

14th Oct 2013



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Planning Policy.
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Our Ref: GAS/PMMDCREps

By email (policy@maldon.gov.uk) + post.

Dear Sirs,

Re: Primrose Meadow, Mundon Road, Maldon.

We write on behalf of the landowners to the above Essex County Council and Plume School. The owners have jointly promoted the site through the "call for sites process" with MDC.

Both parties are currently in general discussion for a joint promotion and marketing of the site subject to formal agreement and acceptance by both of appropriate terms. We write accordingly to submit representations to the Draft Local Plan issues for public consultation and would advise specifically;

Policy I3 – Primrose Meadow.

Both ECC and Plume School support the release of the site for development purposes based on the policy justification in support of the necessary infrastructure approval for the planned projected growth on population in wider planning terms. However materially it should also be recognised that this site also offers the opportunity to contribute to the required housing provision under the NPPF guidance and offers an opportunity to contribute a significant number of new residential units to the 5 year housing supply targets recommend by the NPPF in addition to generating investment into local infrastructure investment and improvements. If developed to sensible capacity the site could generate approx 120 -150 new dwellings.

A substantive amount of proposed residential expansion identified in wider policy terms is for "Garden Suburb" expansions to the North and South of Maldon on large sites requiring substantial infrastructure investments and therefore has the potential for long lead in for delivery to meet a critical planning need. The Primrose site is in a sustainable location, available and deliverable and can therefore make an immediate contribution to the local community in accordance with NPPF guidance and objectives on a recognised housing need.

Regards the policy I3 generally there is no need for specific need for criteria based assessment.

I3 (1) Development of this site for residential use purposes stands to be assessed against a general national planning policy background(NPPF) together with local planning policy criteria.

The requirement for a site specific planning brief is therefore a superfluous process that is not necessary to guide development of this site and should therefore be removed. A general policy assessment should be sufficient. If the proposed development is otherwise unacceptable but, development could be made acceptable, the most appropriate method is via planning conditions or obligation (Para 203 NPPF).

I3 (2). Again the use of this criteria is unduly prescriptive. It is not for planning policy to direct the investment of site sale receipts. The site in question is in multiple ownership with differing corporate responsibilities, objectives and aspirations and again we would refer you to Para 203 NPPF as the most appropriate route for local planning control.

I3 (3). Whilst the potential for a Planning Brief is recognised the requirement to retain 1.3 ha for amenity and green space is overly prescriptive on the evidence base available for the wider planning needs and specifically open space, amenity and green infrastructure assessments in the wider borough and Maldon Town specifically. There is simply no justification for this level of protection on the current evidence base. I3 (3) should therefore be removed from the policy statement to maintain flexibility and for the site to contribute more effectively, in accordance with NPPF and proposed policy H4, the Effective Use of Land.

I3 (4). This statement is superfluous as this states the obvious in planning law and is therefore unnecessary in planning terms.

Based on the above we would request that consideration is given, in policy terms, to the inclusion of the Primrose Meadow site into main policy S2 Strategic Growth, as a site specific strategic residential allocation for development purposes.

Policy S1

ECC and Plume support this policy based on its consistency with the NPPF and specifically, but not exclusively **S1 (2)** which seeks to deliver a sustainable growth and wider choice in the most sustainable locations which is at the heart of NPPF guidance (para14). Primrose Meadow is in an eminently sustainable location.

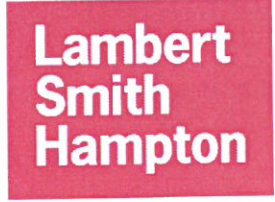
Policy S2

ECC and Plume support the general policy thrust for growth for a sustainable extension to residential provision in Maldon D C generally to a minimum of 4410 new dwellings and 1710 minimum for Maldon town specifically. They also consider the opportunity should be taken to maximise the potential for delivery in the area for sustainable locations able to add, immediately, to the supply of new dwellings in a choice of locations to widen the choice and availability of quality homes (Para 9 NPPF). That policy should retain flexibility to response to local circumstances to permit different opportunities to contribute to sustainable development (Para 10,NPPF). Accordingly we conclude that 294 dwellings per annum should be seen as the absolute minimum annual target in accord with Para 47 of the NPPF.

Further on evidence available there is currently a limited supply of deliverable new dwellings with demonstrably less than the required (NPPF Para 47) 5 year supply and heavy reliance on the proposed "Garden Suburb" allocations in S2 however meritorious for long term growth. A substantial housing backlog has been identified and with a 3 year historic delivery of only 120 units per annum against a policy proposal of 294 dwellings per annum targeted, there is an unquestioned need for sites readily available and deliverable in the short term to meet immediate targets under NPPF guidance.

The inclusion of Primrose Meadow as a site specific allocation for new dwellings would add to the strength and credibility of policy S2 as a site, immediately available, deliverable and in a sustainable location and in all respects NPPF compliant.

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Yours sincerely

Gary A Smith

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Agency & Development.
On behalf of Lambert Smith Hampton

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Draft Local Development Plan



Public Consultation Questionnaire

Following consultation on the preferred options last summer, Maldon District Council has prepared a Draft Local Development Plan (LDP) which will help shape the future of the District over the next 15 years. The Council now wants to hear what *YOU* think about the main proposals in the Draft LDP. Information is provided in the leaflet and copies of the Draft LDP, Proposals Map and Sustainability Appraisal, are all available online at www.maldon.gov.uk and at the Council Offices. A series of exhibitions will be held throughout the District in September.

Comments should be made by completing this questionnaire and returning it to the Council in the attached stamped addressed envelope.

If you prefer, you can complete the questionnaire online on the Maldon District Council website at www.maldon.gov.uk

All responses must be received by 5pm on Monday 14th October 2013
[late responses will not be considered]

PART A - Your details (*anonymous responses cannot be considered*)

[Please print clearly in all written responses using **BLOCK CAPITALS** and **BLACK INK** else your data may be lost]

Name	<input type="text" value="GARY SMITH"/>	Address	<input type="text" value="GROSVENOR HOUSE"/>
		Line 2	<input type="text" value="53 NEW LONDON RD"/>
Company (if applicable)	<input type="text" value="LAMBERT SMITH
HAMPTON"/>	Line 3	<input type="text" value="CHELMSFORD"/>
		Line 4	<input type="text" value="ESSEX"/>
Email address:	<input type="text" value="gxsmith@lsh.w.uk"/>	Postcode	<input type="text" value="CM2 0ND"/>

If you would like to be added to the Local Development Plan mailing list to receive updates on the progress of the Plan, please tick here (*please ensure your details are written clearly above*)



PART B -

Reference is made to the appropriate Policy/Appendix numbers in the Draft LDP.

Q1 The overall vision is to improve the quality of life for people living and working in the District and to provide the new homes, jobs and infrastructure required to meet identified needs and support the local economy, whilst protecting the District's heritage and environment.

Do you support the overall vision for the District set out in the Draft LDP?(please tick one box)

	<i>Strongly Agree</i>	<i>Agree</i>	<i>No Opinion</i>	<i>Disagree</i>	<i>Strongly Disagree</i>
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q2 In order to ensure the LDP will meet the requirements set by Government, the Council has reviewed the amount of development required to meet identified housing and employment needs over the next 15 years. As a result, it has been necessary to increase the proposed number of new homes from 3,000 to 4,410 and to allocate 8.4 hectares of additional employment land.

Do you support the proposed level of growth in the District (Policy S2)? (please tick one box)

	<i>Strongly Agree</i>	<i>Agree</i>	<i>No Opinion</i>	<i>Disagree</i>	<i>Strongly Disagree</i>
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q3 The main urban areas of Maldon, Heybridge and Burnham-on-Crouch are considered to be the most appropriate locations for new housing. Following consideration of alternative options which are detailed in the Draft LDP (Appendix 6), the following distribution is now proposed.

Do you support the proposed distribution of new housing (Policy S2)?

(please tick one box per line)

<i>Settlement</i>	<i>Total number of dwellings</i>	<i>Strongly Agree</i>	<i>Agree</i>	<i>No Opinion</i>	<i>Disagree</i>	<i>Strongly Disagree</i>
Maldon	1,830	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Heybridge	1,000	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Burnham-On-Crouch	450	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you disagree, is there an alternative distribution of new housing which you would prefer? [Please use **BLOCK CAPITALS]**

- Q4 It is proposed to develop two Garden Suburbs in Maldon and Heybridge which will be comprehensively planned to ensure the provision of a mix of housing, community and educational facilities, open space and new transport provision.

	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Do you agree with the proposals for development in Maldon and Heybridge (Policy S4)? (please tick one box)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- Q5 The distribution of new housing in Burnham-on-Crouch has been reviewed in response to comments received during the last consultation. It is now proposed to distribute the new housing between three smaller sites instead of one large site.

	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Do you support the strategy for housing development in Burnham-on-Crouch (Policy S6)? (please tick one box)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- Q6 In response to comments made during the last consultation, the number of new dwellings to be accommodated in North Fambridge has been reduced from 300 to 75.

	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Do you support the strategy for housing development in North Fambridge (Policy S7)? (please tick one box)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- Q7 In order to provide for local housing needs and support local services, it is proposed to make provision for a total of 345 new dwellings in other rural villages in the District. A Rural Allocations Development Plan Document will be produced after completion of the LDP in consultation with local communities to identify appropriate sites for development.

	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Do you support the strategy for housing development in other rural villages (Policy S7)? (please tick one box)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- Q8 A policy has been included in the Draft LDP to ensure that the use or display of advertisements do not have an adverse impact on amenity and public safety.

	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Do you agree with this approach (Policy D6)? (please tick one box)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- Q9 **The Draft LDP seeks to provide adequate land to promote employment development, job creation and to allow for the expansion of existing businesses.**

	<i>Strongly Agree</i>	<i>Agree</i>	<i>No Opinion</i>	<i>Disagree</i>	<i>Strongly Disagree</i>
Do you support the proposals for new employment development in Maldon and the extension to the Burnham Business Park (Policy E1)? <i>(please tick one box)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- Q10 **Increasing the supply of affordable housing is one of the Council's key priorities.**

	<i>Strongly Agree</i>	<i>Agree</i>	<i>No Opinion</i>	<i>Disagree</i>	<i>Strongly Disagree</i>
Do you agree with the local requirements for affordable housing provision (Policy H1)? <i>(please tick one box)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- Q11 **The Council is committed to working with our partners to improve healthcare facilities within the District**

	<i>Strongly Agree</i>	<i>Agree</i>	<i>No Opinion</i>	<i>Disagree</i>	<i>Strongly Disagree</i>
Do you support development on an appropriate greenfield location at the edge of Maldon if it were to deliver a new Community Hospital or similar healthcare facilities (Policy I2)? <i>(please tick one box)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- Q12 **Primrose Meadow is an area of green space situated off Mundon Road, Maldon**

	<i>Strongly Agree</i>	<i>Agree</i>	<i>No Opinion</i>	<i>Disagree</i>	<i>Strongly Disagree</i>
Do you support the production of a Primrose Meadow Planning Brief to manage the future use of the site (Policy I3)? <i>(please tick one box)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- Q13 **The Council has produced an updated Sustainability Appraisal to support the Draft LDP which is available on the Council's website. Do you have any comments on this? [Please use **BLOCK CAPITALS**]**

NO COMMENT

Q14 Do you wish to comment on the Proposals Map or any other Policies in the Draft LDP?

Please enter here which Policy Number / Paragraph number you refer to

I3

Please enter your comments in the box below [Please use **BLOCK** CAPITALS]

PLEASE ATTACHED REPRESENTATION LETTER.

Q15 If you wish to make any other comments on the Draft LDP, enter your comments in the box below [Please use **BLOCK** CAPITALS]

PLEASE SEE ATTACHED REPRESENTATION LETTER

Thank you for taking the time to complete this questionnaire. Your comments are important and will be fully considered. Please see Maldon District Council's website for future information about the progress of the LDP.

If you need further assistance please contact the Planning Policy Team by email at policy@maldon.gov.uk or by telephone on 01621 876202

This document can be made available on request in larger print, braille and audio and in languages other than English. To obtain a copy in an alternative format please contact the Planning Policy Team on 01621 876202.

Equality Monitoring

Maldon District Council is committed to providing services that meet the needs of its residents and to providing equal opportunity to all. In order to do this it is important that the Council understands who its customers are and who is using its services. The Council therefore asks for the following monitoring information.

Answering the questions below is entirely voluntary so please leave blank any questions that you are not comfortable answering. Any information you do give will be used to help us provide better services and to promote equality.

Information will only be used by Maldon District Council and its employees in accordance with the Data Protection Act 1998. Maldon District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

Information given will be kept separately so that individuals cannot be identified and will be treated as confidential and only used for the purposes described. Any personal details given will not be used for any other purpose.

Please tick appropriate box(es).

Q16 Are you

Male	<input type="checkbox"/>	Transgender /Transsexual	<input type="checkbox"/>
Female	<input type="checkbox"/>	Prefer not to say.	<input type="checkbox"/>

Q17 Are you

Heterosexual.....	<input type="checkbox"/>	Lesbian or gay ...	<input type="checkbox"/>
Bisexual	<input type="checkbox"/>	Prefer not to say.	<input type="checkbox"/>

Q18 Age Group

Under 16	<input type="checkbox"/>	45-64.....	<input type="checkbox"/>
17-24	<input type="checkbox"/>	65 and over.....	<input type="checkbox"/>
25-44.....	<input type="checkbox"/>	Prefer not to say.	<input type="checkbox"/>

Q19 Which of the following best describes your marital status?

Single	<input type="checkbox"/>	Divorced.....	<input type="checkbox"/>
Married.....	<input type="checkbox"/>	Partner or co-habiting	<input type="checkbox"/>
Civil Partnership.	<input type="checkbox"/>	Prefer not to say.	<input type="checkbox"/>
Widowed	<input type="checkbox"/>		

Q20 What is your religion?

Buddhist.....	<input type="checkbox"/>	Muslim.....	<input type="checkbox"/>
Christian (all denominations)	<input type="checkbox"/>	Sikh	<input type="checkbox"/>
Hindu.....	<input type="checkbox"/>	No religion or belief	<input type="checkbox"/>
Humanist.....	<input type="checkbox"/>	Other.....	<input type="checkbox"/>
Jewish.....	<input type="checkbox"/>	Prefer not to say.	<input type="checkbox"/>

Q21 Do you consider yourself to have a disability?

The Disability Discrimination Act 2005 defines a person as disabled if he or she has a physical or mental impairment which has a substantial long-term adverse effect on his or her ability to carry out normal day-to-day activities. This would include progressive illnesses such as cancer.

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>

Q22 What do you consider to be your ethnic origin?

White - British	<input type="checkbox"/>	Asian or Asian British - Bangladeshi	<input type="checkbox"/>
White - Irish	<input type="checkbox"/>	Asian or Asian British - Other.....	<input type="checkbox"/>
Mixed - White & Black Caribbean	<input type="checkbox"/>	Black or Black British - Caribbean.....	<input type="checkbox"/>
Mixed - White & Black African.....	<input type="checkbox"/>	Black or Black British - African.....	<input type="checkbox"/>
Mixed - White & Asian	<input type="checkbox"/>	Black or Black British - Other	<input type="checkbox"/>
Mixed - Other.....	<input type="checkbox"/>	Chinese	<input type="checkbox"/>
Asian or Asian British - Indian.....	<input type="checkbox"/>	Other (please specify in box below **).....	<input type="checkbox"/>
Asian or Asian British - Pakistani	<input type="checkbox"/>	Prefer not to say	<input type="checkbox"/>

** Other (please specify)