



Heybridge Residents Association

17th October 2016

Mr A Tolts,
Strategic Planning Manager
Maldon District Council,
Princes Road,
Maldon CM9 5DL

Dear Mr Tolts

,

Re. Response to LDP Amendments and supporting Documents

Please take this letter as the formal response of Heybridge Residents' Association to the Amendments proposed to the Development Plan which is currently being considered and has been put into the public domain for consultation. We have commented below on three specific documents where our referencing coincides with the original documents.

EB106

This document deals with the "Objectively Assessed Housing Needs" (OAN). After much consideration of statistical evidence, it states in para 39 "this would suggest an OAN of 260 homes a year 2014-29. That should be taken as the most up to date OAN". This statement would at first sight appear categoric but para 40 then fudges the issue and effectively states that 260 is close to 280 so let's consider 280. It then qualifies the matter further by stating that there could be an "argued" influx from London so let's stick to 310. The OAN takes no account of a potential "argued" downturn in numbers due to Brexit and possible reductions in immigration. Surely the arguments are nothing more than that and as such should carry little weight.

Having proven by statistical means that the OAN should be 260 why change it to 310 i.e. over 19% on a whim ? The original Pre-submission LDP used a figure of 294pa



Heybridge Residents Association

so surely Policy S.2 should now be re-drafted on the basis of 260pa. This would reduce the pressure on communities to expand to the proposed degree.

The saving of 50 dwellings pa amounts to 700 dwellings (2014-2029) which is almost the size of the original NHGS or more than half the currently proposed number of dwellings. This is a significant number. We would therefore assert that the figure of 310 dwellings pa is being adopted to simply bolster MDC's current ill-conceived policy for strategic growth and placate the new Planning Inspector.

We would ask why go to such lengths to analyse data and then ignore the outcome?

EB.107

REF	POLICY	COMMENT
098	S2 Strategic Growth	The planned minimum number of dwellings 2014-2029 is now 4650 based on 310pa. Document EB106 makes it clear that the most accurate OAN is 260pa i.e. a total of 3900 dwellings in the period 2014-29. If 260 pa is adopted then 043 and all similar tables require amendment with a projected downward review.
088	Strategic Growth	Here it is accepted that there are significant infra-structure constraints in the District and therefore a reduction in the OAN to 260 should come as welcome relief.
078a	Strategic Growth	The abandonment of Reserve Sites is welcomed.
076	2.21-2.24	The OAN is 260 not 310. At the original EiP MDC were criticised for not using current data. They are now doing so and this has produced an OAN of 260.
108	Maldon and Heybridge Strategic Growth	A new relief road is proposed for N. Heybridge but there is no stipulation as a matter of policy that it will be completed before the proposed NHGS is commenced or the estate reaches a certain size eg. must be completed before 200 dwelling are occupied.

The country park has been scrapped. This was one of the few benefits to existing residents of Heybridge if subjected



Heybridge Residents Association

		to NHGS on their doorstep.
100	Ditto	The strategic flood alleviation scheme (SFA) has been scrapped as a condition of building NHGS. This was the only major benefit to existing residents in the event that NHGS reached fruition. Now that it has gone as a mandatory requirement so has any semblance of logic in building NHGS.
059	Ditto	This is welcomed.
005	Ditto	This is welcomed.
101	2.59	The use of the word “should” in this paragraph gives small comfort to the residents of Heybridge who suffer from periodic surface water flooding. In our view this policy should be mandatory. For example, the policy could make the provision of the SFA scheme mandatory in advance of development without implicating any particular funding stream. As stated earlier the SFA scheme is the only major benefit of having NHGS foisted on the existing residents.
117	2.70	This is factually incorrect. No meaningful improvements have been made to Eve's Corner. There are no priority traffic lights installed.
012	2.71	The abridged version is that nothing will be done to improve traffic flows in Hatfield Peverel unless funding for a link road can be obtained which in the current economic climate is unlikely. Residents of Maldon/Heybridge will simply have to put up with delays and likewise residents of Hatfield Peverel will be subjected to increased pollution and congestion. Major developments are being pursued in the District despite the fact that there is only one 'A' road in the whole of Maldon.
094	2.91	It seems ironic that the provision of 75 dwellings in North Fambridge has been scrapped and yet this area is one of the few in the District to benefit from a train service. Is this tied in with 064 i.e. protecting Prosperous Rural Communities? It is worthy to note that North Fambridge is favoured in doc EB108A
021	D5	There should surely be a mandatory requirement to have regard to the various strategies for dealing with flood risk. The policy as currently worded is not mandatory.
022	3.48	The words “the Council will seek to avoid inappropriate development in areas at risk of flooding” are far too woolly as there should be an outright ban on any such



Heybridge Residents Association

		developments especially in view of the increasing effects of climate change. The words “seek to avoid” are meaningless.
099	H1 Affordable Housing	The increase in affordable housing in the proposed NHGS (if persued) from 25 - 30% is welcomed.
124	5.4	This policy will encourage the construction of small elite developments and simply serves to benefit prosperous rural communities. To encourage the provision of affordable housing it would be beneficial for all developments regardless of size to make a financial contribution towards such housing. As currently worded the proposed policy will ensure that affordable housing is kept well away from affluent areas . Housing policy should encourage diversity and not put obstacles in the way
107	8.10	There is a vast difference between 'bringing an opportunity to deliver a flood alleviation scheme' and actually providing one. These words bring little comfort to the residents of Heybridge. We are aware that the legality of making it obligatory for the proposed developer of NHGS to provide an SFA scheme, was challenged at the first EiP but we were assured that an SFA would be mandatory at the consultation stage by the EA. If the ill-conceived NHGS proceeds then greater assurances and safeguards are required. “Bringing an opportunity” are weasel words that are ripe for interpretation especially if the opportunity doesn't arise.

EB 108A

Para 6.31. This paragraph deal with the Alternative Site Assessment and lists only 7 sites as resulting in “significant or potentially significant impacts and notable failure of



Heybridge Residents Association

sustainability objectives". As 54 sites were assessed this implies that 47 Alternative Sites are sustainable or potentially sustainable.

Of these 47 sites the following are in areas where we consider development is more appropriate than North Heybridge due to the existence of rail transport and/or suitable topography.

- S.11 North Fambridge (850-1250 dwellings)
- S.30 Southminster
- S.31 Althorne
- S.46 N. Fambridge
- S.51 Southminster
- S. 5 Latchingdon
- S.18 Latchingdon
- S.19 Althorne
- S.23 Latchingdon
- S.32 Purleigh
- S.41 Purleigh
- S.25 Stow Maries

As so many sustainable or potentially sustainable sites are available in areas with a rail link and/or suitable topography (thus not requiring an SFA scheme), we question why MDC are fixated on Garden Suburbs in Maldon & Heybridge. A more balanced approach to the provision of housing in the district is available, as amply demonstrated in this document (EB 108A).

The Council seem determined to follow their member's inclination to foist increased urbanisation on the residents of Maldon & Heybridge when suitable alternative strategies are available that spread the benefit and burden of development across the District. It is particularly relevant that some of the Alternative Sites have a rail link. Site S.11 in North Fambridge for example is capable of providing 850-1250 dwellings and as such, it's development could either negate the need for NHGS or allow both proposed Gardens Suburbs to be halved in size.



Heybridge Residents Association

We believe that the proposed creation of Garden Suburbs can no longer be sensibly supported. We consider that they have been pursued by members of the Council in order to minimise the impact of development on the more rural areas of the district which include affluent villages in which influential people tend to live. In other words a severe case of nimbyism.

Conclusion

At this late stage we would urge MDC to re-consider their aspiration to create NHGS on the basis of poor infra-structure and a reduced OAN. They may also wish to acknowledge that they have hitherto adopted a blinkered strategy for growth that has sent them down the route of increased urbanisation for some residents whilst maintaining rural idylls for others.

Yours sincerely,

DG Sargood (on behalf of Heybridge Residents' Association).