

# TENDRING COLCHESTER BORDERS GARDEN COMMUNITY JOINT COMMITTEE

18 JULY 2022

## A.1 DEVELOPMENT PLAN DOCUMENT (DPD): REPRESENTATIONS RECEIVED IN RESPONSE TO THE REGULATION 18 CONSULTATION AND NEXT STEPS

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### PART 1 – KEY INFORMATION

#### PURPOSE OF THE REPORT

To report to the Tendring Colchester Borders Garden Community Joint Committee, some of the notable issues raised in the representations received from the public and other interested parties to the consultation on the first draft Development Plan Document (DPD) i.e. ‘the Plan’ for the Garden Community under Regulation 18 of the statutory plan making process.

Also to highlight, for information, particular issues raised in the representations that may require the Councils to consider changes to the Plan, undertake or commission further work or analysis to inform possible changes for the Committee’s consideration.

This report does not seek to provide an account of each and every comment raised through the consultation – however the Councils are required to have taken all responses into account in progressing to the next stage of the plan-making process.

#### EXECUTIVE SUMMARY

Public consultation on the first draft of a Plan for the Garden Community commenced on 14<sup>th</sup> March and closed on 25<sup>th</sup> April 2022 – during which Officers held a number of face-to-face engagement events, which were attended by around 180 visitors.

The Councils received responses from 193 individuals or organisations, raising approximately 620 comments on different elements of the Draft Plan. All the representations were published on the Garden Community engagement website in June 2022 for public view – allowing interested parties to see what others have said in full. See: [Comments from the Draft Plan Consultation | Creating a Place for Life \(tcbgardencommunity.co.uk\)](#)

As part of the statutory plan-making process, the Councils are required to take the representations received at the Regulation 18 stage into account when preparing the final version of the Plan for the Regulation 19 stage, when the Plan will be published for a further round of consultation and submitted to the Secretary of State to begin the independent examination process.

The issue of green buffers between proposed new development as part of the Garden Community and neighbouring settlements has been raised as a concern. Almost half of all responses received, mostly from local residents from the Wivenhoe area, have written in objection to the prospect of

development taking place on land south of the A133 as indicated for the expansion of the University of Essex in 'Approach B' in the Draft Plan. However, the representations from both the lead developer, Latimer, and the University argue that neither Approach A nor B is appropriate and that more land is going to be needed for development, potentially south of the A133. The Community Liaison Group have put forward an alternative approach, and other community related organisations, such as Town and Parish Councils, have expressed strong views. Officers will need to review and consider the planning issues involved and are not in a position at this stage to recommend any specific changes to the Plan, but will undertake and commission further work to ensure any decision on this matter is informed by evidence.

A notable number of respondents have also objected to Approach B in respect of potential Knowledge Gateway expansion north of the A133 extending onto the sensitive slopes around Salary Brook. There is, however, a general acceptance from most parties, including the University, the developers and Officers, that the slopes of Salary Brook should be protected from development in any Plan going forward.

A number of residents have called for more protection for Crockleford Heath and the land around Bromley Road. Some suggest that a 'buffer' zone is required between existing properties and any new development, others indicate that the boundary of the designated 'Area of Special Character' does not properly reflect the extent of the community that requires protection, or that the policy is unclear as to how the area will be protected. Some property and landowners in the Crockleford Heath area have however indicated that they would rather be part of the development than be surrounded by it. Essex Place Services have been commissioned to undertake a character appraisal of Crockleford Heath which can help inform any decisions going forward.

The proposed Rapid Transit System (RTS) has attracted a fair amount of interest with people keen to understand more detail around how it will operate, what route it will take and how 'modal shift' will be achieved. The separate report A.3 provides an update to the Committee on progress with the RTS and further work will be needed to fully understand the integration of this important piece of infrastructure into the final proposals.

Some respondents argue that the Draft Plan should have been accompanied by an updated Infrastructure Delivery Plan (IDP), viability assessment and other evidence for the consultation to have been meaningful. The evidence-base will continue to be developed to inform decisions going forward (see separate report A.2 for more information).

Others have raised concern about the level of detail contained within the Draft Plan, either that it is too aspirational and lacks key detail; or that it is too detailed and complex for the public to understand. Some also criticise the general approach to consultation and in particular the quality and limited number of maps and diagrams that were included. Officers are considering alternative ways to present and enable effective consultation on the material at the next stage in the process.

There remain a number of respondents that challenge the need for the Garden Community altogether and who argue that the development should not go ahead at all – but the majority of comments are constructive, with people keen to ensure the development is successful and genuinely meets with Garden Community principles.

People are particularly keen that the development is infrastructure led and does not result in existing infrastructure, services and facilities being overwhelmed; that it achieves a high level of energy efficiency; that it delivers high quality architectural and urban design; and that it protects existing historic and natural assets and incorporates high quality open spaces.

Officers are working on responses to each of the representations, which will be published as part of the evidence base when the Committee is presented with a new version of the Plan for its approval prior to a final round of consultation and submission to the Secretary of State (Regulation 19 stage) to begin the process of independent examination. The purpose of this report is to provide an initial overview of the main issues raised in the representations and to highlight areas where either Officers are likely to recommend changes to the Plan or where further work or evidence is required to inform a future decision on the best way forward for the final draft.

At this stage, the Committee is asked only to note the matters raised through the consultation exercise and to acknowledge that, given the nature of the comments, difficult decisions are likely to be required when it comes to agreeing a final version of the Plan for consultation and submission to the Secretary of State.

#### **RECOMMENDATION**

**That the Tendring Colchester Borders Garden Community Joint Committee notes the content of this report; the issues raised in response to the Regulation 18 consultation on the Draft Plan; and the various matters that Officers will be seeking to address in working towards a revised version of the Plan for consideration by the Committee at future meetings.**

## **PART 2 – IMPLICATIONS OF THE DECISION**

#### **DELIVERING PRIORITIES**

The Committee, at this stage, is only being asked to note this report and its contents and is not being asked to make a decision as to the future content of the Plan for the Garden Community. Members are however reminded that the Tendring Colchester Borders Garden Community is included in the adopted Section 1 of Local Plans, forms an important part of accommodating future housing and economic growth, and is a corporate priority for all three of the Councils represented on the Committee.

#### **RESOURCES AND RISK**

The Regulation 18 consultation exercise was carried out jointly by Officers from Tendring District Council, Colchester Borough Council and Essex County Council with support from the jointly-funded

project team which includes a specialist consultant from Hyas. The collection, registration and analysis of the representations has been, and will continue to be, carried out by this joint team.

The responses received will not only have a bearing on the next version of the Development Plan Document (DPD) but will also inform the next stages of the masterplanning process which, itself, will inform the DPD and the more detailed planning of the Garden Community. To date, the comprehensive masterplanning process has been led by Prior + Partners with specialist support on transport and infrastructure, managed through the joint project team with valuable input from the community and other stakeholders via a varied programme of engagement activities. The masterplanning work and other elements of the evidence base have been commissioned and will continue to evolve. This work is jointly funded by the Councils through agreed budgets.

The greatest risk posed by the responses received to the Regulation 18 consultation is the prospect that the Councils cannot reach an agreed position on how to reconcile the different positions of the community, the University and the lead developers or that whatever position is reached results in further objections, which will have to be resolved through the examination process by the government-appointed Planning Inspector. To minimise the potential impact of such a risk, it will be important that any decisions the Councils take in agreeing a way forward at Regulation 19 stage is informed by the best available evidence.

The nature of any objections might also pose a risk to the timetable for the overall delivery of future economic growth, new homes and associated infrastructure. Because Section 1 of the Local Plans requires that planning permissions are not to be granted until the DPD has been completed and adopted, a delay to its adoption would have a knock-on effect to delivery on the ground. Furthermore, the grant of HIF funding for the Rapid Transit System and Link Road is predicated on the delivery of new homes at the Garden Community by March 2025, which could be impacted if significant delays are incurred. It should be noted that ECC is currently in negotiations with Homes England on extending the completion date of the A120/A133 Link Road.

## **LEGAL**

The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) make provision for the operation of the local development planning system including, for the purposes of this report, regulations relating to the preparation, publication and representations relating to a Local Plan or Development Plan Document and the independent examination. At this 'preferred options' stage, Regulation 18 required the authorities to notify relevant bodies and individuals of the Plan being prepared and to invite them to make representations on the Plan and what it does, or ought to contain. The authorities are now required to take those representations into account in progressing the Plan to the next stage.

## **OTHER IMPLICATIONS**

**Area, Ward or Divisions affected:** The Garden Community development will affect land within both the district of Tendring and the borough of Colchester, associated ECC Divisions and the

corresponding local electoral wards of Elmstead Market, Ardleigh, Greenstead and Wivenhoe. However, the economic, social and environmental impacts of the development are likely to be felt, directly or indirectly, over a wider area – as reflected in its status as a strategic proposal in the shared Section 1 of the CBC and TDC Local Plans.

**Consultation/Public Engagement:** See the remainder of this report for information about the Regulation 18 public consultation undertaken for the Draft Plan for the Garden Community.

**Equality and Diversity:** The Draft Plan for the Garden Community contains policies aimed at promoting inclusiveness, equality and diversity. It will be important for the Councils to give careful consideration to all the comments received at the Regulation 18 stage and in drafting a revised version of the Plan for the Garden Community for the Regulation 19 stage, ensuring that the Plan continues to meet obligations around equality and diversity.

**Crime and Disorder:** The Draft Plan for the Garden Community aims to deliver a new community that promotes employment, skills, and training opportunities as well as health and wellbeing. Its policies require design and architecture to minimise the opportunities for crime and working with Essex Police in the drawing up of detailed plans. It will be important for the Councils to give careful consideration to all the comments received at the Regulation 18 stage and in drafting a revised version of the Plan for the Garden Community for the Regulation 19 stage, ensuring that the Plan continues to address issues around crime and disorder.

**Health Inequalities:** The Draft Plan has been drawn up through engagement with colleagues in the NHS and ECC Public Health, and policies within it promote health and wellbeing and embed the healthy new towns and active design principles. It will be important for the Councils to give careful consideration to all the comments received at the Regulation 18 stage and in drafting a revised version of the Plan for the Garden Community for the Regulation 19 stage, ensuring that the Plan continues to address issues around health inequalities.

## **PART 3 – SUPPORTING INFORMATION**

### **THE REGULATION 18 CONSULTATION EXERCISE**

Following the resolution of the Tendring Colchester Borders Garden Community Joint Committee at its inaugural meeting on 21<sup>st</sup> February 2022, public consultation took place on the Draft Plan for the Garden Community in line with Regulation 18 of the statutory plan-making process. The consultation period lasted six weeks from 14<sup>th</sup> March to 25<sup>th</sup> April 2022.

Acknowledging valuable input from various individuals, community organisations and the Community Liaison Group, the Draft Plan consultation endeavoured to make the process as simple as possible to engage with. The Draft Plan was presented in full in various digital and non-digital formats. Online it was also presented by individual chapter – allowing the public and stakeholders to either comment on the Draft Plan as a whole, or just by the chapters they felt most interested in.

Each policy in the Draft Plan had a short summary film, for those that wanted to understand the policies – without necessarily having to read them and all pages on the engagement website, where the Draft Plan Consultation was hosted, featured a glossary of terms and a ‘jargon buster’.

Drop-in events were hosted in Greenstead, Ardleigh, Elmstead Market and Wivenhoe to enable the public and stakeholders to speak to planners in advance of making any representations. Each area had two events, at different times of the day, to allow flexibility for those wanting to attend.

In addition to the drop-in events, video call or telephone call appointments were made available to ‘Speak to a Planner’.

Interested parties were invited to make written representations on the Draft Plan. This could be done via the engagement website, via email to either Local Planning Authority, via Freepost letter, or via paper comment form. In total, the Council received 193 individual submissions from a variety of stakeholders and interested parties raising around 620 comments on different aspects of the Draft Plan. Following the close of the consultation period, Officers have registered, sorted and read through the comments made and in June all of the representations were published in full on the Garden Community engagement website – enabling anybody to see what each of the respondents had said.

#### **KEY ISSUE: GREEN BUFFERS AND LAND SOUTH OF THE A133**

The most notable topic of comment, to which almost half of all the registered responses relate, is the agricultural land south of the A133 and what development, if any, might be allowed to take place in that location. The Committee Members will recall that the masterplanning work on spatial options published as part of the evidence base had considered three options proposing different approaches to development with varying implications for the land north and south of the A133. From those options, the Councils presented two preferred approaches put forward for consultation in the Draft Plan based upon Option 3 and a variation on Option 3 (the Option 3 Alternative) from the spatial options work. In the DPD, ‘Approach A’ proposed no built development south of the A133 and the protection of that area of land as a Strategic Green Gap (where only certain acceptable uses would be permitted); whereas Approach B identified some of the land south of the A133 (around 11 hectares) for the expansion of activities at the University of Essex, with the remainder of that land still protected as a Strategic Green Gap. Both approaches were considered to provide green buffers (in addition to open space beyond the site boundary and urban edge of Wivenhoe), but of varying extents.

These alternative approaches to development in and around the southern areas of the Garden Community area of search have attracted a significant number of representations from residents – mainly in objection to Approach B and development south of the A133; together with representations also from Wivenhoe Town Council, Alresford Parish Council, the Wivenhoe Society and other community organisations (including the Community Liaison Group). Natural England and the Essex Wildlife Trust have also expressed preference of Approach A over Approach B. The main concerns

raised about development south of the A133 are about unrestricted sprawl of development towards Wivenhoe and the potential for future coalescence (merging) of the Garden Community with the existing town and damage to its individual character and countryside setting. There are also concerns about the wider impact of the development on Wivenhoe's infrastructure and traffic on the local road network.

The University of Essex and Latimer/Mersea Homes (the lead developer for the Garden Community and who control the majority of the land), have objected to Approaches A and B and argue that more (not less) land, including land south of the A133, is going to be required for development.

The University's representation argues that the Draft Plan makes insufficient land available to meet its ambitions for future growth and for the Garden Community to meet the full potential for growth in research, development and knowledge-based industries to bring new jobs to the area for both future and existing communities. The Draft Plan makes provision for 11 hectares of land for University expansion and 4 to 8 hectares for knowledge-based employment activity – however it is the University's assertion that up to 35.5 hectares for its own expansion and 13 hectares for associated knowledge-based employment will be required to meet its ambitions. The University's preference for knowledge-based employment land is for it to be located north of the A133 with strong pedestrian connectivity across the A133 to the existing Knowledge Gateway.

Latimer/Mersea Homes, the lead developers, is more explicit in its objection to the Councils' preferred Approach. It argues that neither Approach A nor B will make sufficient land available to accommodate the 7,500 to 8,000 homes suggested in the Draft Plan at an appropriate density that incorporates the flexibility needed to protect key environmental features and assets. To resolve this matter in part, the developer argues that land south of the A133 is needed for development and that it would accommodate both the land requested by the University for its expansion (for student accommodation), land required for knowledge-based employment, and for additional sports facilities associated with the University. In total the developers are requesting up to 48.5 hectares of land to be included south of the A133 and have proposed an alternative key diagram within their representation to accommodate the various uses.

The Community Liaison Group do not support Approach B and put forward an alternative layout to accommodate knowledge based employment and University expansion north of the A133, but further away from the ridgeline at the top of the Salary Brook slopes.

Clearly there are a number of opposing positions on the future development of land in the southern part of the Garden Community area of search and south of the A133 from equally important stakeholders, each with a critical interest in the project – namely:

- 1) the neighbouring Town and Parish communities – which will be most affected, physically and environmentally by the development and who are understandably concerned about its impacts;

- 2) the University – which is a key provider of employment and an important driver of economic activity in the local area and the wider region which has ambitious plans for the future that (if delivered in full through the Garden Community project) could strengthen the contribution the University makes to the local economy and the job prospects and life opportunities for the wider population and future generations; and
- 3) The lead developer Latimer/Mersea Homes – who control the majority of the land, will be responsible for bringing forward more detailed proposals and which, to a large extent, will shoulder the burden of responsibility of delivery on the ground that meets the community's high expectations and which will therefore be anxious to ensure the development will be economically viable.

Officers are not in a position at this point in time to make any recommendation to the Committee as to how these three positions are best reconciled. Instead, Officers are to give these issues further consideration and will consider the findings of additional evidence gathering including further work on masterplanning & landscape capacity, the economic potential, viability and robustness of the University of Essex's growth forecasts and land requirements to ensure that any decision going forward is properly informed by evidence.

#### **KEY ISSUE: SALARY BROOK**

From the responses received, there is general support across the board for the establishment of a Country Park at and around Salary Brook Local Nature Reserve and Churn Wood. The consultation responses have however raised a considerable number of comments about the prospect of development potentially extending on to the sensitive slopes around the brook - a particular issue in regard to Approach B and knowledge-based employment development. Some respondents have called for a 1.5km gap between Greenstead, Longridge and the Garden Community development and some others support an alternative spatial strategy as suggested by the Community Liaison Group (CLG) – a variation of Approaches A and B which seeks to give more protection to Salary Brook and restrict, to recreational facilities, any development south of the A133.

Part of the rationale around Approach B and the additional land being identified for knowledge-based employment on the Salary Brook slopes was in response to the University's preference for any future development to have a direct relationship with the existing Knowledge Gateway and a closely aligned means of access. However, in the University's representations it acknowledges that the land adjoining Salary Brook is sensitive in environmental, landscape and topographical terms. There is an acceptance that the Approach B allocation would be harmful to the landscape and environmental attributes of Salary Brook and would be highly challenging from a technical construction perspective given the steep topography. The University's preference remains for knowledge-based employment land to be located north of the A133 but with a greater emphasis on the size of site and achieving good pedestrian connectivity with the existing Knowledge Gateway, allowing for the Salary Brook slopes to be protected from development and incorporated into the Country Park.



The lead developers, Latimer, are also sensitive to concerns over the impact of development extending towards Salary Brook and in its proposed approach, seeks to avoid any significant development in that location by directing knowledge-based employment land south of the A133. As explained in this report above, any decisions as to the future use of land south of the A133 will need to be informed by future evidence-based work.

Officers' initial consideration of the representations do however suggest that Approach B in respect of the knowledge based employment land extension onto the slopes of Salary Brook should not be carried forward in its current form. Protecting the sensitive slopes and setting of Salary Brook is likely to be a key priority of any revised version of the Plan going forward, but the implications for land south of the A133 and the preferred location for knowledge-based employment land will require further consideration.

### **KEY ISSUE: CROCKLEFORD HEATH & BROMLEY ROAD**

The Draft Plan identifies an Area of Special Character around Crockleford Heath with the aim of protecting its rural, loose-knit and sparsely developed settlement form and its distinctive and attractive network of green lanes and small fields. Whilst the designation seeks to recognise its importance and provide a degree of protection, the proposal has raised concerns – with many arguing that the protection being offered is insufficient.

A number of residents, including those represented by the Crockleford and Elmstead Action Group (CEAG) have raised concern that so much emphasis has been given to protecting Wivenhoe and Elmstead Market from coalescence, that it has resulted in having to plan for a higher density of development, which is to the detriment of Crockleford Heath and the other scattered communities that fall within the area proposed for development.

It is also suggested that the designation defined on the Key Diagram for the area of special character is not a true reflection of the community requiring protection and is smaller than it should be – focussing only on the properties around Chapel Lane. Some suggest that the protected area should extend a lot further to Bromley Road, along Chapel Lane and elsewhere to ensure it covers a wide enough area to enable the settlement to retain its identity. There are suggestions that housing proposed in the Crockleford Heath location could be accommodated by fractionally increased densities across the other residential areas which would also lower the landscape impact of the Garden Community and help to promote sustainable travel. Others suggest a greater focus of development around the University to relieve the pressure on the Crockleford Heath area.

As well as those wanting to achieve maximum protection for Crockleford Heath, there are some who own property and land who would rather be part of the development, than be completely surrounded by it or excluded from it.

Officers already acknowledge that further evidence is needed to inform the approach to the Crockleford Heath Area of Special Character in relation to its boundary and the key features and

characteristics that the policies in the Plan seek to protect. Essex Place Services have already been commissioned to undertake a character appraisal of the area and local residents will be invited to have an input into that assessment.

## **OVERVIEW OF COMMENTS RECEIVED**

The following is a very initial overview of some of the issues raised in relation to different policies in the Draft Plan for the Garden Community. Note that this is presented as a summary only, and does not convey all the separate points that have been raised, or the detailed elements which stakeholders and individuals have commented on. All of the points that have been made will be considered and responded to as the Plan moves forward.

### **Policy 1: Land Uses and Spatial Approach**

- Many objections to development south of the A133 and Approach B (explained in more detail above).
- University and Lead Developer suggesting neither Approach A nor B provides enough land for the development that is needed.
- Some support for the concept of three distinct but interconnected neighbourhoods within the Garden Community, with suggestions that the focus should be on delivering just one neighbourhood within the period to 2033.
- Lead developer, Latimer/Mersea Homes, questions the need for three neighbourhoods and three separate neighbourhood centres, suggesting that the number and location of such neighbourhoods and centres should emerge from further masterplanning work.
- General support for Strategic Green Gaps with suggestions that these should be widened in certain locations and given greater protection. The Lead Developer, Latimer/Mersea Homes, questions the need for the Strategic Green Gap policy – suggesting that it is not necessary.
- Concern about development in and around Crockleford Heath (explained in more detail above), requesting a ‘buffer’ between existing and proposed development and suggesting that the designation does not properly reflect the extent of the community.
- Strong support for the Salary Brook Country Park – but major concerns about Approach B and the possibility of development on the slopes around the brook (explained in more detail above).
- Some challenge to the need for an industrial business park on the A120, suggesting that an industrial park does not fit with the Garden Community principles and that it could have an adverse impact on air quality, traffic and the setting of listed buildings. The lead developers Latimer/Mersea Homes question the overall amount of industrial land, but also indicate additional areas for industrial uses east of the Link Road.

- Some question about the need for a Gypsy and Traveller site and its intended location. The Lead developer, Latimer/Mersea Homes, suggests that its location and size should be determined through future masterplanning work and not specified in the DPD.
- General support for Park and Choose facilities but many broader questions about the Rapid Transit System (RTS) and how it will operate.

### **Policy 2: Requirements for all new development**

- Some questions as to whether the policy is needed, as it repeats matters already covered elsewhere in the Draft Plan.
- There could be possible tensions in addressing each part of the policy, there could be a hierarchy.
- Policy needs to be more robust and include specific details of what must be provided.
- Some questions over the relationship with policies from CBC and TDCs Section 2 Plans and how these all fit together, and/or cover everything that is required.
- Need to include environmental standards to minimise the impact of development on the climate and surrounding communities.
- Need specific protections for residential amenity of existing properties.
- Important to consider surveillance and construction site security.
- Policy needs clarity about how impacts on heritage assets will be identified and protected.

### **Policy 3: Nature**

- Support for a country park and protecting land and woodland around Salary Brook Local Nature Reserve and objection to any development on Salary Brook, including the slopes.
- Support for the requirement for a Green Infrastructure Strategy, a multi-functional green infrastructure network and the creation of green infrastructure connections beyond the site boundaries.
- Building and design should be with the environment and climate change in mind.
- Concerns were raised that the existing nature on this entire site will be irreversibly damaged. Some questioned the overall principle of development and that it should not take place on agricultural land.
- The policy should set a more aspirational minimum target for biodiversity net gain and net gain should be delivered on site within the Garden Community. Higher targets were suggested by several stakeholders.
- The policy should set a more ambitious target for tree canopy cover – a higher canopy cover target was suggested.
- The policy should make reference to Natural England's Accessible Natural Greenspace Standards (ANGSTt) and commit to a minimum amount of Suitable Accessible Natural Greenspace (SANG) provision.

- Details and targets for the amount of green/ blue infrastructure should be included in the policy.
- The policy should require green roofs.
- The Welshwood Park Residents Association and several members of the public propose the creation of a nature belt / wildlife corridor around north-east Colchester by linking Churn Wood, Welsh Wood and Bullock Wood.
- Policy 3: Nature and Policy 8: Sustainable Infrastructure should be closely linked to gain the best opportunities for biodiversity.
- There is a gap in terms of lacking a policy on grey and black water treatment specifically. A decision as to the most sustainable methods of managing wastewater should be included in the DPD.
- There should be more to promote urban wildlife such as hedgehog holes in garden fences, wildlife ponds.

#### **Policy 4: Buildings, Places and Character**

- Densities and tenures (including specialist housing) across the Garden Community will need careful consideration both in terms of masterplanning and viability. Requirement for all new dwellings to be built to Part M4(2) may be too onerous and will need to be revisited.
- Masterplans and Design Codes should be informed by use of design review and assessment frameworks such as the National Design Guide, National Model Design Code, Building for a Healthy Life and Building with Nature, Secured by Design, Lifetime Neighbourhoods and Healthy Streets etc.
- Height restriction will need to be incorporated into masterplan and design codes to ensure that buildings are sympathetic to the existing landscape and local context.
- A question was raised about whether the policy can require design coding to cover the full extent of the existing University and proposed expansion.
- There needs to be further clarity and detail on stewardship and management of community assets.
- The Garden Community neighbourhoods should be focussed around hubs and community facilities and services.
- Creative Colchester Partnership have suggested collaboration on a cultural placemaking and commissioning strategy. Collaborative working with all key stakeholders and community groups was considered to be the preferred approach.
- The integration of new and existing communities, local assets, strategic green buffers as well as renewable energy, low carbon construction techniques, smart city and other climate change design and building considerations will be fundamental to achieving garden community principles and place making Affordable housing must be of a high quality, genuinely affordable and focussed on addressing the needs of those on the Councils' Housing Waiting List.

- Gypsy and Traveller Needs Assessment may be needed to support requirements.
- The Councils will need to understand the level of Student Housing required in terms of both location and numbers.
- Churches and other places of worship will be important to fostering good community relations.
- There needs to be clearer targets and objectives for managing car parking and private vehicle ownership and achieving a balance with the need to promote walking and cycling and other methods of active travel.
- Additional work to consider landscape and visual impacts would be required to support the Heritage Impact Assessment.

### **Policy 5: Economic Activity and Employment**

- Mixed views on where the Knowledge based employment land should be located – with a preference overall for it to be north of the A133 and away from the green buffer to Colchester.
- Conversely a view from the developers, Latimer/Mersea Homes, that a larger area of land is needed to accommodate the overall scale of development and therefore the University and knowledge based employment uses should be located south of the A133.
- Some questions were raised about the University of Essex needs for future growth with requests for more detailed justifications/analysis to underpin the forecasts, together with a plan/proposal of what would be envisaged.
- Quantify how the Employment and Skills Plan can deliver benefits to local communities.
- The developers indicate that the requirement for 25ha is based on the overall scale being up to 9,000 homes, if fewer homes are built there should be a commensurate reduction in employment land. However, the developers also suggest greater employment land through a combination of an enlarged industrial area to the north and east of the Link road, and the provision of knowledge based employment to the south.
- The developers question the feasibility of delivering the first phase of business accommodation in each employment area with the delivery of housing.
- Consideration should be given as to whether an element of home working should be accounted for.
- More flexible spaces are needed for the creative industries.
- Employment for disadvantaged people should be catered for.
- Many people living in the Garden Community will be employed elsewhere or work from home.
- The market should decide the diversity of jobs created by the Garden Community.
- More detail/ clarification is needed on the overall approach to employment and how it may provide new local economic opportunities.

## **Policy 6: Community and Social Infrastructure**

- There was support for multi-functional community buildings and spaces.
- Support for the commitment to community-centred, long-term stewardship and recognition that further work is needed to make sure the right model is chosen. Some concerns were raised that there was insufficient information about the approach to stewardship.
- Wide ranging sports provision and green corridors and walkways were identified as being particularly important to promote healthy living.
- Development must meet the on and off-site infrastructure needed to support the development and mitigate the impact of development on the existing community and environment.
- Infrastructure must be delivered first as a key principle.
- Concern regarding the lack of detail on infrastructure requirements and its phasing. Several stakeholders stated that an Infrastructure Delivery Plan was needed to provide more information.
- The Garden Community presents a great opportunity to innovate the delivery of schools.
- Some indicated a need for a new special educational needs (SEN) school.
- Concern that there are no specific plans or commitment from the NHS to build a purpose-built health centre within the whole of the Garden Community.
- A serving church presence in the new community would support the emerging community from its beginnings.

## **Policy 7: Movement and Connections**

- General support for the vision outlined in this chapter and ensuring active and sustainable travel is quicker and easier to use than the car - Active Design principles should be followed.
- Strong support for safe walking and cycling routes - dedicated and designed in line with latest best practice - 'no compromises' and connected with external routes and linked with existing communities.
- Some comment that car use should be discouraged – that this community needs to be different.
- Some comment that policy should have a stronger vision and focus on innovation, it should be looking ahead to what can be expected of transport norms in 30 years.
- Some support for the notion of each of the three neighbourhoods being served by their own connection off the Link Road to minimise through (short-cutting) traffic between the three areas.
- Some views that modal split targets should be ambitious and in favour of active and sustainable travel.
- Lead developer, Latimer, consider that approach to monitoring impacts of transportation policy requirements be flexible given that in early phases, the delivery of the Link Road close to the outset of occupation will create a significant challenge for delivering sustainable travel options with comparative (or improved) journey times over the car.

- Some views that policy is penalising large scale (norm) car use and ownership through parking and travel restrictions.
- Some question that the policy presupposes dramatic change in behaviour to achieve the modal split ambitions.
- Some concern that existing residents will still be reliant on their car; that development will lead to more traffic on already congested network with impacts on environment and air quality.
- Concern over traffic 'rat-running' on Bromley Road and that access from the Garden Community to Bromley Road should be limited.
- Some concern that the proposals outlined are Colchester centric and does not give wider consideration to access to/from other nearby existing communities. Comment that Plan should also give more consideration to wider integration and connections beyond the Garden Community and Colchester.
- View that there is a need to ensure that vital transportation infrastructure is delivered early/ahead of development to prevent pressure on existing communities - active travel infrastructure should be in place before houses built/occupied; schools should be in place at an early stage to avoid residents needing to travel to schools some distance away; and RTS should be delivered in early phases of the project to ensure first inhabitants not being reliant on private car transportation.
- Concern regarding lack of detail and phasing of transportation infrastructure - the Plan should be accompanied by an IDP, and transport evidence base and strategic modelling should be available to support policy and allow 'reality check'. Some comments that more detail is needed on 'aspirational' wish lists contained in the policy.
- Lead developer, Latimer, consider that there is a need for flexibility within the policy given the time over which the development will be constructed, particularly avoiding commitment to specific technological solutions that may be replaced with more effective alternatives.
- Link Road should not act as a barrier to travel across and within the Garden Community.
- Any newly constructed walk/cycle routes should be additional to, not substitutable for, the continuity of a natural green corridor; and there is a need to ensure that measures consider and are not detrimental to those with mobility issues.
- Many questions on detail on RTS routing and how it will operate. Comment that a firm position on operation should be a feature of the Plan.
- Comments that public transport links are needed to other public transport interchanges in wider area.
- Incentives should be in place to make public transport a preferable choice for residents over the car.
- Should have enough parking for houses, not like new estates where everyone is parked on roads and pavements. But also comments that number of cars per household should be limited.
- Provision should be made for secure parking for residents with work vehicles.
- Should establish minimum standards for secure cycle storage suitable in residential units.
- Provision should be made for electric vehicles and avoid influx of charging cables across pavements.

- Some views that proposals should not penalise disabled drivers and those dependant on their vehicles.
- Parking should also include facilities for motorcycles and mopeds.
- Firmer support should be provided for car sharing schemes.
- Delivery of goods and services needs to be considered. Some views that receiving deliveries should be as easy and low impact as possible.
- Some support for Link Road but also some comments that the case for Link Road has not been made and is contrary to Garden Community principles and Climate Emergency. New roads lead to increase in traffic; if trying to discourage car use – why build a new road.
- Some comments that Link Road should not be a through-route and green cordon concept has been ignored.

### **Policy 8: Sustainable Infrastructure**

- There was broad support for the aspirations and expectations in the policy. This project should be in the vanguard of sustainable building.
- Some stakeholders raised issues with the level of details, including costs, which should be included about how the aspirations and expectations will be achieved and will be viable.
- District heating, energy generation and community generated energy were considered as opportunities which could be included in the plan.
- There should be a policy specifically addressing the use of digital and smart technology in the Garden Community.
- Green infrastructure should be better referenced in the policy, as there are clear links between the provision of certain infrastructure (such as in relation to on site water management) and the provision of green spaces.
- Concern that there are no plans for a new sewage treatment plant and it is not clear how water will be supplied.

### **Policy 9: Infrastructure Delivery, Impact Mitigation and Monitoring**

- An Infrastructure Delivery Plan (IDP) needs to be published setting out the infrastructure required for the Garden Community and phasing of this. Viability appraisals must be published to cross-check that the requirements set out in the IDP are deliverable.
- There were some questions about how will housing, including affordable housing, and business rates be split between the Councils beyond the plan period.
- How will assets be managed and maintained long-term and which Council will be responsible for this.
- Long term stewardship and ongoing monitoring were considered by many to be critical to the success of green infrastructure and biodiversity proposals.
- Further monitoring indicators are required such as indicators to monitor modal shift, healthcare, water, biodiversity, behaviour change and the impact on heritage assets and their setting.



### **Comments on the Sustainability Appraisal (SA)**

- Clarification is required about terminology in the report.
- The impact of the Bellway development should be included in the cumulative assessment.
- The lead developers Latimer/Mersea Homes considered that the SA should appraise the option promoted by them in their representations as a reasonable alternative.
- Some considered that the sustainability work does not go far enough and should reflect local climate emergencies.
- Some questioned why the SA didn't use the same objectives the Section 1 work did and doesn't have any logical progression from the latest sustainability assessment.
- SA Objectives related to health should be expanded.

### **APPENDICES**

None.

### **BACKGROUND PAPERS**

All representations received can be viewed via: [Comments from the Draft Plan Consultation | Creating a Place for Life \(tcbgardencommunity.co.uk\)](#)