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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?

- |   |  |
|---|--|
| <p>a. Paragraph<br/>(please specify paragraph number) <u>1.10</u></p> | <p>b. Policy<br/>(please specify policy reference) _____</p> |
| <p>c. Proposals Map _____</p>   | <p>d. Other section<br/>(please specify) _____</p>           |

**2.2.** Do you consider the Maldon District Pre-Submission LDP to be (tick 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 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.

Essex County Council has worked closely with Maldon District Council, and neighbouring authorities to consider the impacts of the Local Plan within the district, and across neighbouring boundaries (NPPF, para 179). ECC has considered the potential impact of the planned growth on ECC functional areas, and areas of responsibility, and to ensure that infrastructure is in place to support current and projected levels of development (NPPF, paragraph 181)

ECC supports paragraph 1.10 of the Local Plan and has been actively involved in the preparation of all iterations of the emerging Local Plan.

ECC has undertaken numerous highway and education assessments participated in duty to cooperate meetings with neighbouring districts (officer and member level), with in particular Braintree District (BDC) and Chelmsford City Council (CCC). These have highlighted cross boundary issues at stages in the Plan's preparation, and resulted in potential solutions being identified. ECC is keen to agree a 'Statement of Common Ground' on Duty to Cooperate (highway issues) with Maldon DC, Chelmsford City and Braintree District prior to submission of the Plan.

Cross boundary issues identified by neighbouring authorities included the following:

1. The potential impact of 300 dwellings at North Fambridge (Preferred Option Plan) on the B1012 and Rettendon Turnpike (A130/A132 junction, near South Woodham Ferrers (issue raised by CCC)
2. Potential impact of additional secondary school pupils attending secondary schools in Chelmsford City (issue raised by CCC)
3. Impact of additional trips from Maldon on the proposed North East Chelmsford Rail Station, Boreham (issue raised by CCC)
4. Congestion on the A414 between Maldon and Chelmsford, particularly in relation to congestion at Danbury – Eves Corner (issue raised by CCC and ECC)
5. Congestion on the B1019 / B1137 junction at Hatfield Peverel (issue raised by BDC and ECC)

Following an assessment of primary school capacity at neighbouring primary schools, and a review of the spatial strategy by Maldon DC the housing allocation in North Fambridge was reduced from 300 to 75 dwellings. This has alleviated concerns of Chelmsford City Council. The catchment of The Plume is relatively self contained, with limited pupils travelling outside of the catchment to secondary schools in Chelmsford.

ECC considered the impact of new development on the NE Chelmsford Rail Station (Wider Highway Network Report, December 2013), and concluded there would be a negligible impact on commuter movements, and any additional traffic could be accommodated within the committed improvements at Boreham Interchange.

The Technical Note titled 'Impact of Proposed Development Sites in Heybridge and South Maldon on Wider Highway Network (December, 2013)' identified and costed potential mitigation at Eves Corner, in the form of 'pre-signals', which would help maintain the free flow of traffic along the A414 strategic highway route. ECC supports the reference to this issue in paragraph 2.66, page 32)

With regards the B1019/B1137 junction at Hatfield Peverel the same report noted that the junction is already a concern at peak periods, and the planned growth will exacerbate this situation. A number of options have been considered by ECC but are not considered a viable short term solution, largely due to a lack of physical space.

ECC will work with MDC to raise the profile of the requirement for a new junction on the A12 with neighbouring authorities, the Highways Agency, the South East Local Enterprise Partnership (SELEP), and

Central Government. Due to the significant costs associated with the implementation of a new junction, strategic improvements to the A12 are beyond the scope of the LDP at this current time. ECC supports the reference to this issue in paragraph 2.67 and 2.68)

**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.

**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.**