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Our Ref: JF 141013

14th October 2013

Dear Sirs

Maldon District Council Draft Local Development Plan Consultation (August - October 2013)

On behalf of Mr J O Parker and others I am writing to submit the following representation in response to the above named consultation. We have previously put forward our client's land holdings as part of the Council's Regulation 25 Core Strategy consultation in June 2009, and the Local Development Plan Preferred Options Consultation in August 2012. The land holdings are also identified in the Council's Strategic Housing Land Availability Assessment (SHLAA) and the relevant plan extract is attached to this representation. The SHLAA identification numbers for the land holdings are 3533i and 4444a and concern land at Bradwell-on-Sea.

The representation sets out responses to the consultation questions that we believe are most relevant to our client's land holdings including the areas in which we consider changes are required to the current proposed wording of the Draft Local Development Plan.

Consultation Question 2 –

Do you support the proposed level of growth in the District (Policy S2)?

The Council's intention to provide for a minimum of 4,410 dwellings (294 per annum) is supported. It is noted that this proposed level of growth is intended to meet the objectively assessed housing needs for the district.

The clarification within Policy S2 that this is a minimum number is particularly welcomed. We consider that this is consistent with the presumption in favour of sustainable development and will allow for small sustainable sites, such as our clients land at Bradwell-on-Sea to come forward as appropriate.

Consultation Question 7 –

Do you support the strategy for housing development in other rural villages (Policy S7)?

The strategy for development in rural villages is generally supported. We do, however, consider that a number of amendments to this policy wording are required in order to ensure the wording is fully

consistent with national planning policy and allows for sustainable rural developments.

We consider that the amendments to the wording of Policy S7 are required in order to make clear that these rural allocations are minimum numbers. This would be consistent with Policy S2.

The wording of Policy S7 should be amended to state:

“A Rural Allocations DPD will be produced to allocate land for a minimum of 420 dwellings in and around the District’s villages, comprising **a minimum of 75 dwellings** at North Fambridge and **a minimum of 345 dwellings** in other rural villages.”

This change to the policy wording is consistent with the rest of the Local Plan and with the presumption in favour of sustainable development.

We also consider that amendments are needed to the principles section of Policy S7:

“Each Parish will be invited to work with the Council to **promote sustainable development in rural areas**, identify appropriate land to meet the needs for their area, **boost the supply of housing in the district and locate housing where it will enhance or maintain the vitality of rural communities**.

Land will be allocated in the Rural Allocations DPD in accordance with the principles of sustainable development set out within the LDP and the following principles:

- a) Allocations will be of a scale that reflects the size and character of the village concerned, its position within the settlement hierarchy, its level of **local employment and** service provision, and availability of, or potential for, sustainable transport choices. **The scale of allocations will also seek to enhance and/or maintain the vitality of rural communities.**
- b) Allocations must be acceptable within the infrastructure capacity of the settlement concerned, or should be **able to satisfactorily address any infrastructure constraints through the use of planning conditions and/or planning obligations either individually or in combination with other sites.** ~~of a sufficient scale to enable the delivery of strategic infrastructure projects required to support future growth of the District,~~
- c) Allocations will **seek to** protect and, where possible, enhance ~~the~~ character and settlement distinctiveness,

- d) **Where appropriate** Allocations will contribute towards meeting the District's housing need for the older population
- e) Allocations will contribute towards meeting the District's affordable housing need **whilst giving consideration to the need for development to remain viable and deliverable.**

Existing community led plans including Neighbourhood Plans, Village Design Statements (VDS) and where appropriate Parish Plans, will inform the production of the Rural Allocations DPD **where these are in general conformity with the strategic policies of the Local Plan.**

Neighbourhood Plans and the Community Right to Build also provide an opportunity for local communities to bring forward additional development on sites not allocated within the Rural Allocations DPD."

We consider that the changes above are necessary to ensure the emerging Local Plan is consistent with the National Planning Policy Framework and can be considered to be 'sound' at future public examination.

The changes would in particular recognise the support in national planning policy for development that enhances or maintains the vitality of rural communities and the important contribution that relatively small levels of additional rural housing can make to meeting local housing needs and allowing local people to find housing within their local village. Changes to the first section of the policy and to criterion (a) are required in this regard.

The change to criterion b) is required in order to reflect the correct tests in terms of national planning policy and ensure that development can proceed if any impacts can be acceptably mitigated.

Criterion c) is suggested to state seek to given that any development will inevitably result in some changes to local character be that positive or negative.

Whilst all housing will provide additional options for older people, it is suggested that specific housing targeted at older people may not be appropriate on every site. Examples of this may be where the local community or parish council have identified a particular local need for large family housing or for starter units, or where planning constraints mean the site is especially suited to a particular type of housing.

It is considered necessary to amend criterion (e) to make that the NPPF requires planning to ensure that developments remain viable and deliverable.

Changes to the wording at the end of the policy are required to clarify the role of Neighbourhood Plans, Village Design Statements (VDS) and Parish Plans and the requirements of national planning policy.

Consultation Question 14 –

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

We consider that a comprehensive settlement boundary review should be undertaken at the earliest opportunity as we set out in our August 2012 representations on the previous Preferred Options consultation. This will identify opportunities for sustainable development in the District and ensure that the Proposals Map is up-to-date and fit for purpose. We therefore consider that a full review of settlement boundaries and site allocations within villages should be undertaken at the earliest opportunity.

Land at Bradwell-on-Sea

Whilst we recognise that detailed site allocations will be considered as part of the future Rural Allocations DPD we would highlight our client's land interests at Bradwell-on-Sea as a particular example of the type of sustainable sites that we consider can be brought in the District.

Bradwell is currently considered within the settlement hierarchy to be a smaller settlement however it includes the power station, which is a large employment generator locally, a church, a primary school, a sailing and outdoor leisure club, two public houses with restaurants and village hall. Train stations are available at Althorne, South Woodham Ferrers and Southminster. The site itself is well located with the services available being within walking distance of the site and local bus services also in close proximity making this a sustainable location for an infill development.

Site 4444a is located in the centre of the village. On its western boundary the site adjoins residential development at Kingswood Court and to the east the existing residential development along the frontage of East End Road. The site therefore represents a particular logical and sustainable addition to the village to help enhance vitality and meet local needs. The SHLAA (2012) recognises that the site is suitable, available for development and deliverable.

The site is currently agricultural land that would form a logical infill site within the village.

Our client's land interests also include site 3533i which we also consider could represent a sustainable addition to the village. The SHLAA considers this site particularly favourably noting that it is suitable, available, and deliverable and that there are no major constraints.

We consider that these sites represent sustainable opportunities for additional development which should be considered through the Rural Allocations DPD. In the event that both sites are not required at this stage it is considered that one site could be brought forward through joint working with the

Council with the other potentially identified for later development should it be required to meet local needs.

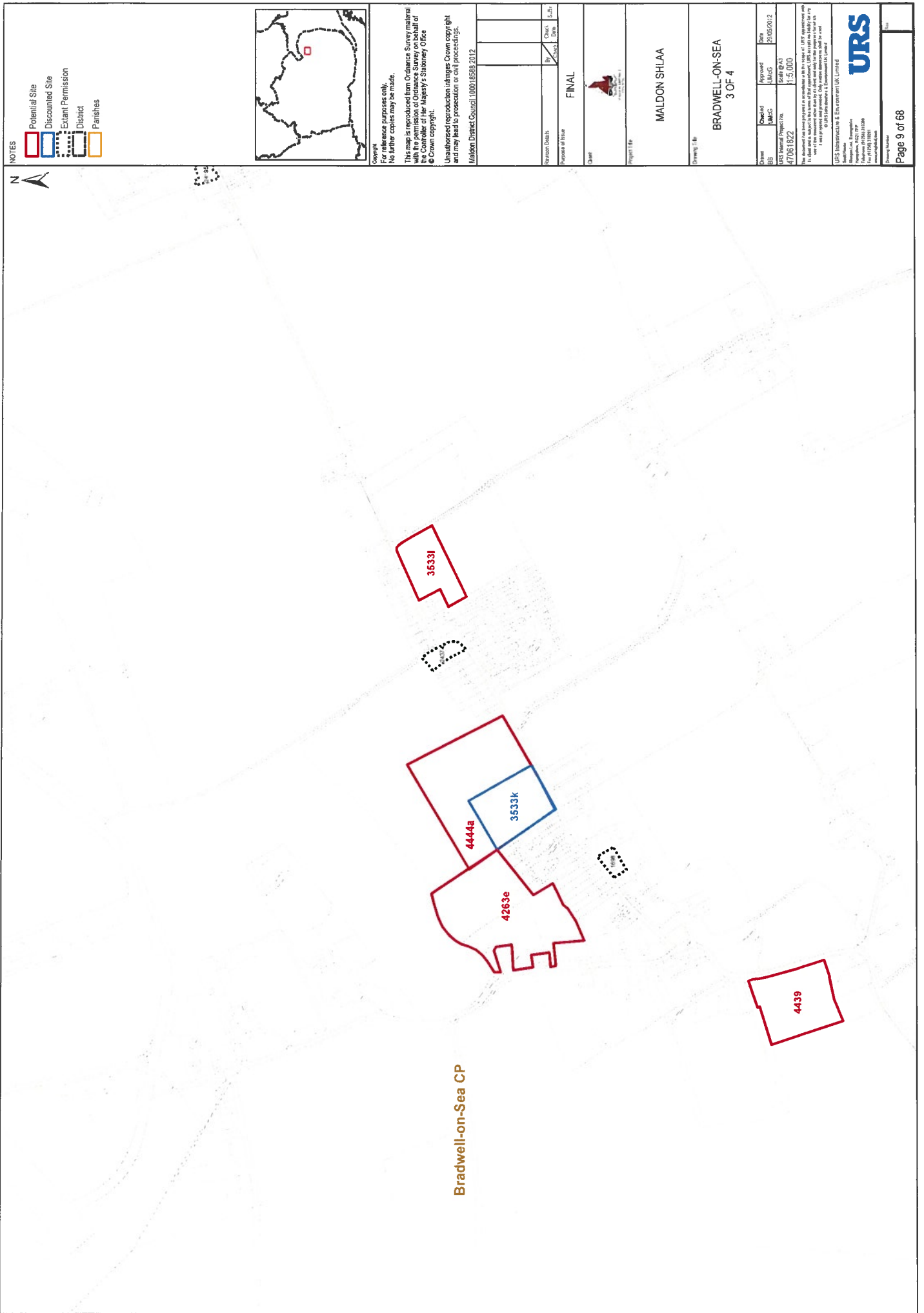
I hope that the above is of assistance and would request that you contact me with any questions regarding the above representation.

Yours faithfully

A handwritten signature in black ink, appearing to read 'J Firth'.

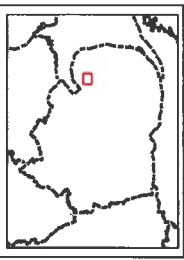
James Firth MSc MRTPI
Senior Planner

Enc SHLAA sites plan Bradwell-on-Sea



NOTES

- Potential Site
- Discounted Site
- Exempt Permission
- District
- Parishes



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Maldon District Council, 100018568, 2012

Revision Details	By	Check By	Issue Date

Purpose of Issue
FINAL



Client
MALDON SHLAA

Project Ref
**BRADWELL-ON-SEA
 3 OF 4**

Drawn	Checked	Approved	Date
BB	UM/SG	UM/SG	29/05/2012

URS Internal Project No. 47061822
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