

**SCHEDULE OF RESPONSES TO REG 16 CONSULTATION & BURNHAM-ON-CROUCH TOWN COUNCIL'S RESPONSES/RECOMMENDATIONS AS ADOPTED AT ITS MEETING ON TUESDAY 17 JANUARY 2017**

<b>Ref No. &amp; Name</b>	<b>Subject/section</b>	<b>Comment</b>	<b>Response/recommended action</b>
<b>1 Allotment Association</b>	<b>Allotments - Policy CS-5</b>	<p>I am making a response on behalf of the Burnham Allotments Association. I am a committee member of the Association as Plot Secretary.</p> <p>With regard to the section Policy CS-5-Allotments. Whilst it is noted in that policy that the Allotments are a "valued and well used resource" it may be of help to state the current position regarding their use to reinforce that statement.</p> <ol style="list-style-type: none"> <li>1. There are 267 plots of which five are currently vacant. The allotments are in Devonshire Road, Burnham on Crouch.</li> <li>2.. Plot holders 188, (some plot holders have more than one plot)</li> <li>3. The Association bulk buy materials for the benefit of plot holders.</li> </ol>	<p><b>Noted.</b></p> <p><b>Noted.</b></p>
<b>2 Anglian Water</b>	<b>5.8 Recycling works and underground sewage/surface water infrastructure</b>	<p>It is suggested that the heading is amended to the following:  <i>Water recycling centres and underground sewerage/surface water infrastructure</i></p> <p>This suggested amendment reflects Anglian Water terminology.</p> <p>It is stated that current statutory requirements require consultation with relevant authorities on major applications. However, Anglian Water is not a statutory consultee on planning applications, which means we are not automatically consulted on all development proposals. We do however actively engage in the</p>	<b>Agreed – amend NP.</b>

	<p>planning process by responding to major developments and minor developments if the LPA ask us to. In addition we screen weekly planning lists to ensure that we pick up on development proposals. We also comment on specific proposals where requested to do so by the LPA. We are, however, currently lobbying for the legislation to be changed as we feel it is vital that we do become a statutory consultee. Please click on the following link for more information: <a href="http://www.anglianwater.co.uk/about-us/current-projects.aspx">http://www.anglianwater.co.uk/about-us/current-projects.aspx</a></p> <p>In regards to funding sources, developers fund some of the improvements; however, it is important to remember that developers cannot be expected to help resolve current issues and existing problems. They can only fund what is needed in relation to the development proposal.</p> <p>The charges which are applied by water companies in relation to new development include the following:</p> <p><b>Anglian Water Services Ltd</b> Thorpewood House Thorpewood Peterborough PE3 6WT Tel 0345 0265 458 <a href="http://www.anglianwater.co.uk">www.anglianwater.co.uk</a> email: <a href="mailto:hwilson4@anglianwater.co.uk">hwilson4@anglianwater.co.uk</a> Our ref 00017463</p> <p><i>Connection charges</i> paid by the developer to the relevant water company. We recover the costs of connecting the premise to the water main or public sewer.</p> <p><i>Requisition charges</i> paid by the developer to the relevant water company. We recover the costs</p>	
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reasonably incurred by the water company in providing the assets to serve the new development. Requisition charges also include the cost of network reinforcement triggered by the development. Not all new connections require a requisition.

*Infrastructure charges* paid by the developer to the water company when a premise is connected to the company's water supply or sewers for the first time. They contribute towards wider network reinforcement. Any upgrades required to the foul sewerage network to serve the new development will be funded by developers through the provisions of the Water Industry Act 1991.

We also offer a pre planning service to developers which includes a capacity check to determine the impact of sewerage from a proposed development. We will also work with the developer or landowner during this process to develop foul and surface water (where applicable) drainage solutions which will not cause a detriment to our existing customers or future customers. We would encourage the prospective developer to contact us at the earliest convenience to discuss drainage proposals to serve the development. Details regarding this service can be found at:  
<http://www.anglianwater.co.uk/developers/pre-planning-service-.aspx>

Anglian Water is responsible for the operation and maintenance of the existing foul and surface water sewer network within Burnham on Crouch.

In general, water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through

	<p><b>Policy PI.19</b></p>	<p>our Asset Management Plan.</p> <p>Foul network improvements are generally funded/part funded through developer contribution via the relevant sections of the Water Industry Act 1991. The cost and extent of the required network improvement are investigated and determined when we are approached by a developer and an appraisal is carried out.</p> <p>It is suggested that the text be amended to reflect Anglian Water concerns as outlined above.</p> <p><i>Ensure that <b>developers demonstrate that there is or will be sufficient infrastructure capacity at Burnham On Crouch Water Recycling works Centre and within the underground sewage/surface water infrastructure in the town to meets all current and projected future <b>necessary</b> requirements.</b></i></p> <p>Reference is made to CIL in regards to funding; this should be removed as provision is made in line with the Water Industry Act.</p>	<p><b>Agreed – amend NP.</b></p> <p><b>Agreed – amend NP.</b></p>
	<p><b>Policy EN.2</b></p>	<p>Anglian Water welcomes Policy EN.2 which will ensure that sustainable drainage systems (SuDS) are seen as an integral part of the proposed development within the neighbourhood plan designated area.</p> <p>We would wish to see in the policy that all new development should adhere to the surface water management hierarchy outlined in Part H of the Building Regulations with disposal to a surface water sewer seen as a last resort. Under no circumstances will surface water be permitted to discharge to the</p>	<p><b>Noted.</b></p> <p><b>Agreed – BTC to request MDC to include in its consultation protocol.</b></p>

	<p><b>Policy HO.6</b></p> <p><b>Chapter 10 – Housing Site Allocations and RAG Sheet</b></p> <p><b>Asset Encroachment</b></p>	<p>public foul sewerage network. We would want to see a surface water drainage solution identified and implemented prior to the construction of hard standing areas to protect our existing and future customers.</p> <p>It is pleasing to see that this policy refers to reduced water usage.</p> <p>Within the document reference is made to allocation sites in the Maldon emerging local plan, our position on these is explained below.</p> <p>Anglian Water has made an assessment of the available capacity at the Water Recycling Centre (WRC) (formerly known as sewage treatment works) and the foul sewerage network for each of the proposed sites contained within the consultation document.</p> <p>Please find Anglian Water’s comments below, these comments relate to sites identified in the consultation document and should be read alongside the attached RAG sheet.</p> <p>It is important to note that this assessment does not take account of the cumulative impact of development on the WRCs and the foul network. The sites proposed would be served by Burnham on Crouch WRC. This WRC does have current capacity to serve the proposed growth. However, infrastructure upgrades to the foul network will be required to serve the proposed growth.</p> <p>The allocation North of Burnham on Crouch (East) is in close proximity to a pumping station. It may be that the layout of the sites can be adjusted so as not to encroach on the protection zone. Development should be located a minimum of 15 metres from Pumping</p>	<p><b>Noted.</b></p> <p><b>Agreed – MDC to action in the LDP.</b></p> <p><b>Noted – BTC to press for assurances that ensure that the “network” to the WRC is upgraded to allow for all development proposals in the Town.</b></p> <p><b>Noted.</b></p>
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	<p><b>General</b></p>	<p>Stations. The landowner/developer is advised to contact us at the earliest opportunity to discuss the viability of the sites.</p> <p>Where there are sewers or water mains crossing the site, the site layout should be designed to take these into account; this existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The sewers or mains should be located in highways or public open space. If it is not possible to accommodate the existing sewers or mains within the design then diversion may be possible under section 185 of the Water Industry Act 1991 or entering into a build over/near agreement may be considered. I would draw your attention to Anglian Water encroachment policy <a href="http://www.anglianwater.co.uk/developers/encroachment.aspx">http://www.anglianwater.co.uk/developers/encroachment.aspx</a> Surface Water</p> <p>We closely monitor housing and economic growth in our region to align investment and the operation of our infrastructure to additional demand for used water. Anglian Water will be preparing a business plan in the next year which will identify the need for further investment to accommodate growth within the Anglian Water region. Local Plan growth targets and the timing of sites will be a key source of information to inform our business plan. At the appropriate stage we will also be consulting on this document.</p>	<p><b>Noted.</b></p>
<p><b>3 Anita Harris</b></p>	<p><b>PI.19 Surface</b></p>	<p>Whilst I feel the NP does reflect the views expressed</p>	

	<p><b>Water Infrastructure.</b></p>	<p>by residents, I do not feel it has put sufficient emphasis on the surface water problems that follow even moderate rainfall.</p> <p>I would use the problems faced at Hester Place and the Village Hall car park as examples. Neither are currently, or likely to be, subject to further planning applications, but remedial work is required.</p> <p>My suggestion is that there needs to be a wider ongoing review where surface water is a problem with a defined responsibility for ensuring a remedy is found and corrective action taken.</p>	<p><b>Agreed – where appropriate for infrastructure improvements.</b></p>
<p><b>4 BROOD &amp; "Say No"</b></p>	<p><b>Strategic Policy</b></p> <p><b>Policy CS.3 –</b></p>	<p>The current draft Neighbourhood Plan correctly states that "<i>The key infrastructure requirements that are necessary to enable strategic growth in a sustainable manner are set out in Policy S2, S6 and E1 of the Maldon District Council Emerging Local Development Plan (2014-2029). These improvements include increased local highway capacity, improved public transport provision, increased schools provision, enhanced medical provision, flood mitigation measures, surface water flooding alleviation and significant increases to public open space. Without this infrastructure, the delivery of sustainable communities will not be possible.</i>". It is believed that the MDC LDP Evidence base referred to above is now well out of date – This requires completely updating by MDC early in 2017 and be kept up fully to date to fully support the processes in Policy HO.4 for the entire life of the LDP and NDPs</p> <p>This policy needs fleshing out. In particular it requires</p>	<p><b>Agreed – to be firmed up subject to</b></p>

	<p><b>New Sports and Amenity Space</b></p> <p><b>Policies PI.10 and PI.11</b></p> <p><b>Policy PI.13</b></p>	<p>specific details covering exactly what needs to be done and a prioritised implementation plan. At the moment it's just an unsupported wish-list <i>'that Riverside Park should have significant investment, in line with other District parks in Maldon. Ideas to improve the park included a nature trail, better lighting, a water based activity such as a boating lake or paddling pool, improving and expanding the open air amphitheatre, an area designed for festivals and events, provision of public toilets, areas of more formal gardens with seating, a pitch and putt facility, tree planting, improving the connection to the River Crouch and improving maintenance, especially of the all-weather surface footpaths.'</i></p> <p>Needs to clarify and be expanded per the Emerging LDP to absolutely sure that there are safe separated Cycle Paths connecting the Strategic Allocation Estates to Ormiston Academy and the shops/surgery etc facilities in the established town over the rail bridge. These need to be designed and constructed such that already narrow Maldon and Southminster Road carriageways are not compromised in any way for cars and truck normal usage. These new paths have to be additional to the existing narrow road network and suitable for Motability Scooter usage in every way – not cannibalise precious main road space creating safety hazards</p> <p>Note:  1/ Not sure what is meant by Global Business  2/ 2nd bullet needs to clarify that amongst the problems @ Wickford are the total lack of safe waiting rooms or security/ station staff after 18:00 most days.  This is totally unacceptable and has led to lone females</p>	<p><b>viability and priority via discussions with MDC.</b></p> <p><b>Agreed – NP to be amended.</b></p> <p><b>Noted.</b></p>
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		being harassed and in at least one case being attacked. Lack of inspectors/conductors on Crouch Valley trains after 18:00 creates similar issues of anti-social behaviour +. If Burnham plans to be a sustainable commuting town, the rule of law and order must be re-established and commuters living in new housing must feel secure	
	<b>Policy PI.17</b>	All Burnham car parks in all ownerships (incl Millfields and Providence!) suffer from deferred maintenance and in many cases poor lighting. If Burnham plans to be an attractive/safe tourist centre , this NDP needs to prioritise corrective action with appropriate Implementation Plans	<b>Agreed.</b>
	<b>Policy HO.4</b>	Requires strengthening and detailed with a draft process and SLA that either BTC asks MDC to subscribe to and implement to deliver the NDP's strategic intent or BTC is given delegated authority to handle (assuming adequate skill/resource base) <i>" Burnham Town Council would recommend to Maldon District Council"</i> requires strong rewording to clarify that this is a fundamental non-discretionary part of the NDP that MDC as the LPA has to follow	<b>Agreed – MDC to incorporate in its consultation protocol.</b>
	<b>Policy HO.7</b>	Similar to comment above re Policies PI.10 and PI.11 – This must emphasise the need for Cycle Paths to be on dedicated incremental real estate. Carving out lanes on Maldon/Southminster Roads would cause safety hazards & choke traffic	<b>Noted.</b>
	<b>Policy HO.9</b>	Needs to include Cycle Lane provision requirement per modified Policy HO.7 & HO.8 Very careful thought is needed re inclusion of any	<b>Noted.</b>

	<p><b>Community Infrastructure Levy (CIL)</b></p> <p><b>General</b></p>	<p>Amenity Area or Open Space – Suggest full consultation with existing nearby residents, who express concerns re security, safety, need for exclusion against potential vehicle ingress and overnight stays on landscaped areas</p> <p>Defined hard standing short term car park with well illuminated car parking to service safe drop-off/pick-up for nearby school would be a great community gain. Equally very important that in this sensitive location surrounded by problematic roads, the new development has generous private amenity car parking to avoid overspill onto Marsh Road</p> <p>It is acknowledged both in the District LDP and our town’s Neighbourhood Plan, that Burnham has limited/aging infrastructure and services that require urgent investment to overcome legacy issues as well as incremental impacts from new developments. CIL is an obvious and appropriate sources of funds for mitigation actions, however because MDC have worked hard with Developers and others to bring extra housing for the town forward (to help build the District 5 year land supply); none of the +600 extra houses approved to date have attracted CIL payments. In the spirit of the CIL Legislation, Burnham needs to spell out in its NDP that it requires an equitable share of the overall MDC CIL pot, even though very few of its own extra dwellings will directly contribute to that pot.</p> <ul style="list-style-type: none"> <li>▪ We enthusiastically endorse the strategic thrust of the latest draft and ask that both Councils proactively prioritise the early adoption of the plan with no further delay</li> </ul>	<p><b>Agreed – but prescribed by Govt. Regulation. BTC to press for equitable share of District wide CIL funds.</b></p> <p><b>Noted.</b></p>
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<b>5 Charles Church/Persimmon</b>	<b>Promotion of identified Strategic Site S2 (j) West of Southminster Road</b>	<p><b>Relates mainly to LDP issues.</b></p> <p>Charles Church suggests that Figure 12 should be amended to detail the access from Southminster Road</p>	<p><b>Noted.</b></p> <p><b>Agreed – amend NP.</b></p>
<b>6 Chelmsford City Council</b>	<b>4.4</b>	<p>While the early years/childcare and primary school capacity issues are addressed in 4.4, there is no mention of secondary school capacity.</p> <p>There appears to be no reference to this in the list of Evidence Base documents. Anecdotal evidence shows a cyclical shift of secondary school age pupils from Burnham-on-Crouch attending school in South Woodham Ferrers, and also the reverse.</p> <p>This may affect capacity at William de Ferrers School at South Woodham Ferrers, which may have implications for school capacity needs generated by development in the Chelmsford City area which will be outlined in its Local Plan Preferred Options in February 2017.</p> <p>If there is no impact anticipated from future housing development in Burnham-on-Crouch, this should be stated.</p>	<p><b>Agreed – ECC to monitor and to be included in evidence base.</b></p> <p><b>The LDP, page 39 Para 2.83 specifically refers to secondary education: -</b></p> <p><b>“The only secondary school in Burnham-on-Crouch is the Ormiston Rivers Academy. The pupil roll for the Ormiston Rivers Academy is forecast to decline as a direct result of the ageing population within its catchment area. The resulting pupil yield from the proposed growth in Burnham-on-Crouch can be sufficiently accommodated within the capacity of the school.”</b></p>

	<b>5.4 and Policy PI.13</b>	Burnham-on-Crouch Neighbourhood Plan should also commit to working with Chelmsford City Council and the South Woodham Ferrers Neighbourhood Plan Group, on the cross boundary issue of improving the quality of train services (including late evening services, changing services at Wickford, and reliability issues as outlined in the Policy PI.13) on the Crouch Valley Line, which passes through the Chelmsford City area.	<b>Agreed.</b>
<b>7 Direct Rail Services</b>	<b>General</b>	<p>I have been through the documentation and can you confirm there will be no requirements for the railway line to be closed during any of the planned works. I understand the station will be getting refurb/update and more services are being requested.</p> <p>If you can confirm about any line closures as this will have an impact on us.</p> <p>The only other concern we may have is if new houses are being built by the railway line to put some noise barriers in place, especially if the frequency of services are planned to increase.</p> <p>From experience noise can be a key factor and the new houses should have something to deter the noise level they are exposed to.</p>	<b>Noted.</b>
<b>8 Environment Agency</b>	<b><u>Ecology and the Water Environment</u> Crouch Estuary Development</b>	The plan includes sections on the river and the environment and we welcome the recommendation for the general avoidance of any major development next	<b>Noted.</b>

	<p><b>Water Framework Directive</b></p> <p><b><u>Seawall Surfacing Materials</u></b></p> <p><b><u>Tidal Defences</u></b></p>	<p>to the Crouch Estuary.</p> <p>The plan currently makes no reference to the Water Framework Directive (WFD) or the River Basin Management Plan. A minimum requirement under the directive is to prevent deterioration in the ecological status of WFD water bodies including, in this instance, the Crouch Estuary, Goldsands Bridges Ditch and Raywick Redward Ditch.</p> <p>We would welcome the addition of text in the plan to consider how, where relevant, protective measures or enhancements can be sought through the policies in the Neighbourhood Plan.</p> <p>For example the incorporation of Sustainable Drainage Systems (SuDs) in new developments should be encouraged to provide wildlife habitat and prevent deterioration in the water quality through contaminated run off.</p> <p>Policy RI.1 suggests improvements to seawall access, and this would require a Flood Risk Activity Permit under the Environmental Permitting Regulations 2010. While this proposed development is to be welcomed as part of the England Coast Path, we would welcome early discussions to ensure that consideration is made to minimise any environmental impact. Particular attention should be given to the more remote section of sea wall towards Holliwell Point and also the sea walls to the West of Burnham to avoid impacts on the unique flora of the SSSI. Text should be included to reflect this.</p> <p>Studies are ongoing into the future lifespan of existing tidal defences in Burnham on Crouch. Any future public realm works within 16m of the tidal defence must not</p>	<p><b>Agreed – amend NP.</b></p> <p><b>Agreed – amend NP by adding: - All work along the river will be performed in conjunction with the Environment Agency and in compliance with Environmental Permitting Regulations 2010 and in recognition of areas of SSSI.</b></p> <p><b>Noted.</b></p>
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	<b><u>Floodgates</u></b>	<p>hinder its maintenance and would require a Flood Risk Activity Permit. The outcome of an engineering investigation to be carried out this financial year will be shared with Burnham Town Council and Maldon District Council.</p> <p>If the Town Council wishes to use floodgates to increase access to the foreshore, arrangements called 'flood dam notices' will be required which places legal duties on the owner of the gates regarding their operation. The present Environment Agency policy for Burnham on Crouch is to seek removal of floodgates which are no longer in use wherever possible. Text should be included in the plan to highlight this.</p>	<b>Agreed – amend NP by adding: - Where access is required to the foreshore this will be received in consultation with the Environmental Agency in relation to the removal of floodgates that have become redundant.</b>
<b>9 ECC – Transport/Plans/Dev</b>	<b>Background</b>	Essex County Council (ECC) welcomes the opportunity to provide officer comments to the consultation regarding the draft Reg. 16 Burnham-on-Crouch Neighbourhood Plan in relation to the key functional areas of the County Council. It should be acknowledged that the comments below are technical officer comments regarding parts of the plan that relate to ECC key functional areas, and are primarily regarded as advisory in nature. Specific comments to strategic development sites will be provided through our statutory consultee role as highway, education, lead local flood, minerals and waste authority, and have already been, and will be made at the planning application stage where appropriate.	<b>Noted.</b>
	<b>ECC Interest in the Burnham on Crouch Neighbourhood</b>	ECC is keen to influence and shape future spatial development strategies and policies delivered by local planning authorities and communities throughout Essex. ECC also aims to ensure that local strategies	<b>Noted.</b>

	<p><b>Plan</b></p> <p><b>ECC Comments</b></p> <p><b>Relationship to the Maldon District Pre Submission Local Plan (2014 – 2029)</b></p>	<p>and policies will provide the greatest benefit to deliver a buoyant economy for existing and future persons that live, work, visit and invest in Essex. Involvement is necessary because of the ECC role as,</p> <ul style="list-style-type: none"> <li>• a key partner within Essex promoting economic development, regeneration, infrastructure delivery, environmental improvements and new development throughout the County; and</li> <li>• the strategic highway and transport authority, including responsibility for the delivery of the Essex Local Transport Plan and as the local highways authority; local education authority; Minerals and Waste Planning Authority; and major provider of a wide range of local government services throughout the county of Essex.</li> </ul> <p>As part of the internal consultation process relevant functional areas within ECC have been consulted to consider if there are any implications on their service. Their comments have been incorporated into this report, and relate to the following sections Relationship to the Maldon District Pre Submission Local Plan (2014 – 2029); Community and Social Infrastructure; Physical Infrastructure; The Environment; The River; Heritage and Character; and Housing.</p> <p>ECC welcomes the acknowledgement that this Plan should be read in conjunction with the emerging Maldon District Council Local Development Plan (2014 – 2029), and that Policy S1 – Strategic Housing Growth and Policy S2 – Strategic Employment Growth are consistent with those strategic sites submitted as part of the Local Plan.</p> <p>The Local Plan Inspector has recently published his</p>	<p><b>Noted.</b></p> <p><b>Noted.</b></p>
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		<p>Further Matters, Issues and Questions to be considered at hearing sessions from 10th – 20th January 2017. These include further discussion regarding highway and education capacity in Burnham on Crouch. Consequently, it is recommended that the Neighbourhood Plan should await the outcome of these hearings, and the Inspectors Recommendations prior to putting the NP to a referendum.</p> <p>Section 4 - Community and Social Infrastructure</p> <p>In progressing the evidence base to support the submitted LDP the County Council, as education authority, identified a deficiency in early years and childcare provision arising from the impact of the planned growth. The submitted LDP identified that there is sufficient capacity at the existing primary schools in Burnham on Crouch to accommodate the pupil product from the LDP allocation of 450 dwellings.</p> <p><i>Primary Education</i></p> <p>The primary education capacity at Burnham on Crouch was extensively discussed at the LDP examination in 2015, and has been subject to additional work by ECC, and developers, to identify capacity at the existing primary schools. The links to this additional work are listed below, Burnham-on-Crouch and Southminster Primary School capacity statement: <a href="https://www.maldon.gov.uk/downloads/file/10440/joint_primary_education_capacity_statement">https://www.maldon.gov.uk/downloads/file/10440/joint_primary_education_capacity_statement</a></p> <p>ECC response regarding the reduction in capacity of 417 to 390 places: <a href="https://www.maldon.gov.uk/downloads/file/10448/ess_ex_county_councils_response_03-03-2015">https://www.maldon.gov.uk/downloads/file/10448/ess_ex_county_councils_response_03-03-2015</a></p> <p>ECC has been consulted upon planning applications on two sites allocated in the Local Plan and this draft NP, namely Burnham West (Site S2 (i)) and Burnham</p>	
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	<p><b>Section 5 – Physical</b></p>	<p>North West (Site S2 (j)). The number of homes proposed at each site is not by itself sufficient to justify or fund a new primary school. However, ECC sought a s106 contribution from both applications to mitigate their impact on education. Both applications are within the priority admissions area for Ormiston Rivers Academy, which has a surplus of places, and no contribution was sought.</p> <p>The issue regarding sufficient school places is to be further considered at the new hearing sessions into the Local Plan, which are due to commence on 10th January 2017.</p> <p>Policy CS. 7 – Early Years Facilities</p> <p>Policy CS. 7 regarding the provision of early years and childcare is welcomed. In the preparation of the Maldon LDP, ECC assessed the potential need for such facilities arising from the planned growth in Burnham on Crouch, and concluded that a new 56 place facility was necessary. ECC regularly monitors the demand and type of early years provision required throughout the County. Any provision of new facility will need to be provided in the most appropriate location to meet the demand.</p> <p>ECC has responded to the planning applications on two sites allocated in the Local Plan, namely Burnham West (Site S2 (i)) and Burnham North West (Site S2 (j)). ECC has sought a s106 contribution from both applications to mitigate their impact on early years. The application regarding Site S2 (i) includes a nursery site within the outline part of the application, and is welcomed.</p> <p>In addition to the highway infrastructure associated with the identified local plan site allocations (see</p>	<p><b>Noted.</b></p>
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	<p><b>Infrastructure</b></p>	<p>Section 10), the draft neighbourhood plan also identifies some potential highway projects to improve vehicular access into and through Burnham on Crouch (Policies PI.1 – PI.12).</p> <p>The minor highway improvements suggested in these policies should be considered through the Maldon Local Highways Panel (LHP). These panels have been developed to support the Localism Agenda and are linked to the ECC Corporate Plan 2012-2017. They seek to give people a greater say and role in building safer and stronger communities, and securing the highways infrastructure and environment to enable business to grow.</p> <p>In order for these to be considered by the LHP the Town Council will need to complete an external LHP Scheme Request form (see attached). The form seeks to capture information around the problems being experienced rather than a suggested solution. ECC, and Essex Highways design engineers will then investigate the issues identified, and recommend appropriate feasible solutions, if there are any. Any LHP Scheme Request should also have the support of the local County Councillor, as indicated on the form. Any resulting feasible engineering solutions will then need to be presented to the LHP for their consideration, and potential implementation and funding. All schemes will be required to be in line with ECC policies, strategies and guidelines.</p> <p>Consequently, it should be stressed that the highway schemes identified are subject to the process identified above, and are not presently `committed' schemes with regards a solution or funding.</p> <p>As previously indicated projects PI1 and PI5 have been subject to the process above, and identified by local</p>	
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		<p>Councillors for consideration. Policy PI. 1 (LHP Reference LMAL 152027) is currently a proposed scheme included on the Maldon District LHP Potential Schemes List at a cost of £45,000. However, the LHP is fully committed with schemes for the period 2015/16, but will be considered for funding in 2016/17. Policy PI. 5 (LHP Reference LMAL 142019) - the LHP has investigated a potential 20mph speed limit on Marsh Road/Church Road/Southminster Road, Church Road/Southminster Road. These roads are designated as Priority Routes in terms of the Functional Route Hierarchy, and their role is to enable the safe and efficient movement of traffic. It is considered unlikely that a 20mph speed limit would either be adhered to or enforced by the Police. ECC recommends all schemes identified in these policies should be progressed through the Local Highways Panel.</p> <p>Policy PI. 13 – regarding rail improvements The issues identified in this policy are not the responsibility of the County Council, and will need to be addressed to Abellio East Anglia Limited, the successful bidder for the new East Anglia rail franchise. Reference to any funding by ECC should be deleted, and replaced with the Rail Franchise Operator.</p> <p>Policy PI. 15 – regarding Local Bus Services In Essex around 85 per cent of the bus network is provided commercially. Commercial operators set their own bus routes, maintain their own buses and run their services as their commercial interests dictate. Around 15 per cent of the bus network is supported by Essex County Council. Some of these services have to be provided by law, such as home to school transport for qualifying children; concessionary fares; looked</p>	
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		<p>after children; and adult social care. Other services are discretionary, such as those (largely run in the evening, on Sundays or in rural areas) where a commercial service isn't currently viable and Community Transport schemes.</p> <p>In 2015, ECC began a thorough review of its financial support for those local bus services that it pays for across the County. An additional consultation, Local Bus Network Review Consultation (November 2016), is being undertaken between 4 November 2016 and 3rd January 2017 with regards 8 services in the Maldon Area where the current contracts end in 2017. An online questionnaire can be completed via the following link: <a href="https://surveys.essexinsight.org.uk/BusConsultation">https://surveys.essexinsight.org.uk/BusConsultation</a>.</p> <p>The services being consulted upon are <a href="http://www.essexhighways.org/uploads/LRF/list-of-Maldon-services-expiring-2017.pdf">http://www.essexhighways.org/uploads/LRF/list-of-Maldon-services-expiring-2017.pdf</a>.</p> <p>The County Council is looking at a range of options for these services trying to reduce the cost of providing the services, while maintaining key transport links. This could mean reduced frequencies or reduced hours or days of operation or changes to routes. ECC also needs to manage the network in the light of changes to the commercial bus network, travel demand and changing corporate priorities over time. Consequently, the position regarding the funding of additional services by ECC should be considered within the context of the above consultation.</p> <p>Policy PI. 18 – regarding Broadband</p> <p>The Policy to support improved broadband provision is welcomed. This supports a priority within the MDC Economic Prosperity Strategy to improve connectivity within the District by ensuring the widest possible</p>	
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	<p><b>Section 7 – The Environment</b></p>	<p>coverage of Superfast Broadband which is particularly important for supporting rural businesses and creating new business opportunities.</p> <p>The majority of the properties covered by the Neighbourhood Plan area have already been connected to the Fibre upgrade by Superfast Essex. Other than small pockets the remaining properties will be connected between June 2017 – July 2018 by Superfast Essex (i.e. Cabinet Areas 4 and 6).</p> <p>ECC welcomes suggested policies encouraging the mitigation of flood risk (EN1; EN2), the use of wind power and possible other renewable sources (EN4; EN5), and new homes considering the risks relating to climate change.</p> <p>Policy suggestion EN2 – regarding Surface Water Management</p> <p>ECC welcomes the inclusion of the following wording in relation to `surface water flooding` into the Policy.</p> <p><i>'In accordance with national planning policy, inappropriate development should be avoided in areas at risk of flooding including areas at risk of surface water flooding.'</i></p> <p>All development proposals must give priority to sustainable drainage principles in the provision of surface water drainage to ensure that flood risk will not be increased either on or off site. Where development does occur it must be made safe and flood resilient for its lifetime. Runoff from new developments should pass through appropriate treatment stages to ensure that Water Framework Directives regarding water quality objectives are being met and that development is in line with paragraph 109 of the NPPF.</p>	<p><b>Noted.</b></p>
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	<p><b>Section 8 – The River</b></p>	<p>ECC as the Lead Local Flood Authority welcome the opportunity to provide advice should any sites in the neighbourhood plan area come forward where there may be opportunities to alleviate existing flooding.</p> <p>Policy RI.1 and RI.5  ECC supports reference to the England Coast Path (ECP) in Policy RI.1, with the Maldon to Burnham stretch planned to be developed in 2015/16 and the Burnham to Wallasea Island stretch in 2016/7. The final anticipated date for full implementation throughout Essex is 2020.</p> <p>The Coastal Path will bring walkers, visitors and tourists into Burnham on Crouch providing substantial economic growth opportunities for overnight accommodation and catering. Burnham is well positioned to benefit as a start and finish point having the train station link to London. Additionally the town offers the attraction as “Gateway to Wallasea Island’s RSPB reserve”, as referred to in Policy RI.5.</p>	<p><b>Noted.</b></p>
	<p><b>Section 9 – Heritage and Character</b></p>	<p>ECC welcomes the identification, and acknowledgement of importance, of the wide range of heritage assets throughout the Plan. In addition to referring to heritage assets recording by MDC, reference should also be made to the Historic Environment Record (EHER) for Essex as the most comprehensive inventory of the county’s historic environment, including Burnham-on-Crouch. This is maintained by the County Council, and MDC’s own website directs people to the HER and provides contact details. Potential housing developments all have the potential to contain archaeological deposits, and any application for these areas will be expected to be</p>	<p><b>Noted.</b></p>

	<p><b>Section 10 - Housing</b></p>	<p>supported by an appropriate archaeological desk-based assessment, field evaluation and mitigation strategy.</p> <p>The draft Neighbourhood Plan includes policies regarding strategic allocations S2 (i); S2 (j) and S2 (k) in the emerging Local Plan, and these are referenced in Policies HO.7, HO.8 and HO.9.</p> <p>Policies HO. 7 – HO. 9 indicate the preferred access points and layout of development according to the Town Council, and these suggestions should be made by the Town Council when they respond to the relevant planning application. ECC does not intend to provide comments on these suggestions, as it has a statutory responsibility, as highway authority, to comment on these sites at planning application stage. ECC is responsible for protecting the safety and efficiency of the highway network, as required by the National Planning Policy Framework (NPPF) paragraph 32, and seeks to ensure that such proposals for development:</p> <ul style="list-style-type: none"> <li>• are accessible by means of transport other than the private car</li> <li>• are designed to the correct standards</li> <li>• safe and suitable access to any site can be achieved for all people</li> <li>• have their impact on the highway network mitigated appropriately</li> </ul> <p>ECC formal response to applications regarding Local Plan sites S2 (i) and (j) have been submitted to MDC, as part of our statutory responsibility, and considered in the determination of planning applications.</p> <ul style="list-style-type: none"> <li>• Site HO. 7 – Maldon Road/Chandlers/Creeksea Lane (Local Plan S2 (i))</li> </ul> <p>In response to application FUL/MAL/14/00356, ECC, as</p>	<p><b>Noted.</b></p>
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		<p>the highway authority, considered the site to be in line with current National and Local policy and safety criteria and was acceptable in terms of safety and capacity impact upon the local and wider highway network. The applicant will provide a highway contribution, as per the LDP, for the Highway Authority to do a feasibility assessment with the aim of providing improvements to the B1010/B1021 Maldon Road/Church Road junction. A wider range of highway mitigation works have also been recommend by ECC in terms of access and connectivity. The Highway Authority concluded that the proposal would not be detrimental to highway safety, capacity or efficiency, and is consistent with Policy T2 of the Local Plan and ECC Development Management Policies (February 2011). The application has been approved subject to completion of the S106 agreement.</p> <ul style="list-style-type: none"><li>• Site HO. 8 – North of Burnham on Crouch West (Site S2 (j)) This revised scheme (FUL/MAL/16/00093) follows the refusal of planning permission in July 2015 (FUL/MAL/14/01234) and addressed the Council's reason for refusal. ECC made no objection to the site in relation to highways and access. Overall the highways authority concluded that 'the proposal will not be detrimental to highway safety, capacity or efficiency at this location or on the wider highway network'. Full Permission has been granted subject to S106. A contribution has been requested towards highway improvements in Burnham-on-Crouch related to the B1010/B1021 junction.</li><li>• Site HO. 9 – North of Burnham on Crouch East (Site S2 (k)) An application is expected to be submitted during 2017</li></ul>	
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<b>10 Essex &amp; Suffolk Water</b>	<b>General</b>	<p><b>We have no comments to make.</b></p> <p><b>The Company can supply an adequate level of water supply for the proposed development.</b></p>	<b>Noted.</b>
<b>11 Gladman Developments</b>	<b>Promotion of extra Development potential of Land off Southminster Road (opposite Cemetery)</b>	<b>Relates mainly to LDP issues</b>	<b>Noted.</b> <b>Site specific and subject to current appeal/Sec of State "call in".</b>
<b>12 Glyn &amp; John Hitcham</b>	<p><b>General</b></p> <p><b>Strategic Policy</b></p>	<p>We are totally supportive of the aims and intent of the plan, however we respectfully make the following points of fundamental detail:</p> <p>Page 19 of the NDP under 'Strategic Policy' (in line with the Emerging LDP) correctly identifies the need to ensure that Infrastructure Deficiencies are speedily dealt with as '<b><i>set out in Policy S2, S6 and E1 of the Maldon District Council Emerging Local Development Plan</i></b>'. <u>However</u> it is our belief that the Infrastructure Deficiencies for Burnham are not fully captured in the LDP lists and therefore they are flawed and require systematic updating on a regular basis by MDC if they are to be relied upon. For example the ongoing and chronic Flooding Issues frequently referred to @ Burnham Town Council meetings relating to Station Road, Hester Place and at the Carnival Hall (aka Village Hall) need remedial prioritisation and urgent funding</p> <p>We further recommend that District CIL and District/Town New Homes Bonus funds be allocated to</p>	<p><b>Noted.</b></p> <p><b>Response required from MDC.</b></p>

	<p><b>Policy HO 4</b></p>	<p>remedy these longstanding issues that otherwise would stop sustainable planned growth in our town and ask that the policy details of the final NDP be amended accordingly.</p> <p>Although (based on current calculation assumptions) we are aware that MDC has a land supply well in excess of 5 years we feel that in taking planning decisions on developments not covered in the Emerging NDP and LDPs, the District Council is often far too cautious and doesn't use the full power of the Neighbourhood Plan as potential grounds for refusal. <i>In a statement yesterday Dec 14<sup>th</sup>, the Housing Minister Gavin Barwell said "As more communities take up the opportunity to shape their area, we need to make sure planning <u>policy</u> is suitable for a system with growing Neighbourhood Plan coverage. <u>Building on proposals to further strengthen neighbourhood planning through the Neighbourhood Planning Bill, I am today making clear that where communities plan for housing in their area in a Neighbourhood Plan, those plans should not be deemed to be out-of-date unless there is a significant lack of land supply for housing in the wider local authority area. "This new rule will apply immediately. To be eligible, a Neighbourhood Plan must be less than two years old, have allocated sites for housing and the council has to have demonstrated it has a three-year supply of sites for housing. Communities who have already published their plans will be given time to review them in light of the new rule. In a debate on the Neighbourhood Planning Bill yesterday, Mr Barwell said he had written to the chief inspector of the Planning Inspectorate and planning officers drawing their attention to this change</u></i></p>	<p><b>Response required from MDC.</b></p>
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	<p><b>Need for expeditious determination</b></p>	<p><i>in planning policy.</i> We therefore recommend that BTC strengthen the processes between themselves and MDC to ensure that Policy HO.4 on page 60 is strengthened such that the NDP clarifies that non-inclusion in the NDP or no compliance with design standards are a full and complete rationale for refusal of a Planning Application, even if it would have otherwise been 'sustainable'</p> <p>Finally time is of the essence to put this NDP fully in place, it has already taken + 3 ½ years. We urge BTC and MDC to now set robust targeted processes in place to run the necessary Referendum Approval well before the currently indicated unambitious target of May 2017. Frankly the necessary work can with good will on all sides be easily telescoped to achieve a March Approval</p>	<p><b>Agreed – emphasise to MDC.</b></p>
<p><b>13 Gordon Clarke</b></p>	<p><b>General</b></p> <p><b>Comments</b></p> <p><b>Wording</b></p>	<p>I acknowledge the effort that has been put in by members of the Steering Group.</p> <p>The terms Burnham Town Council <b>supports/is supportive/encourages</b> etc. are used in the numbered Policies throughout the Neighbourhood Development Plan (NDP). In most cases the nature of that support is not detailed. For the Policies to be meaningful I think that the method of the support should be defined.</p> <p>The wording in the document is, in places, open to interpretation. This could lead to conflict depending on who is seeking to use a particular policy. One specific correction is required in the Section <b>River</b> paragraph</p>	<p><b>Noted.</b></p> <p><b>Noted – flexible implementation.</b></p> <p><b>Noted.</b></p> <p><b>Agreed – amend NP.</b></p>

	<p><b>Strategic Policy</b></p>	<p><b>8.1.</b> The Ordnance Survey uses the local spelling of <b>Holliwell</b> for the farm and point as does the racing mark in the river.</p> <p>a) We are about to enter year three of the Maldon District Local Development Plan (LDP) although it has still not been approved. This means that the NDP effectively supports the construction of 390 units in the Town in the next three years. I think that the NDP should recognise the slippage that has occurred and schedule the 390 units proposed for years 3 - 7 of the plan. Realistically developers are unlikely to achieve the planned programme.</p> <p>b) <b>Policy S1</b> - The NDP highlights a number of issues that need to be resolved before development beyond the 450 target can be considered. The plan identifies the need for improvement of local highway capacity but wording of the policy S1 fails to mention highway as an issue. It is clear that development of sites S2 (i) and (j) will limit the available options for an alternative route into the Town. I believe the NDP should address this issue. I would also ask that consideration be given to insertion of a Policy that the Town Council would not support development beyond the current boundaries of S2 (i) that could lead to Burnham extending to Creeksea Lane and Ferry Road.</p>	<p><b>MDC to respond.</b></p> <p><b>Agreed in principle – no further coalescence. (Confirmed in January 2017 at LDP EiP by the Inspector.)</b></p>
	<p><b>Physical Infrastructure</b></p>	<p>a) <b>Policy PI.3</b> - The wording of this policy is unclear. It suggests that the road between Alexandra Road and Devonshire Road junctions is Church Road whereas it is Station Road. As drafted it suggested that Church Road should have double yellow lines for its entire length from the railway bridge to the Marsh Road junction. Is this the intention?</p>	<p><b>Agreed – amend NP.</b></p>

		<p>b) <b>Policy PI.4</b> - The NDP benefit from stronger wording such as "Request the Highway Authority to implement" the one-way system detailed for Devonshire Road as a specific policy. The general comment of support for highway improvement could remain as a separate policy.</p> <p>c) <b>Policy PI.6</b> - The narrative in paragraph 5.2 highlights the problem of the "tight spot" outside Woodford's Garage in Maldon Road but the policy does not address the issue. I believe that investigation of an alternative route into Burnham, either north or south of Ostend, should be considered and planned for as part of the current NDP before possible options are lost with development of sites S2 (i) and (j). Letter - Burnham-on-Crouch Neighbourhood Plan - Consultation - dated 14 Dec 2016 cont.</p> <p>d) <b>Policy PI.7</b> - Is it being suggested that a second bridge be built on Marsh Road or that existing bridge would provide an alternative route into the Town if traffic control is installed to allow for one-way operation? The wording does not make it clear. In either case I do not think that Marsh Road is suitable for such use bearing mind the effect that additional traffic would have on St. Mary's School and the limited width of the road between Glendale Road and Church Road. What route would the necessary link road take from the bridge into the Town?</p> <p>e) <b>Policy PI.11</b> and <b>PI.12</b> - Please see my comments in relation to policy <b>HO.9</b>.</p> <p>f) <b>Policy PI.19</b> and <b>PI.20</b> - I agree with the intention of these policies but suspect that they have not been put to Anglian Water for their comment or take account of the provisions of the Water Industry Act 1991. My understanding is that under this Act</p>	<p><b>Noted.</b></p> <p><b>Noted.</b></p> <p><b>Noted.</b></p> <p><b>Noted.</b></p>
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	<p><b>Housing</b></p>	<p>sewerage undertakers, Anglian Water in our case, have a duty to provide, improve and extend a system of public sewers so as to ensure that an area is and continues to be effectually drained. There is a right for property owners or occupiers to have their drains or sewers communicate with public sewers. Under the Act Anglian Water can and does impose Infrastructure Charges. This provision can apply even if no new connection is required but the property is just modified to create an additional unit. The Act also applies to water undertakers who can also impose infrastructure charges. I think that the wording in relation to "have not contributed" needs to be checked for accuracy. If I am correct individual developers, of single units, currently face charges that the proposed policies seek to impose. To ask individual applicants to assess the capacity of the drainage system, into which they have a right to connect, is impractical. Who would check such assessments? Would lack of drainage capacity be a valid reason for MDC to refuse a planning application? I believe the NDP should, as a matter of policy, press Anglian Water to instigate the required improvements to the sewerage system and sewage treatment works.</p> <p>a) <b>HO.9</b> - I do not think that it is appropriate to develop site <b>S2 (k)</b> permitting vehicular access from Marsh Road. <b>Figure 13</b> in the NDP does not show how access is to be gained to this site. Bearing this in mind, I would suggest that a route from Southminster Road to the north of Pannel's Bridge and east alongside Pannel's Brook and then crossing the brook onto the proposed site should be used. This would avoid the need for construction and eventually</p>	<p><b>Noted – issues for examination when plans received.</b></p>
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		<p>resident's vehicular traffic using Marsh Road. Pedestrian access could be provided from the site to Marsh Road. This alternative vehicular access route could also be used to link with Stoney Hills and the proposed cycle route to Southminster. Traffic from Stoney Hills could be taken away from Mill Road and the Mill Road/Southminster Road junction at Eves Corner. The opportunity would also arise to improve the very narrow footpath on the eastern side of Southminster Road between Eves Corner and Ormiston Rivers Academy. Public open space could be created on the land to the north of and adjacent to Pannel's Brook. The area of S2 (k) to the east of St Mary's church, currently earmarked for play area, could be used for development perhaps with bungalows.</p> <p>6. The NDP considers the period 2014 to 2029. Should some reference be made to how the NDP is to be reviewed over the remainder of its 15 year life?</p>	
<b>14 Historic England</b>	<p><b>General</b></p> <p><b>Physical Infrastructure</b></p>	<p>Historic England is primarily concerned with the impact of proposals on the historic environment and our comments will focus on those aspects of the plan. We continue to welcome the acknowledgement of the historic environment contained in the Plan to the extent that Heritage and Character is identified as one of the seven themes, and that protection and enhancement of the town's built heritage is a key principle set out in Section 2.</p> <p>However, we still have the following concerns which I have highlighted below:</p> <p><i>PI03 Make Burnham a more pedestrian and cycle friendly place to live.</i> Policy suggestion PI11 is concerned with the provision of new cycle parking areas or shelters in the town. Such facilities are likely</p>	<p><b>Noted.</b></p> <p><b>Noted.</b></p>

	<p><b>Heritage &amp; Culture</b></p>	<p>to be located within the conservation area and therefore we recommend that the policy be strengthened by the addition of a requirement for new cycle provision to be appropriate and sensitively located to ensure there is no harm to the character or appearance of the conservation area, or the setting of the listed buildings located within the conservation area.</p> <p><i>HCO1 Improve Awareness of the conservation area in the town centre.</i> Whilst the Neighbourhood plan seeks to have the Burnham Conservation Area Appraisal and Management Plan update, this is not included within any policy. Historic England would suggest that there is policy requirement for the update of the town centre's conservation area appraisal which includes an up-to-date management plan</p> <p><b>Strategic Environmental Assessment/ Sustainability Appraisal/ Integrated Impact Assessment</b></p> <p>Historic England has no comments to make on this document.</p>	<p><b>Agreed – amend NP.</b></p>
<p><b>15 John James</b></p>	<p><b>General</b></p> <p><b>Page 41: 6 The</b></p>	<p>Having now read and considered the draft Burnham-on-Crouch Neighbourhood Plan I entirely support and endorse the plan in general and congratulate all of those personally and professionally involved in its preparation and production.</p> <p>Having been living and practicing in the town of Burnham-on-Crouch for over 35 years I wish for the following comments to be considered in respect of the specific matters and policies referred to below:</p> <p>I strongly support and encourage the creation of a</p>	<p><b>Noted.</b></p> <p><b>Noted.</b></p>



	<p><b>Economy - Policies EC6 &amp; EC6.1:</b></p> <p><b>Page 47: 8 The River – Policy RI.1</b></p> <p><b>Page 50: 8 The River – Policy RI.5</b></p>	<p>new purpose built “Visitor Centre” for Burnham-on-Crouch to be located on The Quay that is undoubtedly the only suitable location. Such important new facility will provide essential services and advice to visitors, tourists and the general public and would provide information on hotel and bed-and-breakfast accommodation, local features and facilities, Crouch ferry links, walking and wildlife and future RSPB advice on the Wallasea reserve etc.</p> <p>I strongly support the retention of the “Town Steps” and the intended improvements and widening of the public floating pontoon. This provides an important core feature for the residents and visitors to the Town – by foot and by boat and should be retained and improved in the public interest.</p> <p>As a long time member [and past Chairman] of the Crouch Harbour Authority and having been on the Crouch Coastal Community Working Group for the Lower Crouch Ferry Crossing project I fully support the proposed policy to enable Burnham-on-Crouch to become a “gateway” to the RSPB reserve development on Wallasea and this will be best implemented by the formation of a new all-weather and all-year ferry crossing from Burnham to the RSPB site and to the existing ferry terminal at Essex Marina. Such ferry service to provide all appropriate facilities for disabled person and wheelchair access and for cyclists with their cycle. You will know that this “aspirational” project has now been formally adopted by the CCCT that is fully and formally represented on by members of the Burnham Town Council, Maldon and Rochford District Councils. I believe the Neighbourhood Plan</p>	<p><b>Noted.</b></p> <p><b>Noted.</b></p>
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		must now make specific reference to this “adopted” project that will undoubtedly encourage and inspire the required regeneration of the Town of Burnham-on-Crouch and its economy, tourism and river activities.	
<b>16 Ken Harris</b>	<b>General</b>	My assessment is that the Burnham Neighbourhood Plan does generally reflect the residents' feed in/wishes. The process followed has led to a better understanding of the areas of administrative responsibility and accountability. I share the concern that the LDP approval is still awaited and that allows an uncertainty and wider licence currently than would be the case if both plans were in place.	<b>Noted.</b>
	<b>Windfall Sites – Pages 61/62</b>	My specific concerns [current and longer term] relate to ‘Windfall’ house building – well set out in pages 61/62. In the light of ongoing experience I remain sceptical that H04/H05 will provide the necessary safeguards, particularly around road and drainage capacity. Will the evidence required be available and provided and who will assemble/verify/validate it?  Looking forward I see it as essential that the plan is accepted, and used, as a working document – under which decisions are made – not simply put on the shelf!	<b>Noted.</b>  <b>Agreed.</b>
<b>17 National Grid</b>	<b>About National Grid</b>	National Grid owns and operates the high voltage electricity transmission system in England and Wales and operates the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the	<b>Noted.</b>

	<p><b>Specific Comments</b></p>	<p>transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customer. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distribution's Intermediate / High Pressure apparatus.</p> <p>National Grid has identified the following intermediate gas distribution pipeline as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> <li>• 1414Z Rettendon 02 7 BAR – IP Pipeline</li> </ul> <p>From the consultation information provided, the above gas distribution pipeline does not interact with any of the proposed development sites.</p> <p><i>Gas Distribution – Low / Medium Pressure</i></p> <p>Whilst there are no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within</p>	<p><b>Noted.</b></p>
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		proposed development sites. If further information is required in relation to the Gas Distribution network please contact <a href="mailto:plantprotection@nationalgrid.com">plantprotection@nationalgrid.com</a>	
<b>18 Natural England</b>		<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p><b>Natural England does not have any specific comments on this draft neighbourhood plan.</b> However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p> <p><b>Annex 1 -Neighbourhood planning and the natural environment: information, issues and opportunities – Attached to email.</b></p>	<p><b>Noted.</b></p> <p><b>Noted.</b></p>
<b>19 Nick Gilmour</b>	<p><b>General</b></p> <p><b>Front Cover – Clock Tower Date</b></p>	<p><b>Grammar &amp; punctuation errors.</b></p> <p>Could this image be replaced with one where the sky is blue and the sun is shining? Is October 2016 date correct? – Technically it was November 2016</p>	<p><b>Agreed – a further proof reading &amp; grammar check prior to publication for Examiner &amp; Referendum. Unnecessary.</b></p> <p><b>If time permits.</b></p> <p><b>Factually, BTC approved it in October 2016.</b></p>

	<p><b>P4 – Aerial town pic</b></p> <p><b>P5 – TM &amp; SG Chairman’s intro... Lots of grammar and punctuation corrections Plus misc pages throughout doc</b></p> <p><b>P17 – E</b></p> <p><b>P19 - 3.1 Policy S1 – Strategic Housing Growth</b></p> <p><b>P20 Strategic Housing Allocations</b></p> <p><b>P23 – Assets</b></p>	<p>insert "(".</p> <p>Also, has permission of the copyright holder been sought/granted? Or has the Town Council otherwise provided for future liabilities in respect of the use of this image without the express permission of the copyright holder?</p> <p>The whole document would benefit from professional proof-reading to ensure that is grammatically accurate, correct use of commas, semi-colons, etc. I have highlighted some examples on this page and others for illustration.</p> <p>Suggest insert "principally" to allow some leeway for those shops and facilities which can sustainably be located without the town centre</p> <p>should insert a reference as to the baseline date for this figure (i.e. 2014) so that subsequent windfall can be taken into account when calculating the permissible size of the strategic and future developments, including those yet to receive planning permission, for the purposes of seeking infrastructure contributions from developers</p> <p>should be updated to take into account windfall developments already built, in progress or yet to commence following granting of planning permission</p> <p>specifically add "the library" to this list</p>	<p><b>See General. Provided by Consultant under its authority.</b></p> <p><b>See General.</b></p> <p><b>Agreed – amend NP.</b></p> <p><b>Agreed – amend NP.</b></p> <p><b>Refer to LDP.</b></p> <p><b>Agreed amend NP.</b></p>
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	<p><b><i>IMPLEMENTATI ON Priority ongoing Lead Responsibility BTC, Funding Council Taxes</i></b></p> <p><b>P 23 4.2</b></p> <p><b>Policy CS.2 – Community Facilities</b></p> <p><b>P 24 Policy CS.3 – New Sports and Amenity Space</b></p> <p><b>Policy CS.4 – Amenity Space Provision in the North of the Town</b></p>	<p>Summary comment - these implementation statements are of an impenetrable format. As a minimum, please use colons and/or semi-colons to separate the distinct elements</p> <p>Funding for what exactly? None of these currently qualifies for direct support from 'council taxes'?</p> <p>insert "sustainable"</p> <p>insert "sustainable" and caveat the sentence with "which accords with other policies in this plan, e.g. transportation links"</p> <p>+ change to "will" to increase certainty of the policy intent</p> <p>+ Implementation: Contributions from developers should be sought to provide for required additional community facilities in place of funding from 'council taxes'</p> <p>append "...with a particular focus on the expansion and renewal of assets in Riverside Park, including better skate park, BMX track, sports pitches, gym trail, and walking and cycling routes linked to the rest of the town, particularly the north."</p> <p>+ Implementation - As with the space near the church, there should be a specific policy statement and implementation plan to support these aspirations</p> <p>append "... and be easily accessible from the north, west and south to serve both existing and new developments."</p>	<p><b>See General.</b></p> <p><b>Noted.</b></p> <p><b>Agreed – amend NP.</b></p> <p><b>Noted.</b></p> <p><b>Agreed – but needs details, see BROOD.</b></p> <p><b>Noted.</b></p>
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	<p><b>Policy CS.5 – Allotments</b></p> <p><b>4.4 Ensure there is a Supply of Primary and Early Years Education to Meet the Identified Need in the Town</b></p> <p><b>P26 First Para intro</b></p> <p><b>Policy CS.6 – St. Mary’s Primary School</b></p> <p><b>Policy CS.7 –</b></p>	<p>Note - this land could also potentially support the future expansion of Burnham on Crouch Primary School or for a swimming pool - please avoid using 'perpetuity' to preclude such uses + Implementation - funding for what?</p> <p>Has ECC confirmed this as at the date of the draft report?</p> <p>suggest strengthening this to be clear that, since 2014, the existing build, in progress or permitted windfall, plus strategic development sites has already caused a need for more primary places above existing capacity and all further development cannot possibly sustainable or permitted without implausible creation of additional primary school capacity.</p> <p>this has already happened? (expansion) + this is a political comment and presumes that capacity will even be available in Southminster (or beyond). Suggest amending policy to "When existing primary school capacity in the town is exhausted, development will not be permitted or regarded as sustainable without sufficient developer contributions to increase it."</p> <p>append "while maximising accessibility by the wider</p>	<p><b>BTC disagrees.</b></p> <p><i>See ECC Education evidence at LDP EiP in January 2017.</i></p> <p><b>Noted.</b></p> <p><b>Noted.</b></p> <p><b>Agreed – amend NP.</b></p>
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	<p><b>Early Years Facilities</b></p> <p><b>Policy CS.8 - Station and Foundry Lane Areas</b></p> <p><b>Policy CS.8.1</b></p> <p><b>Policy CS.8.2</b></p> <p><b>P29 Policy PI.2</b></p> <p><b>Policy PI.3</b></p> <p><b>P 30 Policy PI.5</b></p> <p><b>5.2 Improve road access into the Town</b></p> <p><b>Policy PI.6</b></p> <p><b>P 31 - Policy PI.10</b></p> <p><b>Policy PI.11</b></p>	<p>community."</p> <p>there is no evidence to support this idealism (BTC securing operational control)</p> <p>need to append an objective here</p> <p>is this in addition to the 450 homes? + "Secondary Area A"</p> <p>by whom? ECC want to put a roundabout here!</p> <p>It would be safer and more sustainable for the retail units at this location to reduce the width of the pavement and create recessed parking bays. This will maintain line of sight. As it is, the existing parking arrangements serve to slow traffic slightly - this may be a better outcome in the long term than removing them.</p> <p>insert "roads adjacent to"</p> <p>why is this in parentheses? (B1010)</p> <p>remove "need to" and "on a scheme"</p> <p>insert "and to the railway station"</p> <p>Append: "and seek similar provision at the Maple Way</p>	<p><b>BTC aspiration.</b></p> <p><b>Noted.</b></p> <p><b>Yes.</b></p> <p><b>NPSG, ECC to determine.</b></p> <p><b>BTC disagrees.</b></p> <p><b>Agree – subjective to feasibility.</b></p> <p><b>?</b></p> <p><b>BTC disagrees.</b></p> <p><b>Agreed – amend NP.</b></p> <p><b>Not feasible.</b></p>
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		<p>/ Foundry Lane crossing."  (Eastern Road bridge) + amend to "across the town centre at prominent locations, e.g. the railway station, health facilities, schools, retail, etc....  (secure cycle areas/parking)</p>	<b>Agreed – amend NP.</b>
	<b>P32 - Policy PI.13</b>	<p>"Global Business"????  Should maximise interconnectivity with Crossrail at Shenfield and Southend Airport</p>	<b>Yes.</b> <b>Agree.</b>
	<b>Policy PI.14</b>	<p>Insert dedicated</p>	<b>?</b>
	<b>P33 - 5.5</b>	<p>Replace Coop with Fiveways  + where is this available? (redesign Master plan)  + "working" ilo work</p>	<b>Agreed – but work in progress.</b>
	<b>Policy PI.16</b>	<p>Suggest "BTC will support planning applications for improvements to the railway station/Fiveways junction area which align to the aspirations of this Neighbourhood Plan"  + (Implementation) is this really Network Rail's remit?</p>	<b>Agreed – amend NP.</b>
	<b>P 35 -5.6  Improve car parking in the town centre</b>	<p>what about the parking at the Marina?</p>	<b>Refer to MDC and Crown Estates.</b>
	<b>Policy PI.17</b>	<p>Re Millfields - note, this would be at the expense of recreational green space. this should be replaced elsewhere if it is to be built on.</p>	<b>YES, but there would be long-term benefits.</b>
	<b>Policy PI.18</b>	<p>Suggest the Policy is modified to reflect that network providers ensure that <b>all</b> existing sites and new</p>	<b>Subject to ECC and Government.</b>

		developments across the town receive at least 2 bars of GSM reception including 3g/4g provision.	
	<b>P 39 - Policy EC.2</b>	provide examples of how this will be encouraged <b>(sic)</b>	<b>No.</b>
	<b>P40 - Policy EC.3</b>	insert "on both sides of the highway"	<b>Agreed – amend NP.</b>
	<b>P43 - 7.1 Ensure that Flood Risk is Carefully Considered in All New Development</b>	incorrect. "Some parts..." better	<b>Noted.</b>
	<b>Policy EN.4</b>	nebulous. Define or remove this policy	<b>Noted.</b>
	<b>P45 - Policy EN.6</b>	"protect and expand the range of materials accepted at the recycling amenity centre...."	<b>Noted.</b>
	<b>P 47 - Policy RI.1</b>	Ist bullet - "and cycling" 2 <sup>nd</sup> bullet - this could include the small public beach, much used in the summer Potential 4 <sup>th</sup> bullet - Add a bullet point to consider the creation of a natural amphitheatre near the beacon and/or an inspirational and tourist-attracting art installation	<b>No.</b> <b>Noted.</b> <b>Noted.</b>
	<b>P58 - 10.2</b>	Windfall - "have already been incremental approved applications and are..."	<b>Noted.</b>
	<b>P63 - Policy</b>	End 2 <sup>nd</sup> Para - insert "railway station"	<b>Agreed- amend NP.</b>

	<b>HO.7</b> <b>P70 - NHD.13</b>	2 <sup>nd</sup> sentence - be clear that these are attributes which should be avoided	<b>Agreed – amend NP.</b>
<b>20 Pigeon Land</b>	<b>Promotion of identified Strategic Site S2 (i) South of Maldon Road</b>	<p><b>Relates mainly to LDP issues</b></p> <p>2.3 In a number of paragraphs of the Neighbourhood Plan the remoteness of Burnham-on-Crouch is highlighted. This does not reflect the current situation. The LDP states for example in paragraph 2.81 that "<i>as a significant centre for employment, retail provision and community facilities, together with access to the Crouch Valley Line, Burnham-on-Crouch represents one of the most sustainable locations in the District for housing growth.</i>" Burnham-on-Crouch is the second largest town in the District, with some 8,000 residents, and has a hinterland including the Dengie Peninsular, with a population of some 15,000 people. This represents over a third of the Districts population and demonstrates that the area is not isolated as some of the justification for the policies towards the town suggests. The town is an important one serving a large number of people.</p>	<p><b>Noted.</b></p> <p><b>Disagree. See Quote from first LDP – 2.81 Housing: -</b>  <b>"Although Burnham -on-Crouch has many of the day to day services and facilities and access to local jobs that residents need. Its growth potential is severely limited by its relative isolation in the east of the District away from the wider strategic road network. The current level of service provision not as high as that in Maldon and Heybridge. It is therefore appropriate to limit the level of growth for Burnham-on-crouch to meet its own needs."</b>  <b>This text has been repeated in the current LDP – changes are in red: -</b>  <b>"As a significant centre for employment, retail provision and community facilities, together with access to the Crouch Valley Line, Burnham-on-Crouch represents one of the most sustainable locations in the District for housing growth. Although Burnham -on-Crouch has many of the day to day services and facilities and access to local jobs that residents need, its growth</b></p>

		<p>3.1 Neighbourhood Plan Policy S1 does not accord with the draft LDP Policy S2, or paragraph 2.81 of the draft LDP. LDP paragraph 2.81 states: “<i>the LDP seeks to deliver a minimum of 450 dwellings in Burnham-on-Crouch</i>”. Policy S2 of the LDP refers to minimum requirements. The Neighbourhood Plan Policy S1 should not refer to Burnham as having a “<i>target</i>” of 450 homes as this does not comply with the Districts strategic planning policy which sets minimum housing requirements.</p> <p>3.2 Policy S2 should reflect the findings of the Maldon District Council Employment Evidence and Policy Update July 2015 which identified a need for an additional 11.1 hectares of B uses employment land in the District including the 8.4 hectare allocated in the LDP.</p> <p>3.12 This policy states that all small applications and development proposals (i.e. under 10 homes) will need to commit to fund front loaded mitigation works to the</p>	<p><b>potential is severely limited by its relative isolation in the east of the District away from the wider strategic road network. The current level of service provision not as high as that in Maldon and Heybridge. It is therefore appropriate to limit the level of growth for Burnham-on-crouch to meet its own needs. As set out in Policy S2, the LDP seeks to deliver a minimum of 450 dwellings in Burnham-on-Crouch.”</b></p> <p><b>Agreed – amend NP.</b>  <b>Note: - 450 = Burnham’s share of the OAN, as per the LDP EiP in January 2017.</b></p> <p><b>Don’t need to restate every single LDP Para</b></p> <p><b>Infrastructure Evidence Base illustrates the issues that have accumulated by the marginal impact</b></p>
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		<p>sewerage/surface water infrastructure. This goes beyond what is required of such planning applications and is in excess of District and national planning requirements.</p> <p>3.23 Policy HO.3 requires that housing developments of 5 or more dwellings should achieve 12 "greens" against the requirements of "Build for Life" and be eligible for "Build for Life Outstanding Status." Such requirements should be dealt with by building regulations and no evidence has been put forward in the Neighbourhood Plan that the requirements are viable in Burnham-on-Crouch or are appropriate to the town.</p> <p>4.1 We appreciate the need for good design in any area and are pleased that the quality design of the Burnham West planning application has been recognised by the officers and members of the District Council. Essex has a comprehensive and well respected design guide that is known as the Essex Design Guide. The design principles in Appendix 1 need a number amendments where they go beyond the requirements of local and national planning policy and beyond the Essex Design Guide</p>	<p><b>of additional small historical developments not being addressed. This aims to avoid repeats and is subject to viability.</b></p> <p><b>(ref to B-on-C's aging population, prefer to stay in their own home as long as possible in line with Gov. policy)</b></p> <p><b>The Essex Design Guide dates back to 1997, since then there have been many substantial changes in some of its major assumptions E.g.: Average car size and average cars per average household. The Burnham Neighbourhood Plan seeks to update and enhance the EDG in key areas to recognise and address particular issues facing Burnham on Crouch in 2016 – 2031. The EDG was meant to mandate minimum guideline standards not Maximum guideline standards</b></p>
<p><b>21 RHS/Sadler/Tolhurst</b></p>	<p><b>Promotion of identified Strategic Site S2 (k) North of</b></p>	<p><b>Relates mainly to LDP issues.</b></p> <p>The explicit reference to requiring contribution towards improvement of Marsh Road is of some slight concern,</p>	<p><b>Noted.</b></p> <p><b>Agree.</b></p>

	<b>Marsh Road</b>	and needs to be viewed in the context of application of the tests in the CIL regulations, although it is welcomed that Para. 10.8 does make reference to the importance of compliance with the NPPF and in particular the role of viability as a key consideration.	
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