

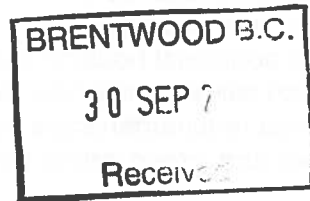
# MALDON DISTRICT COUNCIL

Princes Road  
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24 September 2013

Planning Policy Team,  
Town Hall,  
Ingrave Road,  
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Essex  
CM15 8AY



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Dear Sir/Madam

## **RE: Brentwood Borough Local Plan Preferred Options Consultation**

Maldon District Council welcomes the opportunity to comment on the Brentwood Local Plan Preferred Options document published for consultation on the 24<sup>th</sup> July. This letter sets out the initial response of Maldon District Council to this consultation.

Please note that this consultation response must be reported to Planning & Licensing Committee on 3<sup>rd</sup> October and that further changes may be added. Should subsequent changes be required, amendments will be communicated with you before Monday 7<sup>th</sup> October.

In accordance with section 110 of the Localism Act 2012, Maldon District Council (MDC) is continuing active engagement and joint-working with Brentwood Council on a range of cross-boundary issues. Despite not sharing a direct boundary, we recognise that co-operation on planning issues is necessary and have demonstrated willingness through our membership of the Heart of Essex sub-area.

To comply with the NPPF, Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. Our collaboration work includes commissioning key pieces of evidence base, including the Heart of Essex Housing Growth Scenarios, Heart of Essex Economic Futures Study and regular meetings to discuss cross-boundary planning issues. Under the same spirit of co-operation, MDC also participates with the Thames Gateway and Haven Gateway areas to engage with cross-boundary planning issues.

Under the provisions of the Duty-to-Cooperate, MDC has explored opportunities for meeting the unmet need beyond the District boundary but has not found a willing partner despite constructive, active and on-going engagement with its neighbours. MDC is therefore seeking to meet its own objectively assessed need for housing ensuring that other authorities in Essex or Suffolk do not receive additional pressure for housing.

On the 28<sup>th</sup> August 2013, MDC began a public consultation on its Draft Local Development Plan (LDP) which sets out to meet the District's own objectively assessed housing need (OAN). This has been set at an annual requirement of 294 dwellings, based on the District's projected household formation rates (Edge Analytics, Greater Essex Demographic Forecasts Phase 3, 2012), and has been approved by Council despite some evidence of relevant



constraints. To meet this need, the Council had to increase its housing requirement substantially from the Local Development Plan: Preferred Options Consultation 2012 recommendation of 200 dwellings to 294 dwellings per annum.

During the preparation of its draft LDP, MDC have identified significant environmental and infrastructure issues and have sought to mitigate the impacts whenever possible. Identified, but currently unjustifiable issues, include the lack of secondary school capacity, limited sewerage capacity, particularly in rural areas and few sustainable transport options. Maldon District is a largely rural district with a rural character, a character which would likely be compromised should MDC have to accommodate additional housing above the level outlined in the draft LDP. These issues, along with research carried out for the draft LDP, suggests that levels of housing growth above our OAN-based requirements are highly unlikely to be deliverable due to significant environmental issues and strong infrastructure constraints.

Paragraph 47 of the NPPF states that local planning authorities should significantly boost the supply of housing to meet their own objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF. While we accept that Maldon, Chelmsford and Brentwood Council are part of the Heart of Essex housing market area, Maldon is not subject to the same housing pressures experienced by our Heart of Essex partners. Due to geographical distance, poor rail and road links, and travel-to-work time, Maldon experiences less housing pressure than London commuter belt authorities, and is unable to meet the housing needs for these authorities.

The revised Local Development Scheme (Maldon District Council, 2013) sets out the timetable for the Council's production of its Local Development Documents. Due to the pressure for development in Maldon District which includes proposals outside of the draft LDP, and competing large and small development schemes, it is important that adoption proceeds expediently and without delay.

For the reasons outlined above in this letter, Maldon District Council concludes with respect, that it is not possible to consider taking additional growth from neighbouring authorities or authorities within the three housing market areas that we participate with.

Kind Regards,



Derek Lawrence  
Head of Planning Services