



3278.

60 Holloway Road  
Heybridge  
Essex  
CM9 4SQ

FAO David Coleman  
Maldon District Council  
Princes Road  
Maldon  
CM9 5DL

## **Maldon District Council Draft Local Plan 2014-2029**

### **Letter of representation**

Dear Mr Coleman

We reside at No. 60 Holloway Rd and have been formally consulted on Maldon District Council's Draft Local Development Plan 2014-2029. Set out below are our representations to the Plan. We know that the Council has prepared a questionnaire but we feel this is too structured and does not allow us to set out our concerns. Therefore our formal representation is this letter.

#### **The Council's Strategy**

By reason of the National Planning Policy Framework (NPPF), we are aware of the LPA's requirement to meet its objectively assessed need. With this in mind, we understand why the housing target has increased from 3,000 to 4,410 dwellings. However, we have serious concerns regarding the distribution of housing in Heybridge and Maldon.

#### **Flooding**

A total number of 1,000 dwellings are proposed at Heybridge, with 900 located to the north of Holloway Road. At present, the areas immediately around Holloway Road are predisposed to flooding. During the most recent August Bank holiday weekend heavy rain fell and many of the properties along Goldhanger Road and Hall Road flooded, as well as Bents Shopping Centre. Given this, we are extremely concerned that local flooding issues will only be further exacerbated through the construction of 900 dwellings. The fields to the north of Holloway Road act as a natural drainage system and we would question where the water will go if they are completely built upon?

The North Essex Catchment Flood Management Plan 2009 (NECFMP) prepared by the Environment Agency sets out preferred actions for flood risk management over the next 50 to 100 years. For Heybridge, where the level of flood risk is moderate to high, the identified actions, amongst other things, are to develop a flood risk study and for the local authority to develop policies for new development and regeneration to incorporate resilience measures so that the location, layout and design of development can help to reduce flood risk. It is felt that both of the above actions need to be undertaken prior to the submission of the Plan to the Secretary of State. It is too late if left to the Masterplanning stages after the Local Plan has been adopted.

There is no evidence base work that specifically relates to flooding/flood risk management and the new Garden Suburb. It is considered that this is a key piece of evidence required to justify this allocation. Given Heybridge's susceptibility to flooding, as set out in the NECFMP, it needs to be clearly demonstrated that the Heybridge Garden Suburb is in fact deliverable and that flood risk is properly taken into account in the planning of the growth and development of the District. Essentially, the Council, the Inspector and members of the public need to be satisfied that the Heybridge Garden Suburb can be delivered without adversely impacting upon the existing and future residents of Heybridge. Merely saying that the strategic development in Heybridge provides an opportunity to reduce flooding and divert surface water flooding away from the urban area (para. 2.54) does not go far enough.

When we attended one of the consultation events on 12<sup>th</sup> September, we asked one of the Officers the developer costs for flood mitigation. He didn't have any costs and said the Council didn't know what they would be. It is an unknown cost because the relevant work has not been undertaken. As residents, we want specific and deliverable flood mitigation measures identified before the Plan progresses any further. Flooding is a serious issue in Heybridge and the Draft Local Plan does nothing to address it and instead seemingly ignores the fact that 900 more dwellings are going to make the problem worse.

### Traffic

The location and number of dwellings proposed in Heybridge and Maldon raises concerns in terms of traffic flow and congestion. The Assessment of Impact of Proposed Development Sites in Heybridge, South Maldon and Burnham-on-Crouch on Highway Network sets out the junction assessment results, looking at existing conditions and the future conditions with the proposed developments. For many of the junctions modelled, the results suggest significant congestion issues and the need for considerable mitigation measures, particularly at Limebrook Way. On the Limebrook Way junction, even with mitigation measures and a new relief road, it is questioned whether this junction will be able to cope with the inevitable increase in traffic by reason of 1,710 dwellings. The new relief road would not be for the benefit of the residents of these dwellings – access to the new properties is likely to be to the east of the junction. Given that this junction is almost at capacity now, it is realistic to conclude that it will be able to accommodate 1,710 more dwellings without causing extensive delays and congestion problems? We think not.

In terms of the Heybridge development, assumptions have been made on trip assignment. In contrast to the December 2010 study, suddenly all development trips have been assigned to the proposed link road. There is no explanation why this has occurred. Obviously, by assigning all the Heybridge development onto the proposed link road, the results of the study will inevitably show a reduction in traffic flow on Holloway Road during peak periods. Again, how has it been decided that now all development trips are assigned to the link road? It is felt that this assumption conveniently skews the results in favour of the development without any consideration to the residents of Holloway Road. To assume that none of the residents of a 900 dwelling development will not use Holloway Road is fanciful.

### **Conclusion**

We understand that Maldon District needs to grow and develop over the next 15 years. However, we also know that paragraph 158 of the NPPF states that LPAs should ensure that their Local Plan is based on adequate and up-to-date evidence about the economic, social and environmental characteristics and prospects of the area. At present, we feel that the evidence to support the Council's Draft Local Plan is, at best, lacking in certain areas and at worst, completely absent. To meet the test of soundness, a Plan must be justified based upon proportionate evidence. We request that prior to the submission of the Plan for

Examination, a comprehensive study on flooding and flood risk management is undertaken in respect to the Heybridge development. Also we feel that further traffic work is needed so the real impact of the development of the District can be understood. Both these pieces of work should be available for public scrutiny and comment prior to the Council progressing further in preparing its Local Plan. Otherwise it could be argued that the public has been unduly prejudiced and the Local Plans process has not met the relevant legal and procedural requirements.

Yours sincerely,



Mr and Mrs Miles