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COPY



Sir/Madam  
Maldon District Council  
Princes Road  
Maldon  
Essex  
CM9 5DL

**By email and post**  
Policy@maldon.gov.uk

14 October 2013

let.008.CW.19340001

**Indigo Planning Limited**

Swan Court  
Worple Road  
London  
SW19 4J5  
T 020 8805 9400  
F 020 8805 9401  
info@indigo-planning.com  
indigo-planning.com

Dear Sir/Madam

**DRINKWATER FARM, MALDON ROAD, BRADWELL-ON-SEA  
DRAFT LOCAL DEVELOPMENT PLAN 2014 -2029 PUBLIC  
CONSULTATION**

We write on behalf of our client, Coldunell Limited, in respect of Maldon District Council's (MDC) Draft Local Development Plan 2014 – 2029 consultation.

We welcome the opportunity to comment upon the policies and allocations set out in the Draft Local Development Plan. In particular, Coldunell Limited are keen to ensure that the policies and allocations contained in the document are flexible and realistic to assist in meeting the needs of the district.

This letter should be read in conjunction with the completed Draft Local Development Plan Response Form which is also enclosed.

We have previously submitted our client's site for inclusion in the SHLAA Call for Sites 2013. We enclose the SHLAA submission for ease of reference.

**Draft Local Development Plan 2014 - 2029 Consultation (August 2013)**

The Draft Local Development Plan (LDP) sets out MDC's proposed development strategy and site allocations. The document sets out MDC's housing requirements for the district and identifies the sites that it proposes to allocate to meet the identified housing targets.

**The Requirements of the National Planning Policy Framework**

The National Planning Policy Framework (NPPF) sets out clear advice on how Local Plans should be prepared. The following key statements from the NPPF provide the framework for how Council's should approach the preparation of Local Plans, particularly with reference to housing targets:

- Paragraph 47 confirms the need for local planning authorities to boost significantly the supply of housing by using their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market

Registered Office  
Swan Court  
Worple Road  
London SW19 4J5  
Registered number: 2070907

Directors:

- Simon Nisula  
BA (Hons) MRTP
- Philip Wilson  
BA (Hons) MRTP
- Ian Lacey  
BSc (Arch) RArch (Inst) FIBA FRIBA
- Matthew Manswaring  
BA (Hons) MRTP
- Scott McGee  
BA (Hons) MSc MRTP
- Tom Waring  
BA (Hons) MRTP
- Helen Greenough  
BA (Hons) DipTP MRTP
- Doug Hann  
BA (Hons) MRTP, MSc MRTP
- Mike Kersley  
FCA FCAI FCIIM FCIIM FCIIM FCIIM FCIIM

Consultants:

- John Spink  
BSc MRP (Hons) MRTP MRTP
- Ed Davison  
BA (Hons) DipTP (Dip) MRTP

Also in Manchester, Leeds and Dublin



and affordable housing in the housing market area, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

- Paragraph 151 states that Local Plans: “must be prepared with the objective of contributing to the achievement of sustainable development”. This includes ensuring that the Local Plan has a presumption in favour of sustainable development.
- Paragraph 154 identifies that Local Plans should be aspirational but realistic, and should set out opportunities for development.
- Paragraph 156 states that strategic priorities and policies within Local Plans should deliver the homes and jobs needed in an area.
- Paragraph 157 states that Local Plans should plan positively for the development and infrastructure required in an area.
- Paragraph 159 states that LPAs should ‘prepare a Strategic Housing Market Assessment (SHMA) and a Strategic Housing Land Availability Assessment (SHLAA) to identify and meet the housing need over the plan period’.

It is clear that the NPPF promotes the preparation of flexible and positive Local Plans, which respond to the needs of the particular area and which are based on a robust evidence bases.

In this regard, we have a number of concerns with the policies included within the current draft Local Development Plan (LDP). The fundamental issue relates to the ability of the LDP to meet the full, objectively assessed needs for market and affordable housing in Maldon District. Further, the allocation of the sites identified is insufficient to provide the flexibility required in the Local Plan to adapt to rapid change throughout its lifetime.

Our key concerns with the LDP, and our suggested amendments, are outlined below.

### **The Evidence Base**

As noted above, Paragraph 47 of the NPPF confirms that LPAs must base their Local Plan requirements on their evidence base. MDC’s evidence base, in respect of housing requirements, is set out in the Strategic Housing Market Assessment Update 2012 and the Annual Monitoring Report 2012 published in March 2013. Also of relevance is the LDP Sustainability Appraisal, Strategic Environmental Assessment and HRA Report 2013 which provides an assessment of the LDP policies against sustainability and environmental considerations.

### **Strategic Housing Market Assessment (SHMA) Update 2012**

The Strategic Housing Market Assessment (SHMA) Update 2012 sets out the



objectively assessed need for the district for the plan period up to 2029. The SHMA identifies that after re-let and re-sale supply, there is a net need, prior to new delivery, for 245 new affordable dwellings per annum based on dealing with a backlog in supply over 17 years (2012 – 2029). This requirement equates to 83% of the 294 dwellings a year proposed under Policy S2 'Strategic Growth' of the Draft LDP.

In terms of market housing, the SHMA identifies that the market sector shortfall is assessed at 580 units per year. Therefore the total need and demand for the district (affordable and market housing) which is not being met by stock flow equates to 825 units per annum, a total of 12,375 units over the 15 year life of the plan period.

The SHMA states that the majority of both need and demand should be met by the turnover of the existing housing stock, through under occupied properties becoming available and accommodating larger families or the elderly moving into sheltered accommodation and freeing up dwellings for newly forming households. However, the SHMA recognises that in Maldon District, this is clearly not being achieved.

The SHMA, and by consequence the LDP housing targets reliance on the high level of need being addressed by the turnover of existing housing stock is unreliable and does not constitute a sound approach to meeting the housing requirements of the district. This approach essentially relies upon factors that are, to a certain extent, out of the Council's control and does not provide the flexibility required by the NPPF to respond to change and to plan positively to meet the needs of the district's population.

Whilst it is accepted that the Council is not expected to translate housing need and demand into actual housing targets in its LDP (as these form only part of the evidence base and need to be balanced against other factors such as environmental constraints), the housing target proposed in the LDP of 294 dwellings per annum (4,410 in the plan period) equates to only 36% of the objectively assessed need for the district and should therefore be significantly increased.

### **Sustainability Appraisal, Strategic Environmental Assessment and HRA Report (2013)**

The LDP Sustainability Appraisal, Strategic Environmental Assessment and HRA Report (2013) provides no detailed assessment of a range of housing targets (i.e. 200dpa – 900dpa) in order to demonstrate that the proposed target of 294 per annum is the maximum target that can be applied without resulting in unacceptable environmental impacts.

### **Annual Monitoring Report 2012 (March 2013)**

The Annual Monitoring Report (AMR) 2012 (March 2013) sets out the Council's five year housing land supply for the period 2014 – 2019 along with the identification of sites that it considers will address the housing requirement for

the entire plan period (2014 – 2029).

In the absence of an up-to-date housing target, the AMR sets out an assessment of its housing supply against the 200dpa target as identified in the LDP Preferred Options (2012) for the purposes of calculating its five year supply. The Council has applied a 5% buffer, as required by the NPPF, resulting in an annual target of 210 dwellings and a five year target of 1,050. The AMR identifies that the Council has a supply of 340 dwellings made up of sites with planning permission. Six dwellings have been identified as being undeliverable and the Council has applied a non-implementation rate of 10% which reduces the supply to 300 dwellings. Based on this figure, the Council acknowledges that it currently has a 1.43 years supply of housing (300/210).

The Draft LDP sets out a housing requirement of 294 dwellings per annum which equates to a five year requirement of 1,470. The LDP identifies that its five year housing supply (2014 – 2019) will be made up of 300 existing commitments, 1,770 from strategic allocations and 110 units from windfalls. This equates to a total of 1,880 dwellings. Against the proposed target of 294 per annum this results in a 6.39 years supply. Allowing for a 5% buffer this reduces the supply to 6.08 years.

However, out of the 300 commitments, a total of 154 units are expected to be delivered between March 2011 and March 2014. Since the five year supply period for the plan will commence in April 2014 until March 2019, these 154 units cannot be relied upon and included within the five year supply calculations. Allowing for the six units that have been discounted minus the 10% non-implementation rate this reduces the existing supply that can be delivered in the five year period to 162 which reduces the five year supply to 5.9 years (5.64 years when a 5% buffer is applied).

Further, the Council has persistently under delivered against both the old East of England RSS and the extant Local Plan targets. In the event of persistent under delivery, the NPPF is clear that a 20% (rather than a 5% buffer) should be applied. If a 20% buffer is applied then the Council's five year supply position falls to 4.89 years.

The Council's supply is heavily reliant on the delivery of the strategic allocations including the new garden suburbs and other allocations at Maldon and Heybridge and allocations at Burnham-on-Crouch. To date, these proposed allocations do not benefit from planning permission and there is no certainty over their deliverability within the five year period at the rates of delivery that are set out in Policy S2 of the Draft LDP.

We therefore consider that the Council's five year supply is therefore likely to be significantly below the five years required by the NPPF and as such greater provision should be accounted for in the Draft LDP.

Against this evidence base we provide the following comments and recommendations on the Draft LDP Policies.



### **Draft Local Development Plan 2014 – 2029 (August 2013)**

Our response sets out a number of concerns with the spatial approach adopted by the Council, with specific reference to the quantum of housing proposed for the district which is below what the requirement should be, and the prescriptive nature of the key housing policies. We do not accept that the approach taken by the Council and the resultant LDP satisfies the “soundness” tests as required by the National Planning Policy Framework (NPPF) (March 2012).

#### **Policy S2 ‘Strategic Growth’**

Policy S2 sets out a target of 294 dwellings per annum (total of 4,410) for the plan period. As identified above, this is significantly below the 825 dwellings per annum identified in the SHMA that is required to meet the needs of the district.

In the absence of any clear evidence to demonstrate that a higher target cannot be accommodated in the district, we consider that the housing requirement should be significantly increased to meet the objectively assessed needs for the district.

The policy identifies that the majority of new strategic growth will be delivered through sustainable extensions to Maldon, Heybridge and Burnham-on-Crouch. In addition, a proportion of new development will be directed to the rural villages to support rural housing needs, local services and facilities and the rural economy. The policy is currently too prescriptive in that it identifies all the housing sites that are to come forward to meet the housing requirement for the entire plan period. It is heavily reliant on strategic allocations coming forward within the early part of the plan period which have no certainty or guarantee over their deliverability.

Although we accept the Council’s approach to focus development on sustainable urban extensions, other sites will also be needed to meet the identified housing need. The overall strategy embedded in Policy S2 (that the Council will prioritise the allocation of land to meet housing needs) fails to provide for a “deliverable” approach to housing land supply, relying upon theoretical urban potential from sites put forward in the SHLAA (which do not have any certainty over their deliverability).

Paragraph 49 of the NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the LPA cannot demonstrate a five year supply of deliverable housing sites.

As noted above, we consider that the supply of housing sites included within the five year supply presented by the Council in the AMR is not as robust as the policy suggests. Therefore, greater flexibility should be incorporated into the wording of the policy to support the delivery of housing to meet population growth.



We therefore recommend that the following paragraph is included in the wording of the policy to ensure that the council can plan for and maintain a deliverable supply of housing.

In addition to the allocations identified, additional permissions for new housing may be granted where it is demonstrated to the Council's satisfaction that a development proposal will be of benefit in addressing a shortfall in the district's five-year housing supply or delivering the Council's strategy for a specific settlement (particularly where allocated or permitted sites are failing to come forward as anticipated).

**Qu. 14: LDP Proposals Map**

The adopted Proposals Map allocates part of our client's site for mixed housing and employment (B1) use under policy E1. The LDP Proposals Map and draft LDP Policy E1, allocate a number of sites for employment use, however this designation has been removed from our client's site.

We consider that the site is suitable for both housing, and an element of employment (B1) use. We therefore recommend that the LDP Proposals Map and draft LDP Policy E1 are revised to include the allocation of housing, and employment use, across the whole of the site.

The principle of residential development has been accepted on the site, by virtue of planning permission (ref. 07/00842) for 12 houses. The Council has acknowledged that housing on this site will contribute to the five year supply as identified in the appendices to the AMR. In light of our concerns over the housing requirement and the ability of the Council to maintain a five year supply, we consider that this site represents an opportunity to provide additional market and affordable housing to assist the Council in meeting its targets.

We trust that the representations outlined above will be taken into consideration by the Council. If you wish to discuss any of the comments made in further detail please do not hesitate to contact my colleague Mathew Mainwaring, or me.

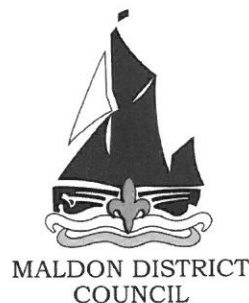
Yours faithfully

A handwritten signature in black ink that reads 'Caroline Wilberforce'.

Caroline Wilberforce

Enc: LDP Response Form; and  
SHLAA Site Form

# 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](http://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](http://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="CAROLINE WILBERFORCE"/>	Address	<input type="text" value="SWAN COURT"/>
		Line 2	<input type="text" value="11 WORPLE ROAD"/>
Company <i>(if applicable)</i>	<input type="text" value="INDIGO PLANNING"/>	Line 3	<input type="text" value="LONDON"/>
		Line 4	<input type="text"/>
Email address:	<input type="text" value="CAROLINE.WILBERFORCE@INDIGOPLANNING.COM"/>	Postcode	<input type="text" value="SW19 4JS"/>

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.**

	<i>Strongly Agree</i>	<i>Agree</i>	<i>No Opinion</i>	<i>Disagree</i>	<i>Strongly Disagree</i>
Do you support the overall vision for the District set out in the Draft LDP? <i>(please tick one box)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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.**

	<i>Strongly Agree</i>	<i>Agree</i>	<i>No Opinion</i>	<i>Disagree</i>	<i>Strongly Disagree</i>
Do you support the proposed level of growth in the District (Policy S2)? <i>(please tick one box)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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)?

<i>Settlement</i>	<i>Total number of dwellings</i>	<i>(please tick one box per line)</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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Heybridge	1,000	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Burnham-On-Crouch	450	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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**]**

PLEASE REFER TO COVERING LETTER

**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.**

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

	<i>Strongly Agree</i>	<i>Agree</i>	<i>No Opinion</i>	<i>Disagree</i>	<i>Strongly Disagree</i>
Do you support the strategy for housing development in Burnham-on-Crouch (Policy S6)? <i>(please tick one box)</i>	<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.**

	<i>Strongly Agree</i>	<i>Agree</i>	<i>No Opinion</i>	<i>Disagree</i>	<i>Strongly Disagree</i>
Do you support the strategy for housing development in North Fambridge (Policy S7)? <i>(please tick one box)</i>	<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.**

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

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

PLEASE REFER TO COVERING LETTER

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

POLICY E1  
AND PROPOSALS  
MAP

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

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

PLEASE REFER TO COVERING 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 REFER TO COVERING 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/>
Prefer not to say	<input type="checkbox"/>

### Q22 What do you consider to be your ethnic origin?

White - British .....	<input checked="" 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)

# Strategic Housing Land Availability Assessment

## Site Form

# MALDON DISTRICT COUNCIL

Princes Road  
Maldon  
Essex CM9 5DL

www.maldon.gov.uk



<b>Office Use Only</b>

Please complete and return this form by email to [policy@maldon.gov.uk](mailto:policy@maldon.gov.uk). The form must be accompanied by a map clearly showing the precise boundaries of the site in its entirety and please indicate the area of the site which may be suitable for housing (if this is less than the whole of the site). The Council will not be able to register the site without this information.

Please use a separate form for each site and complete the form to the best of your knowledge.

### Contact Details

Name and company (if relevant)	CAROLINE WILBERFORCE, INDIGO PLANNING			
Address	SWAN COURT 11 WORPLE ROAD LONDON SW19 4JS			
Telephone number	020 8605 9400			
Email	caroline.wilberforce@indigoplanning.com			
I am: (please indicate all that apply)	Landowner	<input type="checkbox"/>	Land Agent	<input type="checkbox"/>
	Planning Consultant	<input checked="" type="checkbox"/>	Developer	<input type="checkbox"/>
	Registered Social Landlord	<input type="checkbox"/>		
	Other (Please specify)	<input type="checkbox"/>		

### Site Details

Site address	DRINKWATER FARM MALDON ROAD BRADWELL ON SEA CM0 7HY
Site area (hectares)	4.2
Current use	FORMER MAGGOT FACTORY & FISH BAIT FARM

Grid reference	Easting : 598505		Northing: 205614	
Relevant planning history	<p>PLANNING PERMISSION FOR 6 LIVE/WORK UNITS GRANTED IN 2004 (FUL/MAL/03/00247).</p> <p>PLANNING PERMISSION FOR 12 HOUSES AND WORKSHOPS ALLOWED ON APPEAL IN 2008 (FUL/MAL/07/00842). THE PRE-COMMENCEMENT CONDITION WAS DISCHARGED AND A MATERIAL OPERATION WAS BEGUN BEFORE THE EXPIRY DATE. THE PERMISSION IS THEREFORE EXTANT.</p>			
Map enclosed clearly showing the site boundary	Yes	<input checked="" type="checkbox"/>		
Number of owners	1	<input checked="" type="checkbox"/>	2-3	4 or more
Please provide the owners details, if different from above	<p>COLDUNELL LIMITED  COLDUNELL HOUSE  DAWES COURT  ESHER  SURREY  KT10 9QD</p>			
<b>Proposed Use</b>				
Residential Capacity	UP TO 30 HOUSES			
Proposed Density	APPROX 7 DPH			
Other Proposed Uses	COMMERCIAL / B1 WORKSHOPS			

Are there any factors which might make the site unavailable for development?			
Ownership constraints and/or covenant constraints	NONE		
Awaiting relocation of current use	VACANT SITE		
Any other constraints (e.g. ransom strips, access issues, utility etc)	NONE		
Developer Interest (please indicate)	Owned by a developer	<input checked="" type="checkbox"/>	Enquiries received
	Under option to a developer	<input type="checkbox"/>	Not known
	Site is being marketed	<input type="checkbox"/>	Other
Is the site viable for residential or mixed use (including residential) development?	YES. PLANNING PERMISSION ALREADY EXISTS ON THE SITE AND THE OPPORTUNITY TO BRING FORWARD A HIGHER QUALITY DEVELOPMENT OF C. 26 UNITS IS BEING DISCUSSED WITH PLANNING SERVICES.		
Likely time frame for development	Within 5 years	<input checked="" type="checkbox"/>	
	6-10 years	<input type="checkbox"/>	
	11-15 years	<input type="checkbox"/>	
Are you aware of any issues or physical constraints that might make the site unsuitable for development? Please answer to the best of your knowledge.			
Environmental constraints (e.g. SSSI, Flood plain, European designation)	SPECIAL LANDSCAPE AREA		
Utility constraints (electricity, water, sewer, sewerage, gas, telephone, broadband etc)	OVERHEAD ELECTRICITY CABLES ACROSS SOUTH EAST CORNER OF SITE		
Other designations (e.g. Conservation area)	NONE		
Physical constraints (e.g. topography, Tree Protection Orders)	NONE		
Planning Policy constraints (e.g. employment site or located outside the existing development boundary)	OUTSIDE SETTLEMENT BOUNDARY. CURRENTLY ALLOCATED IN LOCAL PLAN FOR MIXED HOUSING AND B1 BUSINESS USE.		
Distance to local/town centre (km)	ADJACENT TO BRADWELL ON SEA AND TILLINGHAM		
Public transport frequency/availability	BUS SERVICE BETWEEN MALDON AND SOUTHMINSTER RUNS ALONG THE SITE FRONTAGE.		
Is there any other information regarding this site that it would be useful for us to be aware of?	THE SITE HAS PLANNING PERMISSION FOR 12 HOUSES AND WORKSHOPS (THE SCHEME WAS ALLOWED ON APPEAL IN 2008 - FUL/MAL/07/00842). THE PRE-COMMENCEMENT CONDITION WAS DISCHARGED AND A MATERIAL		

OPERATION WAS BEGUN BEFORE THE EXPIRY DATE. THE PERMISSION IS THEREFORE EXTANT. THE COUNCIL'S SHLAA DOCUMENT (DATED JULY 2012) ALSO IDENTIFIED THE SITE AS HAVING AN 'EXTANT PERMISSION'. A CERTIFICATE OF LAWFUL DEVELOPMENT IS BEING PREPARED.

THE EXTANT PERMISSION HAS A DENSITY OF 2.69 DPH; THIS IS SUBSTANTIALLY BELOW ANY RECOGNISED STANDARD FOR MAKING THE BEST AND MOST EFFICIENT USE OF LAND. WITH THE PRINCIPLE OF RESIDENTIAL ACCOMMODATION ALREADY ACCEPTED ON THIS SITE, THE NPPF REQUIRES THAT HOUSING SITES ARE MORE EFFICIENTLY PLANNED. THE HIGHER DENSITY IN THE PRE-APPLICATION SCHEME WOULD MAKE MORE EFFICIENT USE OF THE SITE, WHILST MAINTAINING THE OPEN FEEL OF THE SURROUNDING AREA BY RETAINING LARGE AMOUNTS OF OPEN GREEN SPACE, AMENITY SPACE AND WOODLAND WALKS.

THE COUNCIL'S FIVE YEAR HOUSING LAND SUPPLY STATEMENT (SEPTEMBER 2011) STATES THAT THERE IS ONLY A SUPPLY OF 3.54 YEARS. THIS SITE CAN MAKE A CONTRIBUTION TO DELIVERING THE COUNCIL'S REQUIREMENTS.

THE SITE IS:

**SUITABLE** – THE LEVEL AND CLEARED SITE BENEFITS FROM AN EXTANT PERMISSION FOR HOUSING AND THEREFORE THE PRINCIPLE OF HOUSING ON THIS SITE HAS ALREADY BEEN ACCEPTED.

**AVAILABLE** – THE SITE IS CONTROLLED BY ONE LANDOWNER WHO INTENDS TO DEVELOP IT OUT.

**ACHIEVABLE** – A 26 UNIT SCHEME WOULD BE A VIABLE PROSPECT IN THIS LOCATION.

**Thank you for taking the time to complete this form**



**Promap**  
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<b>Key</b> Site Boundary	<b>Project</b> Drinkwater Farm	<b>LPA</b> Maldon District Council	<b>Indigo Planning Limited</b> Swan Court Worple Road London SW19 4JS	
	<b>Title</b> Site location plan	<b>Date:</b> 26.09.13 <b>Scale:</b> 1:1250@A3 <b>Project No:</b> 19340001 <b>Drawing No:</b> 19340001.2 <b>Drawn By:</b> TH	<b>T</b> 020 8605 9400 <b>F</b> 020 8605 9401 <b>info@indigoplanning.com</b>	
	<b>Client</b> Coldunell Limited			