin – Planning has previously sent correspondence to the previous Inspector and Maldon District Council regarding the inadequacy of the original Sustainability Appraisal (SA) and the need for an Addendum to supplement the SA that clearly outlines why the LDP's allocations were selected and the reasons why the other reasonable alternatives were not chosen. This correspondence (dated 16th March 2015 and 30th March 2015) is appended to this letter for ease of reference. This SA update / addendum falls considerably short of what is required through the Strategic Environmental Assessment Directive and when compared with the practice in other authorities in the preparation of their Local Plans, which have gone on to be found sound on the basis of the robust evidence in the Sustainability Appraisal.

Moreover, we object to the proposed modifications to the housing proposals for the following reasons. Maldon District Council has increased the number of new homes proposed from 4,410 to 4,650 between 2014 and 2029. This results in an increase in the annual provision from 294 to 310. The Council aims to achieve the increase largely within the category "existing commitments and SHLAA sites". This category goes up from 400 to 741, with some 641 due to be delivered in the first five years of the plan. A large number of new homes are therefore unaccounted for and are in unknown locations and sites, in both this category and 'windfalls'. There is also potentially a significant element of double counting.

Furthermore, reference to the 'reserve sites' has now been removed from the LDP through the main modifications and replaced with a statement confirming that the Council will rely on





annual monitoring to indicate if there is a need to bring forward additional housing sites to meet the shortfall in delivery. It is not specified how the Council will action this review and how appropriate sites will be identified promptly to address the shortfall.

Both Garden Suburbs allocated as part of the LDP have been subject to outline planning applications. The Maldon Garden Suburb application achieved a resolution to grant at Committee on 4th June 2015; however the Section 106 Agreement is still yet to be completed and signed by all parties. The Heybridge Garden Suburb application is still pending a decision but is likely to entail similar lengthy complex Section 106 Agreement negotiations. Two of the other allocations at Wycke Hill are also subject of delays in respect of problems relating to reserved matters. In summary therefore, the Council is far from identifying a spatial strategy for growth that will deliver the number of homes it has identified as needed within the Plan period. An update to the five year housing land supply position (by the Council in August 2016) shows a 6 year supply, but this has been and will continue to be subject of criticism / challenge.

In view of the above, Andrew Martin – Planning reserves their right to a position at the table when the examination in public hearings reopen in January 2017.

Yours sincerely

