

**CARTER  
JONAS**

The Property People

**Response to the Maldon District Council  
Local Development Plan Consultation  
August – October 2013**



**On behalf of Coopers Property Limited**

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## **Introduction**

Carter Jonas, on behalf of our clients, Coopers Property Limited ('Coopers') welcomes the opportunity to comment on the Maldon District Local Development Plan Draft. Our previous contribution towards this process has involved site promotion and comments made in respect of the Maldon District Local Development Plan, with reference to the redevelopment options on land at Downhall Yard, Bradwell-on-Sea. The Site is being promoted as a sustainable location for future housing growth.

The current consultation follows on from the preferred options consultation held in July 2012. The purpose of the public consultation on the Maldon District Local Development Plan Draft is to collate relevant views regarding the plan prior to its progression onto the pre-submission stage, particularly those comments in relation to the preferred spatial growth strategy and any other revised policy elements.

Comments have been made on behalf of our client, referencing the relevant policies of the draft Maldon District Local Development Plan document.

## **The Site & Proposed Development**

The Site is located on Downhall Road in Bradwell-on-Sea, a rural village situated approximately 14 miles east of Maldon, Essex. The settlement has characteristics that are typical to its wider surrounding context; large areas of agricultural land, supported by small villages and hamlets. The Site itself is approximately 0.6 hectares in size with vehicular and pedestrian accesses via Downhall Road. The Site was previously let to Flogas – a supplier of Liquid Petroleum Gas (LPG) – who used the land for the storage of bottled LPG. This use has since ceased with possession reverting back to Cooper Property Holdings. The Site contains a number of vacant agricultural storage buildings. Downhall Yard shares its northern and southern boundaries with the Down Hall Residential Home and a detached residential property respectively. Elsewhere, along Trusses Road to the west of the Site is a Sewage Pumping Station located adjacent to a ribbon development comprising approximately 10 dwellings. The Site is not considered to be at high risk of flooding, is not within Green Belt or designated for its landscape or ecological quality. The Site is not located within a designated Conservation Area, although towards the south east of the Site is a Grade II listed building – that is, a conservatory associated with, and in the grounds of, Down Hall. It is possible that given the

previous use of the site for the storage of LPG that the Site is subject to contamination. Access is likely to be taken off Down Hall Road, opposite the junction to Trusses Road. A site location plan is attached as Appendix 1 for reference.

Development within this location could provide a sustainable solution to the future growth requirements within Maldon District. This Site has the potential to meet local housing demand within Bradwell on Sea, with the effect of bringing back a currently redundant site into active use – redevelopment would allow for the local environment to be greatly enhanced. On the basis of sustainability, growth here would assist in maintaining the vitality and viability of the rural community, supporting existing facilities and potentially making new growth opportunities viable.

#### **POLICY S2 – STRATEGIC GROWTH**

Object – Proposed Amendment – The Local Development Plan Draft proposes for strategic growth to be centred at the District’s main settlements as these constitute the most suitable and accessible locations in the District. The document goes on to state the majority of growth will be delivered through sustainable extensions to Maldon, Heybridge and Burnham-on-Crouch in the form of Garden Suburbs and Strategic Allocations.

Maldon District must allocate land to provide space for housing growth for a minimum of 3,000 dwellings to cover the Local Plan period up to 2029. The presumption, in accordance with the National Planning Policy Framework, shall be for sustainable development. This therefore requires the Council to seek suitable and deliverable sites within those better served locations. However, as recognised by the, now obsolete, Regional East of England Plan, Maldon District Council is a predominantly rural and dispersed district, where most developments will result in out-commuting for employment and leisure opportunities. This part of the District attracts a number of visitors as well as providing employment opportunities within the industrial sector. In addition, Bradwell has been identified by the National Planning Statement for Nuclear Power Generation, as one of the potential sites to accommodate additional new nuclear provision, and this therefore should be borne in mind when considering housing allocation options in this area.

Factors such as an ageing population, steady in-migration into the District and changing demographics and household competition all conspire to mean there is an ever-present demand for housing in the area. As such, Maldon District Council have a duty to meet these housing needs on developments of various scales and in various localities, both to meet this demand and to ensure that the area remains economically active and does

not fall into decline, but instead makes maximum use, and takes greatest advantage, of its coastal location. The delivery of homes on Sites related to existing settlements such as Bradwell (and the associated marina development at Bradwell Waterside) are crucial to the future long term viability and success of rural communities. Larger-scale strategic sites often have much longer delivery timescales which ultimately result in short-term housing supply issues. Smaller-scale parcels of land such as this Site are likely to be released earlier in the plan period given that these Sites are usually less constrained by the delivery of large-scale infrastructure improvements, providing positive benefits to the housing supply position.

#### **POLICY S8 – SETTLEMENT BOUNDARIES AND THE COUNTRYSIDE**

Object – Proposed Amendment – As it exists, the draft Local Development Plan classifies Bradwell-on-Sea as a *Smaller Village*. This is despite the fact that Bradwell benefits from a number of combined services and facilities offered in conjunction with neighbouring village, Bradwell Waterside. We object against such a definition being applied to this settlement and consider that the Council have not given proper regard to the level of services available in this locality. The draft Local Development Plan defines *Larger Villages* as '*settlements with a limited range of services and opportunities for employment, retail and education. They serve a limited local catchment and contain a lower level of access to public transport*'. The amalgamation of Bradwell on Sea and Bradwell Waterside would easily meet the criteria of a *Larger Village*. Merging the two localities to form one combined settlement allocation within the settlement hierarchy for the District is common for Local Planning Authorities, particularly where there is a close spatial relationship and inter-reliability, as is the case in this instance. Regardless of whether the settlements are conjoined for policy reasons, it is considered that Bradwell on Sea would still meet the criteria of a *Larger Village* on its' own merit.

Bradwell on Sea is a well-served village, hosting a village hall, primary school, post office, community shop, Public House/restaurant, place of worship and public open space. Bradwell Waterside provides additional facilities including 2 Public House, an outdoor recreation centre and a marina. A number of bus routes pass directly along the Site, connecting Bradwell on Sea to Maldon, Burnham on Crouch, Tillingham and Chelmsford. In such sustainable locations such as this, it is essential that sufficient housing numbers are provided to permit those people with a local connection to remain in the area - supporting both the coastal/rural economies and helping to sustain the associated facilities. This is especially the case of those seasonal facilities at the waterside which may experience high demand in the summer months but which are heavily reliant on local support in the winter months.



## Summary

In summary, we advocate for revisions to be made to *Policy S2 – Strategic Growth* so as to recognise, and positively plan for, the varied housing needs of the population. In this way, housing growth should be dispersed more evenly across rural areas, accurately reflecting the spatial quality of the District. *Policy S8 – Settlement Boundaries and the Countryside* should be altered to include Bradwell on Sea as a higher tier settlement given the local significance of this area to serving local people’s needs. Sustainable growth here would assist in maintaining the vitality and viability of the rural community, support existing facilities and realistically enable the provision of additional services.

We support the principle of directing more growth towards the rural areas and particularly for development to be sited on previously developed land instead of greenfield land. Indeed, we hereby advocate that a sequential policy is introduced which encourages the implementation of the aforementioned.

