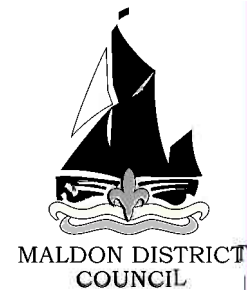


Draft Local Development Plan



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	NATHANIEL LICHFIELD & PARTNERS ON BEHALF OF DARTMOUTH PARK ESTATES	Address	14 REGENT'S WHARF
		Line 2	ALL SAINTS STREET
Company (if applicable)	NATHANIEL LICHFIELD & PARTNERS	Line 3	LONDON
		Line 4	
Email address:	SBUTTERWORTH@NLPLANNING.COM	Postcode	N1 9RL

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 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)?

(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 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]**

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 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.

	<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 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.

	<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 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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]**

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

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

PLEASE SEE 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	<input type="checkbox"/>
Female.....	<input type="checkbox"/>	/Transsexual	<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)

Planning Policy
Maldon District Council
Council Offices
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14 Regent's Wharf
All Saints Street
London N1 9RL

020 7837 4477
london@nlppanning.com

nlppanning.com

Date 14 October 2013
Our ref 07015/02/SB/NW/5668990v3
Your ref

Sent by post and email (policy@maldon.gov.uk)

Dear Sir or Madam

**Maldon District Council: Draft Local Development Plan 2014-2029 Consultation
Representations on behalf of Dartmouth Park Estates – Wycke Hill North Site, Maldon**

We write on behalf of our client, Dartmouth Park Estates Ltd (DPE), regarding the above consultation.

DPE has an agreement with Essex County Council, to promote its land interests covering c.20ha of land to the north and west of the A414, adjoining the group of buildings at Knowles Farm, South of Maldon. The site is identified as 'S2(b) - South of Maldon (Wycke Hill North)', forming part of the proposed 'New Garden Suburb at Maldon', a strategic growth area in the draft Local Development Plan (LDP).

DPE has promoted the south western expansion of Maldon town on its Wycke Hill (North) site for a number of years, to meet future land use development needs of the town, including responding to the Council's Call for Sites in August 2008, Core Strategy 2009 and Preferred Options 2012.

DPE has also been proactive on the emerging Maldon LDP, attending and contributing to the Local Developer Forum meetings and workshops. This has led to a Statement of Agreement (3 October 2013) being issued on the draft South of Maldon Strategic Masterplan Brief between DPE and those parties promoting sites S2(a) and S2(c)

Accordingly, DPE welcomes the proposed allocation of Site S2(b) for 450 residential units, to assist the Council to address its requirement for substantial further dwellings and development needs in the District. DPE comments on the draft LDP in that context, in relation to its 'Wycke Hill North' site.



Local Development Plan

Policy S1 Sustainable Development

DPE supports this positive policy insofar as it is consistent with the NPPF in terms of achieving sustainable development across the District and, in particular, the priority given to the planned growth at the Maldon Garden Suburb allocation.

One area where the policy S1 (principle 7) and objective 9 are inconsistent with the NPPF and LDP Policy D5 is flood risk. Policy S1 should clearly direct the strategic growth in the district to areas of lower flood risk wherever possible (i.e. FZ1). The LDP seems inconsistent in its application of this key policy area, one which is locally a very significant constraint in the district. This omission in Policy S1 should be addressed in a manner consistent with the NPPF (paras 99-108) NPPG.

Policy S2 Strategic Growth

DPE considers the housing requirement, now at 4,410 dwellings throughout the LDP period, or 294 dwellings per annum, remains too low (para 2.24), and that there has been recent underperformance in the delivery of new housing in Maldon district. There is:

- a significant gap between this SNPP new household formulation projections and the 825 units per annum SHMA figure indicating the current housing backlog and future need and supply (Draft LDP Technical Paper, Identification of Maldon District's Objectively Assessed Housing Needs, April 2003, Sections 4 & 5);
- a significant underperformance in the delivery of housing in Maldon district over the last 3 years against a low 120 units per annum annual average requirement (LDF AMR March 2013 p. 18); and
- currently, at 300 dwellings, currently only a 1.4 years supply of housing land over a 5 year period (AMR p18), equating to just a one year supply based on the proposed LDP annual housing requirement.

Furthermore, whilst we appreciate that Maldon DC has been co-operating with the Heart of Essex on relevant issues in accordance with the NPPF (paras 178 – 181), whether the Council has adequately discharged its duty to cooperate in respect of the provision of housing is unclear from the Evidence.

We therefore find that the 294 dwellings per annum requirement does not fully meet objectively assessed housing need in Maldon district. The persistent under delivery in recent years also necessitates that a 20% (rather than 5%) buffer is applied to the 5 years supply figure (NPPF, para 47). Furthermore, we suggest the LDP recognises that the identification of this housing requirement and the ability to satisfy it should be regularly reviewed.

DPE supports Strategic Growth Policy S2 and in particular the identification of the potential of the land South of Maldon for a sustainable extension to accommodate at least 1710 dwellings, as shown on Figure 3 (Maldon District Local Development Plan Key Diagram). We consider the opportunity should be taken to maximise housing delivery in this the most sustainable location for



significantly increasing housing in the District (consistent with Policy H4 on the effective use of land).

The allocation of land at Wycke Hill North for 450 new homes is supported, the actual number appropriate for the site being determined at the application stage having regard to the masterplanning framework at the time.

We consider that the phasing of development on site S2(b) should be amended, so that all 450 units are brought forward in years 0-5, in order to facilitate early delivery of the required relief road. Policy S2 should consider a more responsive and flexible approach towards the delivery of the proposed phasing from this viability perspective, to ensure the delivery and implementation of necessary infrastructure consistent with the approach in Policy I.1.

We support the Council's approach to the strategic growth (LDP para 2.25), concentrating on the District's settlements, particularly Maldon. It will, however, be important that the Garden Suburb concept (Policies S2, S3 and paras 2.39 - 2.42) does not undermine the urgent delivery of much needed new homes, given the current exceptionally limited housing land supply.

Policy S3 Place Shaping

DPE agrees with setting principles for sustainable, comprehensive and well-planned growth, to deliver high quality vibrant and distinctive neighbourhoods. However, there is also a tension between the landscape character principles (3 & 4) and the (appropriate) Policy H4 requirement to optimise the effective use of land.

We consider that the principles of successful placemaking should relate to the key strategic requirements for creating successful places and that detailed elements that overlap with the requirements of policy D1 and S4 should be deleted. Similarly, it is considered that the last paragraph of this policy (top of page 24) should be deleted and alternative text provided as part of policy S4 (see our comments on Policy S4 below).

Finally, we suggest that it is inappropriate to refer to a masterplan in the policy itself, rather than in its clarification, as we consider a strategic masterplanning framework to be a tool for achieving the Place Shaping principles in Maldon, as directed by Policy S3.

Policy S4 Maldon and Heybridge Strategic Growth

DPE strongly supports the Maldon Strategic Growth Area (SGA) and acknowledges that the South of Maldon Garden Suburb, in its entirety, will need to deliver the type of key infrastructure identified.

The Essex Highways report considered the traffic impact of development sites in Heybridge, South Maldon and Burnham-on-Crouch which would create a combined total of 3,150 dwellings. That report concluded (section 6.8, page 25) that the existing A414 Spital Road roundabout junction with the B1018 Limebrook Way would be over capacity and, as a result, suffer serious congestion with the addition of the proposed development traffic, without the provision of a new relief road, even with mitigation works to widen the approaches. It also concluded (section 6.8, page 25) that the relief road would be an essential mitigation measure as part of the District's strategic/growth to prevent congestion on the existing road network.



In relation to the South of Maldon Garden Suburb, there are three identified areas for housing contained within the draft LDP (i.e. Sites 2a, 2b and 2c, allocated for a total of 1710 dwellings). The housing allocation is now higher than that assessed by Essex Highways for the South Maldon development; this previously totalled 1,250 dwellings and is now 1,830 dwellings (i.e. 1,710 for Sites 2a, 2b and 2c combined, plus 120 dwellings on site 2 (f)). The capacity of the network will be tested using the traffic forecast for Heybridge/Maldon 2026 from the Essex Highways 'Assessment of Impact of proposed Development Sites in Heybridge, South Maldon and Burnham-on-Crouch on Highway Network' (AIPD) as the base.

DPE therefore appreciate that the need for the relief road is even greater than that envisaged in the 13 May 2013 Essex Highways report.

DPE accept the relief road proposal indicated through Site 2(b) Wycke Hill (North), as indicated on the Proposals Map, is essential to accommodating all the planned development envisaged at the Maldon and Heybridge Garden Suburbs and Strategic Allocations.

Nonetheless, there are some aspects the policy wording which we consider should be amended to:

- 1 Relate infrastructure requirements to demand arising from the development, as suggested (in the first bullet point on page 26) in the case of pupil demand. We are concerned that specifying the size of school and childcare facility in the policy is inconsistent with this approach. We suggest that the bullets are amended to read:
page 25, bullet 1 – *“A new primary school to meet demand arising from the development”*
page 25, bullet 2 – *“An early years and childcare facility to meet demand arising from the development”*.
- 2 The specific requirement for employment uses (page 25, bullet 5) should be deleted, as this is not a 'key infrastructure' item and is included in *Policy E1 Employment in any event*.
- 3 We assume reference to policy E2 should read E1 (at page 25, paragraph 3).
- 4 The wording of the housing requirement (at page 26, bullet 8) should be the same as that set out in Policy S3 Place Shaping (Principle II) – replace with the following *“provide dwellings which meet the District’s housing needs [including] for an older population, as identified and required by the Council”*.
- 5 Where *“adequate”* provision is to be provided we suggest that appropriate and proportionate would more clearly express them in that aid clarity.

We consider the last two paragraphs of Policy S4 and the last paragraph of Policy S3, referring to masterplanning should form part of Policy S4 and be reworded to give greater clarity and avoid undue burdens on bringing forward individual site allocations. In this respect, we note that there are distinct and separate land parcels at the proposed Maldon Garden Suburb and (from the Masterplanning Workshop) that a different approach is being considered in relation to the Maldon and Heybridge Garden Suburbs. A 'framework approach' is considered appropriate to the Maldon Garden Suburb, the policy should be clear that what the Council requires to be prepared for the Maldon Garden Suburb is a 'strategic masterplan framework'.

DPE considers that the aim of any strategic masterplan framework should be to define the key elements that are necessary for the comprehensive development of the area only. This includes the



distribution of the key land uses and strategic principles relating to access, linkages and green infrastructure. DPE considers that the most appropriate approach is for detailed masterplans/proposals to then be prepared for each land parcel that fit into this overall strategic framework. We are concerned that the timescale for Council endorsement of this masterplanning process is unclear and could frustrate early delivery of urgently needed and otherwise acceptable proposals.

We consider it entirely inappropriate to propose to effectively prevent development in Garden Suburbs until the Council has endorsed a Masterplan (LDP 2.42).

In view of the above we consider that the following wording should be used in relation to the South Maldon Garden Suburb:

“A strategic framework for masterplanning the Garden Suburb at Maldon will be prepared in partnership between the Council, relevant stakeholders, infrastructure providers and developer/landowners. The framework will establish the key principles relating to land use, distribution, access, linkages and the provision of green infrastructure.”

“Development proposals within either Maldon or Heybridge Garden Suburb areas will be assessed against the provisions of the Maldon strategic masterplan framework or Heybridge Masterplan respectively.”

Policy E1 Employment

It is noted that Policy E1 Employment and the Proposals Map identify 0.5 ha of land (E1 (p)) for new employment space at Wycke Hill (North). DPE considers this is an appropriate level of provision for this but is the maximum.

DPE considers there should be greater flexibility in the definition of employment use classes that are appropriate in this location, including uses other than those falling within the B use class, consistent with the LDP’s earlier treatment of ‘non-traditional employment sectors’ (LDP 4.1).

Policy H1 Affordable Housing

DPE continues to disagree with the Policy of a variable affordable housing requirement across the District which includes a fixed 40% requirement for Garden Suburbs and Strategic Allocations at Maldon and Heybridge. We maintain the view that a district wide target subject to viability on individual sites be applied to ensure that developments delivering affordable housing are viable and deliverable (NPPF paras 173-177). This will enable a far more accurate assessment of ‘*local conditions and variations in economic viability which are known to exist across the District*’. This particularly applies to the new Garden Suburbs given the burden of the key infrastructure, and other development costs required by Policy S4.

Furthermore, this level of affordable housing is proposed to be set separate from the Council establishing its CIL in 2014.

Accordingly, we consider there is insufficient basis for the Council to depart from its present district wide target of 30% affordable housing. Robust viability testing, taking account of all considerations is required before setting the appropriate level to ensure this is realistic and does not undermine the delivery of new housing.



Policy H4 Effective Use of Land

DPE supports policy H4 and, in particular, the need to optimise the use of land to enable sustainable growth and the delivery of housing.

Policy T2 Accessibility

DPE notes point (i) of this policy restricts developments to locations where there is physical and environmental capacity to accommodate the type and amount of traffic generated. The policy should be re-worded to recognise that the impact of developments can be mitigated.

We therefore continue to suggest that point (i) is rephrased as follows : *“Be located where there is physical and environmental capacity to accommodate the type and amount of traffic generated or locations where the impact can be suitably mitigated, taking account the cumulative impact of developments”*

Policy I1 Infrastructure and Services

DPE concurs that new development should be supported by an appropriate level of new infrastructure as required by this Policy. DPE recognises and supports the development proposals within the South of Maldon Garden Suburb and Strategic Allocation will be expected to contribute collectively and proportionately towards the necessary infrastructure requirements. However, DPE considers that the level of contribution must relate to the nature and proposed scale of development impacts to be CIL 122 compliant and to ensure it does not undermine its delivery.

In terms of strategic design and infrastructure requirements for the Garden Suburbs, DPE concurs with the need for collective and holistic approach. In this respect, DPE is liaising with relevant landowners/developers in the South Maldon Garden Suburb.

In terms of the level of local infrastructure requirements, this will be dictated by the nature and scale of proposed development and consultation with the infrastructure providers. It can be expected to be reflected in the masterplans for the individual sites at the development management stage.

DPE notes that Policy I1 (point 5) and paragraph 8.10, requires planning applications to take account of relevant business plans and programs produced by infrastructure providers to ensure that development does not prejudice the planned delivery of infrastructure improvements. The principle is supported on the proviso that the relevant up to date documentation from the infrastructure providers is available, transparent and robust.

Policy I2 Health and Wellbeing - new policy

DPE notes the introduction of new Health and Wellbeing Policy I2 to the Local Development Plan which aims to improve the District's wellbeing. DPE supports this policy in principle, given that new residential development will increase health service demands. However, we do object to a policy seeking to promote a Community Hospital and then to pre-determine *“appropriate greenfield locations”* on the edge of Maldon, in the absence of any evidence base on both the need, scale and locational criteria that ought to apply to the selection of a new site for a Community Hospital.



Nathaniel Lichfield
& Partners

Planning. Design. Economics.

We trust the above is self-explanatory but should you have any queries, please do not hesitate to contact us.

Yours faithfully

A handwritten signature in black ink that reads 'Steven Butterworth'.

Steven Butterworth

Director

Copy

Nick Mann Dartmouth Park Estates