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Part 2 - Regulation 19 and 20 Town and Country Planning (Local Planning) (England) Regulations 2012 "Pre-Submission LDP" consultation

Please note that all comments on the Pre-Submission LDP consultation should be provided by completing Part 2 of this form. A separate completed Part 2 should be provided for each comment made within a representation.

2.1. To which part of the Maldon District Pre-Submission Local Development Plan (LDP) does this representation relate?

- | | | | |
|---|--------------|--|----------------|
| a. Paragraph
(please specify paragraph number) | All
_____ | b. Policy
(please specify policy reference) | All
_____ |
| c. Proposals Map | All
_____ | d. Other section
(please specify) | _____
_____ |

2.2. Do you consider the Maldon District Pre-Submission LDP to be (tick as appropriate):

- a. Legally compliant** Yes ☐
To be 'legally compliant' the LDP has to be prepared in accordance with the Duty to Co-operate and legal and procedural requirements. This is required by Government guidance No ☒
- b. Sound** Yes ☐
To be 'sound' a Local Plan should be positively prepared, justified, effective and consistent with national policy. This is required by Government guidance No ☒
(if you **do not consider the LDP to be sound**, please complete section 2.3. below)

2.3. Do you consider the Maldon District LDP to be unsound because it is not (tick as appropriate):

- a. Positively prepared** ☒
To be positively prepared the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements
- b. Justified** ☒
To be justified the plan must be:
- Founded on a robust and credible evidence base;
 - The most appropriate strategy when considered against the reasonable alternatives.
- c. Effective** ☒
To be effective the plan must be:
- Deliverable;
 - Flexible;
 - Able to be monitored.
- d. Consistent with National Policy** ☒
The Plan must be consistent with Government guidance as set out within the National Planning Policy Framework

On the following pages, please explain why you think the Plan is unsound or not legally compliant, and set out any changes you feel should be made to the Plan to make the Plan sound or legally compliant.

Please note: As there will not normally be a subsequent opportunity to make further representations based on your representation at this stage, please include all the information, evidence and supporting information necessary to support/justify your representation and the suggested change(s) to the Plan. After this stage, further submissions will only be invited at the request of the Planning Inspector, based on the matters and issues the Inspector identifies for examination.

2.4. If you consider the Maldon District LDP to be unsound or not legally compliant please explain why in the box below.

Please be as precise as possible. Please also use this space for any comments in support of the LDP.

There has not been adequate consultation on road infrastructure issues of concern to (notably Hatfield Peverel, Danbury and Little Baddow) Parishes within the Braintree and Chelmsford Districts. Indeed from para.2.67 of the pre-submission Plan it appears they may not yet have consulted neighbouring districts on those issues.

The Plan is not founded on a sufficiently robust and credible evidence base.

It suggests that the options, aspirations and infrastructure requirements and gains would all be deliverable. But, much of the infrastructure requires involvement of other parties such as Essex County Council, Chelmsford Council, NHS, Essex Highways etc and there does not seem to be evidence of active involvement, discussion with and decisions made by all of these agencies. The Plan cannot deliver the infrastructure improvements to the highways network which are essential to the SUSTAINABILITY of the development strategy and is thus seriously undermined.

There are no realistic ways of alleviating already existing problems for the A414 through Danbury, the B1019 through Hatfield Peverel, the B1022 northwards, or routes via the B1018 through Wickham Bishops to the regional rail and road networks. Paragraph 2.67 of the pre-submission Plan now notes that what the LPA consider to be the most effective solution is not deliverable at this time, and no evidence is provided that it would be deliverable in the foreseeable future. And the main assessment into the wider transport implications was not completed until December 2013, meaning that the plan had been produced BEFORE the full impact assessments had been conducted.

There appears no credible consideration or evident regional co-operation regarding transport, road and rail infrastructure, accessibility of airports and regional hospitals. For example, there is no evidence provided of planned co-operation with Chelmsford City Council regarding the increase in traffic on the A414 between the A12 and Oak Corner. Claims for amelioration of local road transport and congestion problems via public transport, walking routes or cycle paths (Paragraph 2.68 and 2.69) are unrealistic and lack adequate evidence base.

The strategy regarding transport is inconsistent. For example, paragraph 7.3 states that 'the Crouch Valley Line provides an opportunity to ease the District's reliance on the private car for transport'. However, the plan involves developing the majority of the houses away from this railway. As a daily user of this line the narrow stretch of the road near the Round Bush Pub would become more dangerous than it is now if the number of commuting road users increases in line with the proposals. Paragraph 7.4 states that 'The Council will

encourage and support proposals which help to provide sustainable access and travel choice for residents of the District'. I do not believe this plan delivers these choices.

The plan appears to contradict recent national policy announcements from the Planning Minister, Nick Boyles suggesting that planners will be blocked from building on areas at risk of flooding. Although the development zones are outside the current Environment Agency flood warning areas, they are very very close so it is incredibly risky if you take into account issues such as sea level rises and the level of run off from this level of development. The fields on which the proposed development is to take place and over which I walk the dog daily have been waterlogged since December. Were they to be concreted over the water will have no-where to go and result in the flood plain being extended in heavy periods of rain.

2.5. Please explain in the box below what change(s) you consider necessary to make the Maldon District LDP legally compliant and sound.

Please be as precise as possible. Please explain why this change will make the Maldon District LDP legally compliant and sound. It will be helpful if you are able to put forward any suggested revised wording of the policies or supporting text.

The residents should be consulted on the options for the whole district.

The plan should be changed to either disperse the growth near the existing train stations or a new settlement South of the district between Woodham Ferrers and Althorne, not just of 1000 houses as indicated in a previous plan, but of all the required houses. This would make the infrastructure requirements more viable.

Consider reinstating a Maldon train station or get an undertaking from Essex Highways that a new relief road to the A12 will be provided within the Plan period. The small relief roads in the current plan are insufficient.

Evidence of co-operation with Chelmsford City Council to look at mitigation measures for the increase in traffic on the A414

Confirmation and detail on improvements in public transport with involvement of Essex County Council.

Agreement that the other infrastructure will be delivered at the right time not at the end of the development when all the houses have been built.

More detail and evidence of commitment by the CCG to expand and build new medical facilities

An analysis of the traffic implications at other key junctions that have not currently been assessed e.g. Acacia Drive / Spital Road and St Giles Crescent / Spital Road. These junctions are overburdened at present and even if the All Saints and Wentworth schools are not expanded the increased volume of traffic on Spital road during school run periods will cause severe congestion.

A realistic approach to the disadvantage of the overburdening of the inadequate transport infrastructure

2.6. Do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations ☒

Yes, I wish to speak to the Inspector at the hearing sessions ☐

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination

2.7. If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.

This is the end of Part 2 (Regulation 19 and 20) of the response form. Please complete this form for each representation you wish to make. You only need to complete Part A once. Please submit all of your response forms together.