

Planning Policy
Maldon District Council
Council Offices
Princes Road
Maldon
Essex
CM9 5DL

14 October 2013

BY POST & EMAIL

Dear Sirs,

DRAFT MALDON DISTRICT LOCAL DEVELOPMENT PLAN

We are writing on behalf of EA Strategic Land LLP (EA Strategic) in response to the consultation on the draft Maldon Local Development Plan (LDP). EA Strategic has an interest in land at North Fambridge, and is working with neighbouring landowners and stakeholders to bring proposals forward for development through the plan process.

a. Local Development Plan Overall Strategy

EA Strategic attended the community consultation event in relation to the draft LDP on Friday 27th September at North Fambridge Village Hall.

EA Strategic supports the intention of the Council in seeking to bring forward a local plan to address the requirements of the National Planning Policy Framework (NPPF). The implications of not having an up-to-date plan can be significant. It would result in uncertainty regarding the ability of the Council to accommodate the growth it needs and make it difficult to defend inappropriate development in the District.

In our view, there is a sequential process that the Council needs to follow: firstly, the objective development needs of the District should be determined, which requires the completion of the Strategic Housing Market Assessment (SHMA). Secondly, a view should be taken on whether, through the duty to cooperate, some of this need can be met in adjoining districts. Thirdly, through a combination of associated evidence, including an analysis of infrastructure capacity, landscape assessment and land quality and sustainability appraisal, a balanced approach should be taken to the relative merits of meeting the development needs versus the potential impact on the character and quality of the District. Only at that stage can the draft LDP confidently and robustly promote options for growth.

It is significant that the SHMA update in 2013 identified an overall total demand for market and affordable housing significantly in excess of historic targets and those identified within the draft LDP. Whilst the figures for overall total demand include those anticipated to be met by turnover of existing stock, the Council should allow sufficient flexibility in the wording of its policies to respond quickly to accommodate demand and recognise that the level of growth presently proposed is likely to be the minimum necessary to accommodate local needs. It is also significant that the Roger Tym report considered a range of constrained scenarios and concluded that across the Heart of Essex area as a whole these scenarios would result in a shortfall of some 600 units per annum that would need to be provided elsewhere.

b. Policy S2 – Strategic Growth

Policy S2 of the draft LDP states the requirement to accommodate 4,410 new dwellings in the period 2014 – 2029, which equates to 294 per annum. It goes on to state:

The majority of new strategic growth will be delivered through sustainable extensions to Maldon, Heybridge and Burnham-on-Crouch in the form of Garden Suburbs and Strategic Allocations.

The scale, type, uses and form of development will reflect their role as employment, retail and service centres, their level of accessibility, and environmental and infrastructure constraints.

In this context, it is significant that paragraph 2.82 of the draft LDP confirms that the minimum 420 new home allocation to the villages is proposed to secure their long-term sustainability and paragraph 2.83 confirms that North Fambridge “is one of the more sustainable rural villages given its proximity to a higher level of services within the neighbouring settlement of South Woodham Ferrers, its accessibility by rail and its proximity to a variety of employment and retail markets in South Essex.

c. North Fambridge Opportunity Location

The preferred options LDP preferred Policy S2 stated that development will be focused in the most suitable and accessible locations. It subsequently identified North Fambridge as a strategic growth location, and set out an allocation of 300 homes, to include a mix of uses to support the needs of the local community. Specific other infrastructure projects were also established in the draft document. From this, it can be ascertained that North Fambridge is considered by the Council to comprise a sustainable location capable of accommodating at least 300 homes.

Within the preferred options LDP, preferred Policy 3 confirms that the strategic growth area at North Fambridge would be planned as a high quality, vibrant and distinctive ‘garden suburb’. It is also noted that the Council did not consider there to be reasonable alternative to preferred Policy S3.

Draft LDP Policy S2 sets out the proposal for 75 homes to be delivered within North Fambridge, which has been reduced from the preferred options draft proposed allocation of 300 homes. The draft LDP Sustainability Appraisal states that the exclusion of North Fambridge as a ‘garden suburb location’ is a broadly positive impact and is in line with the majority of the Sustainability Appraisal objectives, however the Growth Capacity Testing Assessment in Appendix D appears to show that there would be an overall positive impact of additional housing at the settlement.

The draft LDP contains no clear evidence, or justification for the reduction in the proposed allocation from 300 to 75 homes in North Fambridge. To the contrary, previous iterations of the plan and the draft LDP Sustainability Appraisal appear to confirm that a larger allocation at North Fambridge would be beneficial.

d. Policy S7 - Prosperous Rural Communities

EA Strategic considers that the sustainability of the settlement of North Fambridge should mean it remains the focus for a larger proportion of growth to the 75 currently identified in the draft LDP. Equally, Policy S7 should confirm that the distribution of housing to the other villages should not preclude the identification of additional development within North Fambridge.

e. Conclusions

EA Strategic supports the efforts by the Council to provide an up-to-date local plan yet remain concerned that the justification for the overall housing target and, in particular, the distribution of the target to the other villages requires further justification. Fundamentally, the housing requirements identified in the SHMA should be accommodated in full.

EA Strategic considers that North Fambridge is not simply a housing allocation, but has the credentials to be comprehensively planned as a “garden suburb” strategic growth location as set out in the preferred options LDP. There is no justification as to why the allocation for North Fambridge has been reduced from 300 to 75. The settlement is capable of providing for an increasing population both through additional housing, and also the associated infrastructure and services required to benefit the amenity of existing and future residents. The Sustainability Appraisal confirms that overall, additional development within the settlement would be beneficial.

In our view, the LDP should review the distribution of housing in the District, and direct growth towards sustainable locations such as North Fambridge. It should also either allocate a far larger level of housing at North Fambridge by identifying it as a garden suburb through a revision to Policy S2, or allow for greater flexibility for an increased capacity at North Fambridge through revisions to Policy S2 and S7. This would enable the Council to more readily meet its Borough-wide housing need.

Thank you once again for the opportunity to respond to the draft LDP consultation. We would be very grateful for confirmation that these representations have been received.

Yours sincerely,

David Churchill
DIRECTOR

cc. David Kavanagh – EA Strategic