

# 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="MR TONY COLLINS"/>	Address	<input type="text" value="THE COURTYARD"/>
		Line 2	<input type="text" value="9A EAST STREET"/>
Company (if applicable)	<input type="text" value="COLLINS &amp; COWARD LTD"/>	Line 3	<input type="text" value="COGGESHALL"/>
		Line 4	<input type="text" value="ESSEX"/>
Email address:	<input type="text" value="TONY.COLLINS@COLLINSCOWARD.CO.UK"/>	Postcode	<input type="text" value="CO6 1SH"/>

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)

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

	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
	<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)

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

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

PLEASE SEE ATTACHED SUBMISSION.

**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.**

Do you agree with the proposals for development in Maldon and Heybridge (Policy S4)? *(please tick one box)*

Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
<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.**

Do you support the strategy for housing development in Burnham-on-Crouch (Policy S6)? *(please tick one box)*

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

Do you support the strategy for housing development in North Fambridge (Policy S7)? *(please tick one box)*

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

Do you support the strategy for housing development in other rural villages (Policy S7)? *(please tick one box)*

Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
<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.**

Do you agree with this approach (Policy D6)? *(please tick one box)*

Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
<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.**

	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Do you support the proposals for new employment development in Maldon and the extension to the Burnham Business Park (Policy E1)? (please tick one box)	<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.**

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

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

	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
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)? (please tick one box)	<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**

	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Do you support the production of a Primrose Meadow Planning Brief to manage the future use of the site (Policy I3)? (please tick one box)	<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 SEE ATTACHED SUBMISSION.

**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 SUBMISSION

**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 SUBMISSION

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](mailto: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.

## Representations to the Maldon Draft Local Plan 2013

### 1.0 Spatial Vision and Development

- 1.1 Draft policy S1 Sustainable Development at the second key principle seeks to meet local housing need. This is not the approach adopted in the NPPF. The Council should be planning for its “objectively assessed housing need” plus a 20% buffer to reflect its historic underperformance of housing delivery.
- 1.2 Maldon District Council has decided to plan for a minimum of 4,410 dwellings between 2014 and 2029 (294 per annum). This target figure is substantially below the real need for the district and that suggested by the Strategic Housing Market Assessment. The objective of focusing such growth (policy S2) as sustainable extensions to Maldon is welcomed. However, in choosing sites to deliver this housing, the Council has failed to identify all of the most suitable and sustainable sites. It has chosen sites to the south of Maldon extending into the open countryside which will require the development of complementary social infrastructure. Although these sites are sustainable there are others such as the land at London Road which should be identified in the Local Plan.
- 1.3 The site at London Road, Maldon lies on the urban edge within the boundary set by the A414 bypass. The site benefits from close proximity to existing facilities such as schools and shops. The site was identified under the Strategic Housing Land Availability Assessment as site 3399, which met all the criteria for immediate housing delivery. It is unclear why this site has not been identified for housing in the Draft local Plan.
- 1.4 Therefore, it is proposed that the site be inserted into Policy S2 as follows:

Ref	Source of Supply	Total	Year 0-5	Year 5-10	Year 11-15
S2	Land at London Road, Maldon	70	70	N/A	N/A

- 1.5 In respect of the five year supply of housing the Council’s annual monitoring reviews and appeal decisions clearly indicate a significant under performance and accordingly the buffer should be increased to 20%. The NPPF at paragraph 47 confirms that in such circumstances of under-delivery of housing the higher buffer must be applied.

### 2.0 Design and Climate Change

- 2.1 Policy D3 “Conservation and Heritage Assets” goes beyond the requirements on the NPPF in that there is no requirement to preserve or enhance non-designated heritage assets. In fact, the whole of draft Policy D3 needs to be redrafted to reflect the proper assessment required under the NPPF.
- 2.2 Policy D4 needs to have the words “**adverse impact**” in the second paragraph replaced with “**significant material adverse impact**”. Otherwise any impact, however small, would justify a refusal of planning permission. The test as set out in the draft policy does not comply with the NPPF.

### **3.0 Housing**

3.1 Policy H1 seeks affordable housing targets which are unrealistic in terms of market delivery. With the imposition of CIL in due course the targets will make development impossible to deliver or each and every application will require viability testing. This is not the approach as advocated in the NPPF. It is this unrealistic approach that has resulted in significant under delivery of affordable housing across the District in the past. The target for the district as a whole should be no more than 30%.

3.2 At policy H2 the words “**local housing**” should be replaced with just “**housing**” in the first paragraph.

### **4.0 Infrastructure and Services**

4.1 The relationship between Section 106 contributions and Community Infrastructure Levy needs clarifying so that there is no double counting and charging for development. This will only exacerbate viability of projects without such clarity.

### **5.0 Site Allocation SN07 and Proposals Map**

5.1 The draft Proposals Map identifies the London Road site at reference SN07 as a “**Natural and Semi-Natural Open Space**” which are considered important areas of habitat, green linkages and amenity. In the case of SN07 an ecology report has been submitted to the Council in the previous public consultation on the emerging plan to show the site has no value for ecology purposes. The site is private and therefore of no amenity value and does not form part of any green link. It is in a single ownership, unconstrained and deliverable now. It would appear that Council has not taken account of the previous submissions and evidence to the draft local plan in formulating its Proposals Map for the site. Accordingly, it is incorrectly designated irrespective of its suitability for housing purposes.

5.2 It is asserted by the site owner and developer that the site shown as SN07 be reallocated for housing development on the Proposals Map and the Local Plan.

### **6.0 Soundness of the Local Plan**

6.1 Paragraph 182 of the NPPF identifies that the Inspector will in due course need to test the soundness of the Maldon Local Plan. At present the draft Plan is not sound because it fails to be fully justified in its approach to housing provision and is not consistent with the NPPF, particularly, Paragraph 159.