

P	S	C					/		
---	---	---	--	--	--	--	---	--	--

Part 2 - Regulation 19 and 20 of the 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 number

2.27

b. Policy reference

S1 II

c. Proposals map

d. Other section (please specify)

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

a. Legally compliant

YES NO

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.

b. Sound

YES NO

To be 'sound' a Local Plan should be positively prepared, justified, effective and consistent with national policy. This is required by Government guidance. If you do not consider the LDP to be sound, please complete section 2.3 below

2.3 Do you consider the Maldon District to be unsound because it is not ... (✓ 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, 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.

P	S	C					/		
---	---	---	--	--	--	--	---	--	--

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.

If the box is not big enough for your comments, please attach another page marked appropriately.

The LDP for Maldon District has a great deal to commend it:

- it is long term
- will prevent ad hoc development
- ensures most infrastructure issues are at least brought into view
- has involved the public
- attempts to be comprehensive in accordance with garden suburb principles

It has explained the positive reasons, such as employment, why the intended development has been deliberately clustered in major groupings near existing settlements, **but** inevitably in adopting that particular strategy it has rightly highlighted the importance of delivering specific **strategic physical and social infrastructure** in addition to the more local infrastructure normally associated with more scattered and small scale housing developments.

Unfortunately, even with the means of S106 and CIL negotiations, we know that Maldon District Council does not have the necessary authority to produce the funding for these essential provisions, or to determine when, if ever, they are provided. Two prime examples are as follows:-

a) Without a railway station, Maldon is dependent on road connections for all but walking and cycling. Connections to the A12 cannot cope with current loads at peak times, and the proposed traffic light in Danbury for example really will not solve the problem! Because the key destination junctions are in Chelmsford and Braintree Districts, not Maldon, the focus of the LDP is too narrow and partial. The impact of the developments on traffic flow therefore needs to be thoroughly and specifically addressed with substantial investment put in hand by Essex Highways to anticipate the significant growth in demand.

A new target measurement should be introduced for peak journey times from say Morrisons to the A12 beyond Danbury, and from an equivalent landmark in Heybridge to the A12 at Witham.

If essential repercussions of the Plan have not been calculated and key requirements for living in Maldon are not measured, it follows the Plan itself is inherently unsound.

b) Whilst traffic jams are bad enough for the local economy and environment, the impact of the LDP in respect of medical issues is even more serious with its potential for significantly increased suffering and even death through lack of local medical attention. If it cannot ensure the delivery of even adequate medical provision for the resident populations of Maldon and Heybridge, it is ineffective, thoroughly unsound, and even unsafe.

Yet the LDP itself confirms in its statistical analysis what residents currently experience, that current medical provision for Maldon is woeful: GP surgeries are heavily overloaded to the extent that appointments are hard to come by even within the booking period, and physical access is poor as the two surgeries are adjacent to each other and landlocked in a cul de sac in the very centre of town. Meanwhile an overdue decision on the community hospital provision is endlessly postponed, and the services at the existing hospital are dwindling.

[Continued overleaf on 2.4b: physical and social infrastructure]

2.4 b Physical and social Infrastructure

At the very least common sense alone dictates that a fixed contingency site is reserved for a potential new hospital until an alternative decision is taken by the health authority (as evidenced by work put in hand on adapting the existing one rather than mere words), and also that sites for a generous new GP practice are established in each of the two proposed garden suburbs to serve those areas and their hinterlands (regardless of whether the NHS and associated bodies specifically now agree - contrary to item c on Page 113.). Incidentally, both these measures once realised would have the added benefit of reducing pressure on central parking, so complementing T item 8 on p.104.

Without the capital and ongoing revenue finance however, the LDP will exacerbate the problem of medical provision to breaking point, for all the existing patients as well as all those new patients in the developing areas.

The monitoring of GP/patient ratios ought to be a subject of regular open public debate. Even then the guideline targets against which these are measured are likely to understate the provision needed: the intended new populations will be skewed towards both the elderly with all their associated and growing medical demands and younger people starting to have their own homes, and therefore possibly starting families.

Unless the various disparate arms of the NHS can be organised to prepare for meeting the likely future demand levels, the very viability of the LDP is itself undermined. Unsynchronised central government policies and targets play a key role here, with different departmental policies not joined up (in particular retrospective measurement of health needs).

We therefore maintain that without the full endorsement of all potentially contributing bodies, and a realistic commitment to provide the funding to preferably precede or at worst synchronise with development, ultimately the LDP is bound to fail in delivering its otherwise laudable objectives.

Many references to that lack of endorsement and commitment are articulated in the Plan itself e.g.P9 'no certainty', p11 'varying levels of engagement', p33 'no planned investment', p37 'public sector capital unlikely' etc.

Certainly for the sake of both the existing and new residents, housing development should not be commenced without that infrastructure in place. **The mismatch for Maldon District Council between responsibility for planning and the requisite authority to deliver needs to be addressed, if necessary by some form of specific joint delivery authority.**

As it is, policy S1 Spatial vision and Development Strategy item 11 on page 14 is far too weak in merely '*seeking to mitigate*' issues with other funding sources.

A joint delivery authority would also have the benefit of monitoring that all the allocated funds were actually spent.

The clustering of the majority of the intended housing makes joint working more feasible, but only if authority is combined to lobby for requisite funds or the lead authority effectively asserted.

As it is, the LDP damns itself by saying in paragraph 2.27 of the Spatial Vision 'without this infrastructure the delivery of sustainable communities will not be possible.'