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**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

b. Policy reference

S2

c. Proposals map

S2 def.

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.



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**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 consultation document circulated to residents in 2013 (28/8-14/10) indicated that the total number of new dwellings proposed for Heybridge as a whole should be 1000 (900+100). This document was delivered to every home in the district and was therefore brought to the attention of the community. By contrast the Pre Submission LDP indicates that the housing allocation for Heybridge Garden Suburb is now to be 1335. This increase in numbers has not been subject to the same public consultation but presented as a fait accompli and lies in a document which a majority of residents have not accessed. Such practice is undemocratic and says more about the aspirations of the council than their ability to deliver. Supporting documents on viability have not been updated to take full account of the proposed increase in the size of Heybridge Garden Suburb and are therefore inaccurate.

Most of the strategic growth is centred on the increased urbanisation of Maldon, Heybridge and Burnham and no explanation is given as to why other areas or strategies were not adopted. The sustainability of Heybridge Gardens Suburb has not been tested robustly against reasonable alternative strategies. The infrastructure costs for North Heybridge have not been adequately assessed and there is variable advice to MDC as to viability. Sound infrastructure delivery planning has not been demonstrated.

The proposed Heybridge Garden Suburb will subsume the existing settlement of Heybridge and impact significantly on the countryside and as such is in conflict with Spatial Vision 2.4. In the context of transport it is denied that the land in Heybridge is either accessible or appropriate, there being no appropriate road network or rail connection. Policy T1 para 7.7 accepts that optimising rail transport is to be encouraged but this would be fulfilled by the enlargement of Althorne, North Fambridge and Southminster.



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**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.**

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

There should be public consultation on the enlargement of Heybridge Garden Suburb if MDC wish to have the revised figures considered by the inspector. Alternatively the original figures in the public consultation document should be used.

It is suggested that the increased urbanisation of Maldon, Heybridge and Burnham could be dealt with more proportionately by considering alternative strategies such as:-

1. Proportionate enlargement of villages so that local economies could benefit from infrastructure improvements and thus assist with reducing rural deprivation
2. Consider enlargement of settlements at North Fambridge, Althorne and Southminster where there is a rail connection. In particular Southminster lends itself to enlargement and would benefit from improved retail facilities.
3. Reduce the size of the Heybridge Garden Suburb or negate the need to build it altogether.



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**2.6 Do you consider it necessary to attend and give evidence at the hearing part of the examination? (✓ 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**

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

This response is on behalf of the Heybridge Residents Association, which is in its infancy but is being formalised and its membership is increasing. The association considers that it will be of sufficient size by the time of the hearing to warrant being given a voice. I may not personally speak on behalf of the residents Association as another committee member may speak in my stead.

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.

