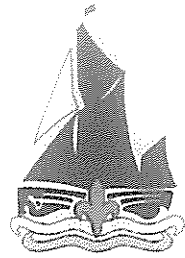


Draft Local Development Plan



MALDON DISTRICT COUNCIL

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 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

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	MR EDWARD GITTINS ON BEHALF OF MR. MALCOLM PAYNE	Address	UNIT 5 PATCHES YARD
		Line 2	CAVENDISH LANE
Company (if applicable)	EDWARD GITTINS & ASSOCIATES LIMITED	Line 3	GLEMSFORD, SUDBURY
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Email address:	info@egaplanning.com	Postcode	CO10 7PZ

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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
Heybridge	1,000	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Burnham-On-Crouch	450	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

PLEASE SEE ATTACHED REPRESENTATIONS REF. MFZ

~~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 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 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 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 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 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 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 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 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]

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

POLICIES SZ+SS
+ PARAS. 2-11-2-36

Please enter your comments in the box below [Please use **BLOCK CAPITALS**]

PLEASE SEE ATTACHED REPRESENTATIONS REF. MFZ

Q15 If you wish to make any other comments on the Draft LDP, enter your comments in the box below [Please use **BLOCK CAPITALS**]

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 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.

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Maldon District
Draft Local Development Plan
(2014-2029) Consultation

Representations on behalf of:

Mr. Malcolm Payne

Land at Mill Field, Hall Road, Great Totham

(ref. MF2)

REPRESENTATIONS ON BEHALF OF MR. MALCOLM PAYNE

1. The Representations fall into two parts. The first part responds directly to questions 1-3 and 7 as set out on the official consultation questionnaire whereas the second part comprises a site-specific representation relating to land at Mill Field, Hall Road, Great Totham and is made in response to question 14.

Part 1: Response to consultation questionnaire

Q1 - Do you support the overall vision for the District set out in the Draft LDP?

2. This is somewhat of a moot point insofar as the overall vision of the Plan is to meet the definition of sustainable development as set out in the National Planning Policy Framework (NPPF) by balancing the need to provide the required level of new housing, jobs and infrastructure with the need to protect the District's heritage and environment.

Q2 - Do you support the proposed level of growth in the District (Policy S2)?

3. As a general note, and with particular regard to the preceding *Spatial Vision*, it is disappointing that *Policy S2: Strategic Growth* focuses almost exclusively on housing provision and that reference to employment is limited to a single sentence at the very end of the policy which pledges 8.4 hectares of new employment land to be provided in new allocations at Maldon and Burnham-on-Crouch. The policy makes no effort to balance the provision of housing and employment land outside of these settlements.
4. The Plan makes provision for a minimum of 4,410 new homes over a fifteen year period - equivalent to 294 new dwellings per annum - which the Council claims will meet the objectively assessed need for housing in the District as required by paragraph 47 of the NPPF. However, having reviewed the lower-case justification at paragraphs 2.16-2.36 of the Plan together with the Council's evidence base, we question whether the provision of 294 dwellings is truly representative of local needs, not least because the latest update to the Strategic Housing Market

Assessment (SHMA, 2012) concluded that the need for affordable housing alone is 245 dwellings per annum whereas total housing need is calculated to be 932 dwellings per annum.

5. Paragraph 47 of the NPPF requires local planning authorities to significantly boost the supply of housing by ensuring that their Local Plans meet the full, objectively assessed needs for market and affordable housing in the housing market area. To obtain a clear understanding of current and future housing needs, paragraph 159 requires them to work with neighbouring authorities to prepare a SHMA to identify the scale and mix of housing, and the range of tenures that the local population is likely to need over the plan period. As a basic guideline, the results of the SHMA should:

- *meet household and population projections, taking account of migration and demographic change;*
- *address the need for all types of housing, including affordable housing and the needs of different groups in the community; and*
- *cater for housing demand and the scale of housing supply necessary to meet this demand*

(NPPF, para 159)

6. Our interpretation of this paragraph is that the requirements have equal weight and status such that population projections cannot be used to override household projections, for example. However, it would appear that the Council has largely dismissed the findings of its SHMA (which considered a range of data sources including the former East of England Plan, Sub National Population Projections (SNPP), the 2011 Census, DCLG household forecasts, the Greater Essex Demographics Study and local housing records) in favour of just one data source, namely the 2010-based update to the SNPP published by ONS in April 2012.
7. The principal reference document for preparing SHMAs is the DCLG publication *Strategic Housing Market Assessments Practice Guidance Version 2 (2007)* whilst further guidance is now also provided on the Planning Portal in an online

publication entitled *Assessment of housing and economic development needs*¹. Contrary to paragraph 2.21 of the Plan, the online guide states that household projections should provide the starting point for an estimate of overall housing need and not population projections. However, the guide also confirms that no single source of information will provide a definitive answer. In the circumstances, we feel it is important to take a holistic approach to data analysis as found in the SHMA.

8. Clearly there is a broad and complex debate surrounding the assessment of market housing needs which will vary significantly when modelled on different demand and migration trends. For the purposes of these Representations, we therefore focus on affordable housing needs which are calculated using the official DCLG model (as set out in the 2007 Practice Guidance) and are based on locally derived data.
9. For Maldon, the SHMA calculates the total affordable housing need for the District to be 245 dwellings per annum. The full calculation for this is set out on pages 73-82 of the document but may be summarised using the condensed data in Table 1 overleaf.
10. Gross current need is calculated by subtracting C from A, namely $984 - 324 = 660$ units. To address this over the whole Plan period a 'backlog rate' of 5.88% is applied (representative of 20% over five years as recommended in the DCLG model). This returns $660 \times 5.88\% = 39$ dwellings per annum. Newly arising need (B in the table above) is then added to this figure which returns a sub-total of 395 dwellings ($39 + 356$). Finally, subtracting the current annual supply (D) returns a total annual need of 245 dwellings ($395 - 150$).
11. Calculated in this way, the SHMA cannot reasonably be disputed insofar as it follows a Government endorsed model and takes account of current (and hence future predicted) re-let supply levels. Paragraph 2.22 of the Plan is therefore

¹ <http://planningguidance.planningportal.gov.uk/blog/guidance/assessment-of-housing-and-economic-development-needs/> (accessed 25.09.2013)

incorrect insofar as it suggests that the majority of need will be met by the turnover of existing stock. Indeed, para 9.1.16 of SHMA states emphatically that “...this is not happening in Maldon.”

Table 1 – Condensed affordable housing data (extracted from SHMA)

	Dwellings	Notes
A. Total Current Housing Need	984	Homeless and overcrowded households plus those in temporary accommodation,
B. Future Need	356	Newly forming households unable to buy plus existing households in need
C. Available Stock	324	Occupied dwellings plus surplus minus units to be taken out of management
D. Annual Supply	150	Supply of social re-lets and intermediate housing available for re-let or resale.

12. Returning to the matter of provision, the majority of affordable units are expected to be delivered as a proportion of market developments in accordance with adopted policy. It follows, therefore, that the overall level of housing provision predetermines the amount of affordable housing that can realistically be achieved over the Plan period. As set out in Policy H1, the Plan seeks to ensure that between 25.0-40.0% of all new homes are constructed as affordable units depending on the size and location of specific sites. Whilst the SHMA suggests that a higher target could be justified given the level of need, it acknowledges that 40.0% is not usually exceeded in normal economic conditions. Paragraph 9.1.26 confirms:

“Based on the robust evidence on the scale of affordable need found in this Assessment, an overall affordable housing target of 40% of new units, subject to economic viability could be justified.”

13. With this in mind, the Council would need to ensure that the Plan makes provision for sufficient housing to deliver the required number of affordable units as a proportion of total housing growth. This is elaborated in the online guide referenced on page 3 of these Representations which states:

“An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.”

14. In this context, we are alarmed to note that the overall level of housing provision has been set at 4,410 dwellings. This is because 40.0% of 4,410 dwellings equates to 1,764 affordable homes over the Plan period, or just 118 per annum. In other words, even if it were possible to achieve 40.0% affordable units on every allocated site (which is unlikely given that only the proposed Garden Suburbs and strategic sites in Maldon and Heybridge will be expected to meet the higher target – Policy H1), this would deliver less than 49.0% of the required affordable units.
15. Having regard to the above, we can only conclude the level of overall housing provision proposed in the Plan falls significantly below what is required by the NPPF and hence is inconsistent with national planning policy. In order to make the Plan sound, total housing provision must therefore be increased to a level which is commensurate with addressing current and future affordable housing needs.

Q3 - Do you support the proposed distribution of new housing (Policy S2)?

16. Notwithstanding our earlier Representations submitted in response to the Preferred Options consultation (ref. MF1, 2012), the Plan continues to distribute the majority of growth to four main sites – two of which are very large indeed and are dependent on major new infrastructure delivery - whilst exercising restraint elsewhere. At a time when the Council is unable to demonstrate a five year land supply, we maintain that such reliance on so few sites is a dangerous strategy which could potentially result in a serious under-delivery of housing when development fails to come forward at the point envisaged.
17. The problems associated with bringing forward the proposed Garden Suburb developments at Maldon and Heybridge are exacerbated by distributing such a small amount of growth (relative to identified needs) between the District’s villages which undermines and constrains their ability to make up potential shortfalls in delivery in the short and medium term. Moreover, the limited level

of growth proposed within villages is unlikely to underpin improved services and facilities and additional affordable housing – measures which could improve their sustainability and functioning as rural service centres.

18. In the circumstances, we believe there is a need to identify a strategy which provides a clear role for ‘Key Service Villages’ (KSVs) to become the focal point for their surrounding rural hinterlands (which each include a number of smaller villages), and with appropriate provision for growth which will maintain, improve and extend village facilities and services as an alternative to increasing reliance on more distant urban centres. This is a strategic issue which remains elusive in the Plan as currently drafted.
19. Whilst we support the basic approach of directing strategic growth to the District’s urban centres, and the ability of larger sites – at least in theory – to boost housing supply, we maintain that the formation of Garden Suburbs in a District such as Maldon is an unimaginative strategy which will do little to improve the sustainability of the District as a whole. Whilst we continue to support the ‘mixed use’ approach, the draft Plan is a far cry from a strategy which aims to redress the current imbalance between housing and employment, and the large levels of out-commuting. In reality, the Plan will serve only to ensure that large parts of the District remain out of reach of new facilities, services and employment generated within the Garden Suburbs.
20. We therefore continue to advocate positive provision for appropriate levels of growth in KSVs to supplement the limited number of strategic allocations in Policy S2, and particularly those KSVs that are satellite settlements to the main urban centres of Maldon and Heybridge. This alternative growth pattern, which would retain Maldon and Heybridge as the main ‘hub’ for growth and services but which would incentivise public transport improvements along radial routes connecting to KSVs like spokes on a wheel, would reinforce the commercial focus of Maldon and Heybridge whilst also serving more outlying areas with improved services.

Q7 - Do you support the strategy for housing development in other rural villages (Policy S7)?

21. To clarify, we assume that the reference in Policy S2 to ‘*other villages*’ does not just mean those settlements listed as *Other Villages* in Policy S8 but all villages excluding North Fambridge.
22. The NPPF places great emphasis on ensuring that Local Plans identify the size, type, tenure and range of housing that is required in particular locations, and that they seek to meet that need as best as possible. Against these requirements, whilst we applaud the support provided in the Policy for live-work units, micro business space and rural diversification, the provision of just 345 dwellings amongst the villages remains pitifully low and represents less than 8.0% of total growth. We dispute that such derisory levels of growth will be sufficient to meet the needs of existing and future residents, or to maintain or improve the function of villages as centres for the rural community which makes up almost two thirds of the District’s population.
23. We also strongly object to the decision to defer consideration of land releases in villages to a separate Rural Allocations Development Plan Document (DPD). Not only will this deprive villages of growth and investment in the short term, one questions whether it is reasonable and/or cost efficient to prepare a separate DPD to distribute such a limited level of growth. Given that the Council commenced work on the LDP in 2007, we can see no reason why village sites could not be allocated through the current Plan.

Part 2: Land at Mill Field, Hall Road, Great Totham

Q14 - Do you wish to comment on the Proposals Map or any other Policies in the Draft LDP?

24. As summarised in Part 1 above, we continue to promote a strategic role for Key Service Villages (KSVs, initially termed ‘Key Villages’) which we envisage would act as focal points for future growth and investment to serve the more

remote parts of the District whilst also supporting major growth in the urban areas of Maldon and Heybridge.

25. Scale and environmental constraints are important factors in determining which of the District's villages have the potential to function as KSVs, however we consider it is also important to assess each settlement in the context of its spatial and socio-economic relationship to other settlements. Certain villages, for example, might qualify as KSVs because they already constitute sustainable locations for growth by virtue of existing community facilities, employment, and the fact that they are already well-served by public transport. In other cases, the potential to improve connections and services within a village which benefits from a radial connection to the District's primary urban areas will also be an important consideration.
26. The strategy we champion is thus to form a network of 'satellite' KSVs which, in conjunction with the urban centres, would serve the District's outer and more remote hinterlands whilst continuing to direct major growth and services to Maldon and Heybridge. Far from a totally dispersed growth strategy which has the potential to undermine the function and status of Maldon and Heybridge and materially harm the character of villages, our strategy requires a relatively minor re-apportionment of growth to the District's KSVs as a means to make the District more sustainable as a whole.
27. In the context of this alternative strategy, Great Totham is ideally located on the B1022 between Heybridge to the south and Witham to the north, and is arguably less constrained by rural resources than other *Larger Villages* (Policy S8) such as Wickham Bishops. It also benefits from a well-developed service base and good public transport links with Maldon, Heybridge, Tiptree and Colchester. Great Totham is thus viewed as a satellite village to the primary urban centres and as a KSV it would fit neatly into a more concentrated focus embracing both Maldon and Heybridge and its satellite settlements.
28. Our Client has been actively promoting the release of Mill Field (defined in blue on the Plan at **Annex EGA1**) since 2007 and has submitted Representations at

various stages of the plan-making process. It was initially envisaged that the site would be developed for a mixture of uses including 129 market, affordable and live-work dwellings, Open Space and community facilities. However, whilst such a level of development would, in our view, form an attractive extension to the village and could be integrated into the landscape, it was subsequently concluded that a smaller housing element would be more environmentally sensitive and proportionate having regard to the size, growth and setting of the village.

29. The revised scheme has therefore been substantially downsized and comprises 50 market and affordable houses and a community pocket park. Development would be confined to the western half of the site - allowing the eastern half to provide an open space buffer which would enhance the setting of the village.
30. In view of the Council's current inability to demonstrate a five year land supply, and having regard to its decision to defer consideration of Rural Allocations to a separate DPD, the landowner has recently submitted an Outline Planning Application for the development which is currently being processed. By way of a summary of that Application, we request that the site at Mill Field be released for village housing for the following reasons:
 - Whilst now constituting a greenfield site, Mill Field was originally a quarry which was poorly restored and the resultant agricultural value was seriously degraded. Technical studies have been undertaken which demonstrate the stability of the land and its suitability for development after many years of neglect and disuse.
 - The release of Mill Field for further village housing would not represent a loss of high quality agricultural land, whilst the poor soils would nevertheless be sufficient to support landscaping.
 - The proposed village housing will make a positive contribution to the sustainability credentials of Great Totham itself, as well as to the reservoir of housing land available within the District.

- The development of the site represents a natural extension to the existing Settlement Boundary whilst the community pocket park would provide a long term defensible boundary for the village.
- The scheme will deliver an eclectic mix of market and affordable dwellings as well as associated internal open space. Land on the eastern flank of the site can contribute to the integration of the development into the landscape and provide a visual and recreational amenity for the wider community.
- The scale of the proposed development is regarded as appropriate for the size of Great Totham and is consistent with the role we identify for the settlement as a Key Service Village.



Chartered Town Planner

October 2013

Annex EGA1

Land at Mill Field, Hall Road, Great Totham

