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Maldon District Council  
Via e-mail

Dear Sir/Madam,

**Re: Draft Local Development Plan 2014 to 2029**

Thank you for consulting Braintree District Council on the above Plan. Braintree District Council is pleased to see that you are intending to meet your objectively assessed housing need but would like to make the following additional comments;

**Transport**

No transport assessment has been produced at present which shows the potential impact of the strategic developments proposed on the highway network beyond the district boundary. The level of growth required could have implications for the A12 and B1018 in particular as well as other routes through the District. It is also likely to have impacts on the railway stations at Hatfield Peverel and Witham in terms of commuter parking and general usage. We are also concerned about the impact of increased traffic on the settlements of Hatfield Peverel, Nounsley, Witham, Rivenhall, Rivenhall End, Kelvedon and Feering. All of these settlements are on or adjacent to the A12 and could be severally impacted by increased traffic without suitable mitigation measures being identified. We understand that Essex County Council is currently working with the Highways Agency to make an assessment of this impact and of the possible mitigation measures required, particularly in Hatfield Peverel. We look forward to working with Maldon DC and ECC on this, but as these studies are yet to be completed we can make no further comment on the traffic impacts of the Plan at this time. It is also noted that a viability assessment will be required to assess whether the proposed mitigation measures can be funded by the strategic allocations. It would be helpful to have this alongside the highways studies in order to get a realistic picture of what could be achieved.

**Policy S2 – Strategic Growth**

No justification has been provided for the proposed windfall allowance. Emerging guidance from CLG indicates that a windfall supply shouldn't be relied on in years 6 to 15. Whilst the proposed windfall works out at 22 dwellings per year over the 6 to 15 year period, this equates to 220 dwellings. Without this windfall allowance in years 6 to 15, further allocation/s may be

required.

**Policy S8 – Settlement Boundaries and the Countryside**

We note that you are intending to produce a Rural Allocation DPD. Braintree District Council would welcome the opportunity to comment on these proposals once drafted, particularly for the villages adjacent to the District.

**Policy H6 – Gypsy and Traveller provision.**

We object to the wording of this policy. Each local authority must make provision for its identified Gypsy and Traveller requirement through allocations or by providing a mechanism to allow sites to come forward through the planning system. As such you should remove the reference to “adjacent authorities” from the policy.

**Policy E1 – Employment**

The level of new job provision seems to be very low considering the level of housing growth proposed. Further employment allocation may be required in order to make the District’s proposed growth more sustainable and to help mitigate traffic generation. Also no indication is given to the likely number of jobs created by the proposed employment allocations.

**Policy E2 – Retail Provision**

The National Planning Policy Framework requires local authorities to meet the needs for retail, leisure, office and other main town centre uses in full. No reference as to what the identified retail requirement is for the District or how it would be provided appears to be included within the document.

No locally set threshold has been set, although this is not necessarily required as the default NPPF threshold can be applied. If there are concerns over the viability and vitality of existing town centres a lower threshold can be applied if justified by a robust and credible evidence base. The retail evidence base seems weak and in some cases out of date and would not be considered robust and credible.

I hope you find these comments useful and we look forward to commenting on the next draft plan. If you have any questions or require clarification, please contact me on the number listed above.

Yours sincerely,



Emma Goodings  
Interim Planning Policy Manager