

Matter 3: Strategic Housing Growth – North Heybridge Garden Suburbs

Issue 1: Whether policies S2, S3 and S4 with their associated text dealing with North Heybridge Garden Suburbs is justified by the evidence, consistent with national policy, and effective

1. Is the strategy for development for these strategic sites appropriate, justified, effective, sustainable, viable, soundly based and consistent with the Plan's strategy?

The LDP contains no really solid evidence that any of the 17 objectives outlined in the SA will be met in any certain or substantial way.

2. Have the requirements for mitigating the Hatfield Peverel B1019/B1137 junction issues been resolved given the updated Statement at DOC95, the County's Briefing Note at DOC104, and the North Heybridge Garden Suburb Position Statement at DOC103? If not, when?

By no means. The claim that "Development proposals can be accommodated within the capacity of the Maldon and Heybridge road network and junctions, and wider network, following appropriate mitigation measures and junction improvements;" (Policy S4 MDLDP page 27) is ill-founded. The present poor communications and its economic consequences as well as to those of quality of life are generally acknowledged (see A12 Inquiry report of May 2008) but MDC from conception through iterative stages have not adequately assessed let alone resolved the issues. A bid for £10m to the SELEP to pay for strategic highways improvements is not thought likely to result in a remedy.

3. I note that the costs of mitigating the highway issues at the Hatfield Peverel B1019/B1137 junction and their timing are not shown on CED10 Appendix 13

4. Are these sites also affected by the necessary highway improvements at Eves Corner at Danbury? Should policy S4 (mention both this and any mitigation measures necessary at Hatfield Peverel)?

We would point out that the sites will be dependent upon transport access southwestwards towards London, as well as westwards through Hatfield Peverel. We would also, as for 'South Garden Suburb' sites, point out that EB004c still does not attempt such assessment on routes to Witham or northward to the A12 via B1018 Wickham Place or Maypole Road/Wickham Bishops or Rivenhall/Braxted Road.

5. Bearing in mind my questions on Matter 1, Issue 3 on SPDs, should any of the information contained in the North Heybridge Garden Suburb Draft Strategic Masterplan Framework (DOC104) be placed in these policies or IDP, particularly policy S4?

We consider that (contrary to the claims in Position Statement DOC103) there are material, in fact crucial, "unresolved" issues. Indeed, looking at the current evidence base, we question that these issues are capable of resolution , but certainly unless such issues are resolved and placed within the Plan as legally constituted they present a threat to a properly planned future for Heybridge and Maldon Town.

6. How much development can take place on each allocated site before a specified piece of infrastructure in CED10 Appendix 13 has to be provided?

7. Much of the infrastructure relies on pooled funds from various sites. Bearing in mind the answer to the above question, will this pooling arrangement prevent the delivery of individual sites if monies are not available for key infrastructure works because other sites have not progressed as fast?

We would also ask how infrastructure which is as yet not adequately specified can be agreed, allocated and secured within the Plan .

8. Are flooding and sewerage issues now resolved? Can any flooding problems be practically and viably resolved? We question whether SUDS schemes, especially in an area of London Clay where the sub soils are largely impervious, are of themselves sufficient to avoid flooding. The provision of water holding areas (flash flood lakes) and the maintenance of drainage pathways into the estuary when tidal levels permit have been of questionable efficacy historically (See 1980's history of expansion of South Maldon and the flooding at Park Drive last year) and given climate change predictions and raised sea levels (See as far back as flood of 6th January 1928 which topped a level which all of current Heybridge iays below*) are likely to remain high risk.

**See 'The Newsmen' report of 14th January 1928 (the water reached the foot of Market Hill (topping the FullBridge 4.2M)*

In respect of sewerage we ask for evidence that sewerage treatment provision will be adequate for the future ecology and enjoyment of the Blackwater SSSI. (We think of the outfalls at Osea and the increased use of beaches there and at Goldhanger for swimming) Has, for instance, the evidence in this respect taken account of the 3,000-4,000 holiday homes around the SSSI. For other infrastructure issues the Plan certainly does not seem to have taken account of this population being in place for all but one or two winter months.

9. CD10 (*sic CED10?*) Appendix 13 shows new healthcare provision, presumably for GP surgeries. Where will these be provided? Please will the Council suggest a suitable consequential modification to policy S4 and paragraph 2.53.

With all the other infrastructure costs emerging for this option for growth the risk of provision of adequate GP services via 'planning gain' proving not viable remains high.

10. DOC103 at paragraphs 2.26 and 2.27 says that there will be a reduced rate of affordable housing for sites S2(e) and S2(f).

The provision of both 'Affordable Housing' according to the NPPF definition (social and subsidized housing) and lower cost market housing of the type needed does not meet the aims of the Plan let alone an objective assessment of the actual of critical regional, indeed national need for those types of housing provision.

14. In the policy S4 general development principles:

a. What new or enhanced public transport provision?

These don't seem to be explained. It is difficult to see how these areas could be served given the proposed so-called "Access and Movement Framework Plan" (see p33 of the Draft SMF/Strategic Master Framework and figures 10-13 inc.) even were a sufficiently supported and utilized bus service viable. The fact that utilization/ diversion of existing bus routes from Maldon to Colchester via the suburbs will make these less attractive and viable by making existing journeys even more time consuming hasn't been taken into account.

b. Is the road network capacity capable of accommodating the developments?

The wider road network definitely is not capable of accommodating the developments for reasons we have given elsewhere. There is no significant strategic highway network proposed to cope with the additional traffic. Furthermore the network is currently congested and only appears to work where there is so called 'rat running'. We would ask what traffic modeling has been done to reflect the actually situation and what modeling has been done to truly represent the actual journeys without rat running? For example what is the reserve capacity of the strategic links? Has there been an Origin and Destination (O&D) analysis for the various zones including residential, business and leisure.

c. What highway mitigation measures and junction improvements?

We consider that the impact of highway junctions and plethora of roundabouts is now being assessed without due regard to the cumulative effect. A site by site assessment and provision, largely developer led, risks neglect of this along with wider economic and quality of life issues. Insufficient research and objective thought has been given, by the Planning Authorities, to traffic movement and loads given the increase in population.

d. What form and scale of community hubs and local centres are needed?

The space allocated in the SMF barely enough for a few convenience shops nor convenient enough for the housing areas in total even though these are also beyond the distance people could feasibly be expected to walk to conveniently utilise actual Town Centre facilities. The area will be devoid of many of the features of social infrastructure (places of gathering and meeting such as pubs, churches, village halls as well as corner shops or post offices)

e. What and where is the green infrastructure and youth and children's facilities?

The description of the by-pass as a green corridor "which will contribute greatly to the character of the area, creating habitat and attractive routes for people and wildlife" (para 5.11 of the SMF) is absurd. How will the landscape be given greater character than it has, what habitats would it provide and where will the wildlife and people en route not be at odds with each other?

f. What is meant by adequate provision for affordable housing?

Is it not already emerging that the affordable housing need, if the Council's own assessment of 40% is taken as adequate provision, is not going to be met here or elsewhere in the LDP? Is there an objective assessment of the really critical areas of housing need (smaller, lower cost market housing for the young or other starter households, for older people downsizing or others of changed circumstance) and isn't it emerging that the Plan will not ensure such need is met?

g. What proportion of housing for older people?

Are these suburban fringes, arcadian 'gardens' or not, going to be attractive to, or function well for people wanting to down-size and move nearer to central facilities and services; and perhaps a more immediate social infrastructure?

16. Will these development sites have any adverse impact on Heybridge Woods? Are these woods an 'ancient woodland'?

Yes; because the ancient woodland remnant will be enfolded in a residential suburb and the impact of that, and any adverse affect weighed objectively in the balance, requires independent expert assessment. Where has this been carried out?

17. Does the Housing Mix (policy H2) need altering to make the sites viable? If so, how?

Given the demanding infrastructure requirements, and in the absence of specific prior assessment of viability, there is a significant risk that provision of the desired housing mix (providing the types of houses actually needed) will, in the event, be found not viable.