



**Mr Adrian Tofts
Strategic Planning Manager
Maldon District Council
Princes Road
Maldon
Essex CM9 5DL**

Dear Mr Tofts,

Maldon District Local Development Plan Consultation

We refer to your invitation dated 16th September 2016 to comment on the latest documents offered for consultation relating to the Maldon District Local Development Plan (LDP).

For your convenience, we shall restate here our entire view, without reference to comments previously submitted. In essence, we have seen nothing in the new documents to reassure us regarding the impact of development as set out within your LDP upon congestion at Eves Corner, Danbury and thus upon the residents of Danbury and Little Baddow. Furthermore, aspects of the emerging Chelmsford LDP could imply significant potential exacerbation of that congestion.

We consider that without radical road transport infrastructure improvements the impact of the proposed Maldon District LDP upon Danbury and Little Baddow will be severe and unsustainable.

This is for the following reasons:

1. The traffic modelling figures offered by Essex Highways (EH) are self-evidently flawed. EH themselves admitted in submission to Mr Vickery, Planning Inspector, early in 2015 that the model –
 - 1.1. is based upon limited experience with pre-signalling
 - 1.2. is unreliable when 100% capacity is exceeded.Furthermore -
 - 1.3. it delivers results that are illogical (for example, that when the Maldon/Heybridge development is added to the 2026 background traffic level the model indicates that the traffic delays reduce on Little Baddow Road).
 - 1.4. The data used in the model is inconsistent with observational data provided by Highways whose observed data for October 2013 on this road was 5 times that used in the model for the base layout.
 - 1.5. If the model's predictions are accepted and the impact on residents and roads in Little Baddow is discounted, we consider that the increase that the model predicts in A414 peak time traffic queueing is clearly severe: an increase in the

Woodham Walter, along Spring Elms Lane, Holybread Lane and Hammonds Road. To reach either of these destinations the time needed is less than the time EH's model predicts it will take to reach either of these locations using the A414 through Danbury.

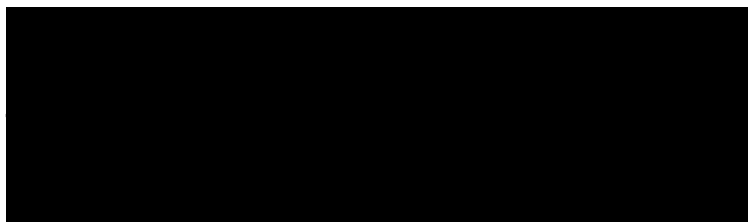
- 3.4. Currently under consideration, and not discounted at this stage, are potential SLAA sites in East Danbury assessed within Chelmsford's LDP as having an aggregate yield of 1092 homes. While of course many of these sites may eventually be discounted, any that are taken forward will further add to the congestion at Eves Corner, with inevitable increase in delays and consequent additional inducement for rat-running.

We submit, therefore, that there are multiple effective opportunities for rat-running that EH has failed to consider. Each of the routes mentioned except for that to Eves Corner involves travel along sections of Protected Lanes. Chelmsford City Council's *adopted* LDP contains a Policy (DC15) which states that any proposals which would give rise to a material increase in the amount of traffic using Protected Lanes will not be permitted.

In your document "Maldon District Local Development Plan – Schedule of Main Modifications", your modification Ref 117 includes the statement: "In relation to the A414....Maldon District Council will support Essex County Council by identifying further mitigation measures within the Infrastructure Delivery Plan, and where appropriate will require specific strategic highways improvements as developer contributions or for inclusion within the Council's CIL Regulation 123 list". Given the severe impact on peak time travel through Danbury already reflected in EH's model, if further mitigation measures were indeed identifiable we can only assume that they would have been described and even scheduled. We can envisage no such opportunities without diversion of significant peak time traffic loads away from the Eves Corner junction. Accordingly we consider that it is essential to provide either (a) an A414 overpass at Eves Corner or (b) a bypass around Danbury or (c) a congestion-free new access from Maldon to the A414 at Hatfield Peverel. Your LDP Modification referenced 012, para 2.71 indicates that the last of these is viable but at significant cost.

Unless one of these solutions can be assured of early delivery, The Little Baddow Parish Council consider that the Maldon LDP remains unsound because of the severe and unsustainable impact that it will have on the A414 at Danbury and adjacent minor roads in Little Baddow.

Yours sincerely,



The Little Baddow Parish Council object to this planning application on the following grounds.