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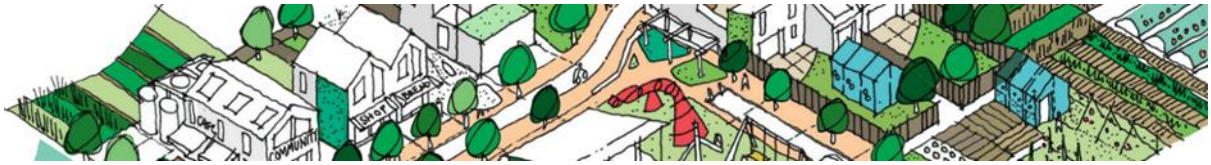

INDEPENDENT EXAMINATION

Tendring Colchester Borders Garden Community (TCBGC)
Development Plan Document (DPD)

HEARING STATEMENT – LOCAL PLANNING AUTHORITY

Main Matter 2 - Land Uses and Spatial Approach (GC Policy 1: Land Uses and Spatial Approach)

April 2024

Tendring District Council

Colchester City Council

1. INTRODUCTION

1.1 This document is Tendring District Council (TDC) and Colchester City Council (CCC) "the Councils" response to the Matters, Issues and Questions identified for examination by Inspector Graham Wyatt of the Planning Inspectorate, as published on 4 March 2024 (IC3). This is one of nine separate response papers produced by the Councils to address the specific matter and issue as identified on the front page.

1.2 Each response paper includes a number of references to specific evidence which has been relied upon in answering the matters, issues and questions. These reference numbers relate directly to the Examination Library website, where all evidence is published:

Tendring Colchester Borders Garden Community Development Plan Document: Examination Library | Creating a Place for Life (tcbgardencommunity.co.uk)

1.3 As a result of a full and comprehensive review by the Councils of all Regulation 19 representations, and following positive and cooperative engagement with statutory bodies and stakeholders through Statements of Common Ground (SoCG), a series of modifications have been recommended to the DPD Policies and supporting text. Where relevant these modifications are referred to throughout the Councils' Hearing Statements and a full schedule can be found in the 'Schedule of Modifications' (CC4).

2. RESPONSE TO INSPECTOR'S QUESTIONS

Main Matter 2 – Land Uses and Spatial Approach (GC Policy 1: Land Uses and Spatial Approach)

Is the DPD justified by appropriate available evidence, having regard to national guidance, and local context?

2.1 Yes, the DPD reflects national guidance, has been informed by appropriate evidence and has regard to local context.

2.2 GC Policy 1 sets out the spatial strategy for the Garden Community and sets out what land will be included, which areas will be allocated to housing, employment, open space and other uses, and which areas will be protected from development. In doing this GC Policy 1 takes forward the requirements of the Section 1 Plan and is supported by a 'Policies Map' (CD2) which allocates the land for the Garden Community and the spatial disposition of a range of land uses.

2.3 Chapter 2 of the DPD defines the 'Strategic Vision' for the Garden Community. Emerging from the vision is a series of themes, each of which is further described and supported by Strategic Principles and Objectives. The Strategic Principles describe the outcomes that are to be achieved, whilst the Objectives set out in more detail how the Strategic Principles will be achieved. They address both spatial and non-spatial implications and have been the core

guiding elements in the overall approach to the DPD and across the background evidence base, in particular relating to the 'Strategic Framework Masterplan' (EB1) process.

National Planning Policy Framework

2.4 At the outset of the Government's National Planning Policy Framework (NPPF), it states that the 'purpose of the planning system is to contribute to the achievement of sustainable development' (para. 7) and that at the heart of the Framework is a 'presumption in favour of sustainable development' (para. 10). For plan-making, this means promoting a sustainable pattern of development that meets development needs (particularly the objectively assessed need for housing), aligns growth and infrastructure, improves the environment and mitigates / adapts to climate change.

2.5 GC Policy 1 reflects the NPPF as it promotes mixed-use communities, where social interaction is promoted, and places with good street layouts that are easily connected through pedestrian and cycle routes, which are provided with safe and accessible green space (Chapter 4 of the DPD: Nature), employment and job opportunities (Chapter 6 of the DPD: Economic Activity & Employment) and local community services and facilities (Chapter 7 of the DPD: Community & Social Infrastructure). Into this is added the early consideration of transport routes and modes to ensure that sustainable means of movement can be employed and encouraged (Chapter 8 of the DPD: Movement & Connections), and development is focused on locations which are or can be made sustainable (Chapter 9 of the DPD: Sustainable Infrastructure). In meeting the defined needs of a place – housing and employment in particular – best use should be made of existing and available land, and its use will be optimised based on character and context assessments.

2.6 The DPD is supported by an extensive evidence base which has been prepared in accordance with national guidance and has evolved through the various stages to consider baseline conditions, alternative options & approaches. This led to a formal stage of consultation on a 'Draft Plan' (Regulation 18 stage). Work continued to consider the consultation responses and additional evidence gathering which has led to the preparation of the 'Submission Version Plan' which formed the basis of the Regulation 19 stage consultation and which is being considered through this Examination in Public.

2.7 Where appropriate, each study within the evidence base has had regard to the local context of the Garden Community. Of particular note being work related to masterplanning which has drawn together material on the baseline context (EB4), the development of alternative design options (EB3) the articulation of an overall strategic vision (EB2), leading to the preparation of a final 'Strategic Framework Masterplan (EB1) which draws together all the previous work and wider work across the other relevant themes.

Is the DPDs spatial strategy and the distribution of development as set out in GC Policy 1: Land Uses and Spatial Approach supported by robust and up to date evidence and otherwise soundly based?

2.8 Yes. The spatial strategy for the Garden Community and the distribution of development is supported by robust evidence and is soundly based. The wider spatial strategy in the context of Tendring and Colchester is derived from the Section 1 Plan which is established in planning

policy and has therefore already been subject to testing through Examination in Public and found sound.

2.9 The approach has been informed by a wide range of evidence gathering across a number of topics and themes including detailed consideration of matters relating to environment & heritage, economic, transport & infrastructure and viability, and all drawn together into the strategic masterplanning process. The DPDs approach to the spatial strategy, quantum and distribution of development as set by GC Policy 1 has been supported by an appropriate evidence base with proportionate technical evidence, survey work and the comments of local people, stakeholders, and other interested parties as part of public engagement and formal consultation activities.

2.10 The DPD recognises that the outdoor natural environment of the garden community will be its biggest asset. It seeks to provide green infrastructure where neighbours will spend time, play, interact and grow, whilst providing a natural support system for both people and wildlife.

2.11 Paragraphs 92 and 93 of the NPPF requires that planning policies plan positively for safe and accessible green space and open space. Paragraph 98 of the NPPF goes on to note that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.

2.12 The Section 1 Plan takes this forward at point x. of policy SP8 which requires the creation of *"distinctive environments which are based on comprehensive assessments of the surrounding environment and that celebrate natural and historic environments and systems, utilise a multi-functional green-grid to create significant networks of new green infrastructure including a new country park at the garden community, provide a high degree of connectivity to existing corridors and networks and enhance biodiversity."* Part A, point 1 of SP9 further requires that the new Garden Community draws on its context and existing assets whilst safeguarding the important green edge to Colchester with a new country park, and Part F, point 18 of Policy SP9 which requires *"Landscape buffers between the site and existing development in Colchester, Wivenhoe and Elmstead Market".*

2.13 The evidence base includes detailed consideration of local environmental conditions and considerations including the 'Crockleford Heath Area of Special Character Assessment' (EB7), the 'Open Space, Playing Pitch, Outdoor Sports and Built Facility - Overarching Strategy' (EB9), Heritage Impact Assessment (EB10 and EB10a), and the 'Preliminary Archaeological Assessment' (EB11), all of which have informed the 'Strategic Framework Masterplan' (EB1). The Objectives of the DPD make it clear that the Garden Community will take a landscape led approach to development and will create a place with distinctive identity. The existing important landscape features of both green and blue infrastructure (ancient woodland, hedgerows) are identified as the structure around which the Garden Community will grow.

2.14 The NPPF also recognises that the planning system can support healthy, inclusive communities and can deliver wider benefits for nature and support efforts to address climate change. Paragraph 98 states that *"access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities"*.

2.15 Taking forward Policy SP9 of the Section 1 Plan which requires the provision of sports areas, and indoor leisure and sports facilities, the DPD Objectives (contained within Appendix 2 of

the DPD) require the provision of high quality and accessible sports facilities, playing pitches and greenspaces. The spatial implications of the sports, recreation and open space requirements required by GC Policy 6 and as detailed in the 'Open Space, Playing Pitch, Outdoor Sports and Built Facility - Overarching Strategy' (EB9), have been considered within the context of the overall quantum of development as defined by GC Policy 1. This has been addressed within the 'Strategic Framework Masterplan' (EB1) process, which has supported the DPD and which has fully considered the total area of open space required to meet the needs of the Garden Community in addition to the sports and recreation needs of the University of Essex, as also considered by the 'Review of University Land Requirements - Wisher Report' (EB16). Further information on sports/recreation is addressed under the commentary on 'Part F' later in this statement and is set in the Hearing Statement for Matter 6: Community and Social Infrastructure.

2.16 The Councils have prepared Statements of Common Ground (SoCG) with Sport England (SE) (SCG01), Historic England (HE) (SCG03) and the University of Essex (UoE) (SCG04) which include suggested modifications to the wording of GC Policy 1 which both parties have agreed to. These are referred to below under the relevant part of the Policy. The SoCG with SE confirms that there are **no unresolved issues or areas of uncommon ground**. The SoCG with HE confirms that there are **no unresolved issues or areas of uncommon ground**.

Part A: Land Use Parameters and Policies Map

2.17 Part A of GC Policy 1 defines the Land Use Parameters, it requires proposals for development to comply with the 'Policies Map' (CD2) and meet the specific requirements of policies elsewhere in the DPD.

2.18 The evidence for the spatial strategy has advanced through consideration of detailed evidence across a number of themes and topics and drawn together into the development of the 'Strategic Framework Masterplan' (EB1), considering the physical constraints and opportunities of the broad area of search and defining the developable area, with boundaries defined by the 'Strategic Green Gaps' and both the existing and proposed roads. This has refined the , which is consistent with the Section 1 Plan range of 7,000 to 9,000. The Section 1 Plan is established in planning policy and been adopted by the Councils. This has therefore already been subject to testing through Examination in Public and found sound. Provision of sufficient housing is critical to meet the needs of a growing population and for the effective functioning of local economies. Further information on housing need, capacity and projections is set out within the Hearing Statement for Matter 4: Buildings, Place and Character.

2.19 The allocation of the uses within Part A of GC Policy 1 and the 'Policies Map' (CD2) are expanded on under Parts B to J, each of which are expanded on in the sections below. This is with the exception of 'Provision for the Rapid Transit System' further information which is set in the Hearing Statement for Matter 7: Movement & Connections.

Part B: The Garden Community Neighbourhoods

2.20 The NPPF promotes the creation of healthy and safe communities through planning polices which promote social interaction through mixed-use developments, strong neighbourhood centres and good connections. Paragraph 126 of the NPPF states that *"The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve".* Supported by an extensive evidence base, including

a series of masterplanning documents culminating in the 'Strategic Framework Masterplan' (EB1), the DPD provides a long-term vision and area-based planning and delivery strategy for the Garden Community.

2.21 The DPD seeks to enhance the sustainability of future communities through the positive planning for the provision of shared spaces, community uses and local services which are well connected and integrated with housing, economic uses and supporting facilities. GC Policy 1 Part B establishes the principles of the Garden Community Neighbourhoods which will be the principle focus of new development and which will deliver three distinct but interconnected 'Neighbourhoods'. Connectivity and access to local services promotes social cohesion, wellbeing and a healthy, happy community that is engaged, empowered and socially inclusive.

2.22 Residents within the 'South and North Neighbourhoods' will have high accessibility to local services and facilities, which will facilitate the use of walking, cycling and public transport. The Garden Community will be planned and developed on the concept of a "20-minute neighbourhood" and the DPD includes a range of interrelated policy actions to support this, informed by technical transport evidence and masterplanning work contained in Transport Evidence Part 1 – Mode Share Targets (EB19), Transport Evidence Part 2 – Transport Measures (EB20), Transport and Movement Framework Part 1: Baseline & Analysis (EB21), and Transport and Movement Framework Part 2: Vision and Principles (EB22).

2.23 The 'Crockleford Neighbourhood' will be developed as an individual but interlinked community, it will develop its own character which will protect and respect the character formed by its heritage assets, their settings and the distinctive network of greenspaces which will be enhanced and extended. This has been informed by the establishment of the 'Crockleford Health Area of Special Character' on the 'Policies Map' (CD2), informed by the Councils 'Crockleford Heath Area of Special Character Assessment' (EB7) and 'Heritage Impact Assessment' (EB10 and EB10a) within the DPD evidence base.

2.24 All three neighbourhoods, and the A120 Business Park, will be linked by the Rapid Transit System, providing fast and reliable connectivity between the neighbourhoods and beyond. GC Policy 1 Part B further establishes the principle of delivering key infrastructure necessary to serve the early phases of development. Further information on the methods for securing infrastructure delivery is set in the Hearing Statement for Matter 9: Infrastructure Delivery, Impact Mitigation and Monitoring.

2.25 A number of representations from local residents were received at Regulation 19 stage which raised concerns over the impact on the character of Crockleford Heath, including the need for a buffer and the protection of heritage assets. The Councils consider that GC Policy 1 Part B is sufficiently robust to ensure that the intrinsic character of Crockleford Heath is preserved and enhanced through the development of future plans. Green corridors as illustrated on the 'Policies Map' (CD2) are indicative only and subject to future masterplanning, GC Policy 1 in combination with GC Policy 2 'Nature' is considered sufficiently robust to ensure future provision and protection of the green spaces around Crockleford Heath is secured.

Part C: Salary Brook Country Park

2.26 Paragraph 174 of the NPPF requires that planning policies should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. At Regulation 18 stage representations from local residents and stakeholders demonstrated considerable support for the protection of the Salary Brook slopes which represent a valued

and important asset in the local area. The Councils recognised and concurred with this strong public sentiment and GC Policy 1 Part C and the 'Policies Map' (CD2) allocates the Salary Brook Slopes as a Country Park. This allocation satisfies the requirements of Policy SP9 of the Section 1 Plan which requires that *"safeguarding the important green edge to Colchester will be essential with a new country park provided along the Salary Brook corridor and incorporating Churn Wood"* and that a Landscape buffer *"between the site and existing development in Colchester"* be provided.

2.27 There was strong support for the protection of the Salary Brook Slopes and the provision of a Country Park in this location at Regulation 19 stage, recognising that development encroaching on this area would be restricted through the DPD. Some representations, including that from Sir Bob Russell (ID.217), continued to raise concern over the impact on existing views and vantage points from Greenstead. The eastern boundary of the Country Park allocation has been extensively considered through the 'Viewpoint Wireline Testing Document by Gillespies' (EB5). The viewpoints in the document were selected for iterative testing to assess likely impacts and mitigation requirements on buffers including the boundary with Salary Brook (to consider what could be suitable in relation to heights/massing/extent of development and visibility from Greenstead).

2.28 The viewpoint testing shows that from the footpath on Sherbourne Road, development within the Garden Community will be of very limited visibility and buildings would not break the wooded skyline. From Hawthorne Avenue development will not be visible as it would be almost entirely filtered and screened by mature vegetation within Salary Brook Local Nature Reserve area and buildings would not break the wooded skyline. The Garden Community would be behind a mature vegetation belt which will provide good screening in winter as well as summer. The 'Viewpoint Wireline Testing' (EB5) goes on to note that no further visual mitigation is recommended to screen the development however the existing trees and vegetation should be retained and managed and new woodland should be planted along the eastern edge of the new Salary Brook Country Park connecting the existing ancient woodlands of Walls Wood and Churn Wood and strengthening the character of the upper slopes of the Salary Brook valley. GC Policy 2 Part E 'Tree Planting' takes this forward requiring that opportunities should be taken to connect patches of existing woodland within the Country Park through tree belt planting.

2.29 To ensure full consideration is given to the protection of those important local views from Greenstead, visual impact would be considered during the assessment of future applications which will need to be informed by detailed Landscape Visual Impact Assessments as required by GC Policy 3 'Place Shaping Principles', and areas for planting or regeneration should be set out and agreed in appropriate landscape and green blue infrastructure strategies as required by GC Policy 2 'Nature'. Further information is set out in the Hearing Statements for Matter 3: Nature and Matter 4: Buildings, Place and Character.

Parts D & E: Strategic Green Gaps

2.30 Land is designated and shown on the 'Policies Map' (CD2) as 'Strategic Green Gaps' for both Elmstead and Wivenhoe. Land within these 'Strategic Green Gaps' will be protected from inappropriate built development to ensure the Garden Community does not extend or sprawl into locations where it could eventually merge or coalesce with Wivenhoe or Elmstead Market.

2.31 Representations received from local residents and stakeholders such as Elmstead Parish Council and Wivenhoe Town Council at both Regulation 18 and Regulation 19 stages reflected public sentiment with regard to the importance of providing and protecting coalescence breaks. The Section 1 Plan at Part F, point 18 of Policy SP9 requires *"Landscape buffers between the site and existing development in Colchester, Wivenhoe and Elmstead Market".* The Council considers that the 'Strategic Green Gaps' as allocated on the 'Policies Map' (CD2) effectively and comprehensively address the requirements of the Section 1 Plan through the provision of appropriate areas of land where development will only be supported where its role and function would not be materially harmed.

2.32 The designation of the 'Wivenhoe Strategic Green Gap' will provide protection to the open countryside to the south of the Garden Community, maintaining the long-term physical and visual separation to Wivenhoe and continuing the Coalescent break established in the Wivenhoe Neighbourhood Plan 2019. This provides a minimum distance of appropriately 0.8km between the southern edge of potential built form within the 'Sports and Leisure Park' and the closest point of the existing settlement boundary of Wivenhoe to the south.

2.33 With regard to the 'Elmstead Strategic Green Gap', this will provide protection to the open countryside to the east of the Garden Community utilising the physical barrier created by the A120-A133 Link Road to provide a minimum distance of approximately 1km between the eastern edge of the Garden Community 'Neighbourhoods' and the closest point of the existing settlement boundary of Elmstead Market to the east.

2.34 Historic England (HE) in their Regulation 19 representation welcomed the specific measures for historic environment in GC Policy 1 Part E, but noted that further clarity is required with regard to the identification of designated heritage assets to make the policy sound. Through suggested modifications to policy wording and the undertaking of a further Heritage Impact Assessment (HIA EB10a) as detailed in the Statement of Common Ground with HE (SCG03) and as suggested in the Schedule of Modification (CC4), HE have confirmed that there are now no unresolved issues.

2.35 As noted, the 'Elmstead Strategic Green Gap' has been informed by the 'Heritage Impact Assessment' (EB10 and EB10a) which identifies designated heritage assets potentially affected by future development including the Grade I Church of St Anne and St Lawrence and the Grade II* Elmstead Hall. In addition to HE, a number of representations from local residents and stakeholders at Regulation 19, including Elmstead Parish Council, raised concern with regard to the impact on these assets. The 'Elmstead Strategic Green Gap' extends northwards providing a buffer around the A120 Business Park and seeks to assist in protecting the setting of the heritage assets. Through the SoCG, HE have confirmed that they have no outstanding areas of concern, further information on heritage matters is set out in the Hearing Statement for Matter 4: Buildings, Place and Character.

2.36 Representations were also received stating that the uses including outdoor sport and recreation, local low carbon energy generation, cemeteries and burial grounds or allotments, considered appropriate within the 'Strategic Green Gaps' as defined within GC Policy 1 Parts D and E would be inappropriate and that use of the land south of the A133 would cause light pollution. The Councils consider that those uses detailed would represent the provision of appropriate development for a countryside location, consistent with National and Local planning policy. This is in line with Paragraph 120 of the NPPF which states that planning polices should *"recognise that some undeveloped land can perform many functions, such as*

for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production". Furthermore, the impact of any change of use or development proposed within the Strategic Green Gaps would be considered at planning application stage, whilst any impact on light pollution could be effectively mitigated. Further information on open space is set in the Hearing Statement for Matter 3: Nature.

Part F: Sports and Leisure Park and University of Essex Expansion

Land South of the A133

2.37 Within the broad location of the Garden Community as defined by the Section 1 Plan is a triangular area of land located to the south of the A133 which comprises of agricultural land. This area of land, and use allocations within it, was a notable topic of representations received on the Draft Plan at Regulation 18 stage with conflicting positions expressed by key stakeholders and interested parties. Representations received from local residents and stakeholders such as Wivenhoe Town Council also reflected public sentiment that was not supportive of development south of the A133.

2.38 In light of the importance of this part of the site, the Councils have prepared a Topic Paper that explains the wider context and history of this area, alongside consideration of matters relevant to the adjacent University of Essex (Land South of the A133 & University of Essex Topic Paper, reference TP3).

2.39 The DPD evidence base and evolution of the masterplanning approach included consideration of alternative approaches to the scale and distribution of land uses across the area of search, including alternative options and approaches to the land South of the A133, which were set out in the Draft Plan that was subject to Regulation 18 consultation. Further evidence gathering in addition to the consultation responses received on the Draft Plan, fed into and informed the development of the final 'Strategic Framework Masterplan' (EB1) work which proposed an illustrative layout, relationships between land uses and provides a check on overall site capacity. It tested and defined key areas of land use and quantum of development including supporting infrastructure land uses. Combined, the wider evidence base has informed the preparation of the DPD and the land use allocations in the 'Policies Map' (CD2).

2.40 The 'Policies Map' (CD2) allocates the land south of the A133 for two purposes as addressed by GC Policy 1 Parts D and F. Part F 'Sports and Leisure Park and University of Essex Expansion' allocates 25ha of land for university sports requirements and, in part, would meet the wider needs of the Garden Community as evidenced by the 'Open Space, Playing Pitch, Sport & Recreation Study' (EB9). It is recognised that further sports facilities would also be required elsewhere within the Garden Community Area, the total of which has been evidenced within the 'Strategic Framework Masterplan' (EB1).

2.41 Part D of GC Policy 1 allocates the remaining land south of the A133, comprising approximately 40ha, as the 'Wivenhoe Strategic Green Gap' which aligns with and continues the line of the Wivenhoe Coalescence break within the Wivenhoe Neighbourhood Plan 2019.

2.42 In addition, the Councils evidence base also includes an assessment of the potential visual impact of proposals in this area within the 'Viewpoint Wireline Testing' (EB5), which was prepared to support the preparation of the 'Strategic Framework Masterplan' (EB1). This has tested viewpoints from Wivenhoe looking northwards towards the Garden Community (viewpoints 6 & 7). The testing work recommended that any development in the area of land

south of the A133 should be located at the northern edge along the A133 to ensure that the visual impact was minimised and to keep built development away from Wivenhoe to the south. The Councils consider that sports facilities would be appropriate in the northern area of the Sports Park as set out on the 'Policies Map' (CD2) but would consider that more extensive development such as student accommodation would have a much greater and unacceptable visual impact in this sensitive location.

2.43 The identification of the land use sensitivities and the development of the spatial strategy relating to the land south of the A133 has been informed by a comprehensive process involving the analysis of the existing land use and historical evolution of the surrounding area along with the requirements of the Section 1 Plan and national planning policy. Crucially, the process has also been informed by community engagement to ensure that the DPD land use allocations and spatial strategy reflects the Section 1 Plan strategic policy requirements and takes full account of local land use issues and sensitivities.

University Expansion

2.44 The Section 1 Plan requires that the DPD includes the allocation of land within the Garden Community to accommodate University Expansion, which is at least equivalent in size to the allocation in the CCC 2010 Local Development Framework Site Allocations DPD.

2.45 Further information has been included in the Topic Paper which explains the wider context and history of this area, alongside consideration of matters relevant to the adjacent area of land South of the A133 (Land South of the A133 & University of Essex Topic Paper, reference TP3).

2.46 GC Policy 1 Part A and Part F take forward this requirement with approximately 25ha of land south of the A133 allocated on the 'Policies Map' (CD2) for a new 'Sports and Leisure Park' to facilitate the enhancement of sports facilities required by the University of Essex (UoE) as part of its plans for long-term expansion.

2.47 The Councils consider that this allocation comprehensively meets the requirements of the Section 1 Plan, that it appropriately responds to the long-term expansion requirements of the UoE and that it does not compromise the local land use sensitivities relating to the land south of the A133.

2.48 The UoE has suggested that based on future growth projections for the University, there is a need for 7.8 to 9.1 hectares of expansion land for student accommodation for priority students in the period to 2035 (UoE Reg 19 Rep, para 4.18). Priority students are primarily first year students, plus other groups such as those with disabilities. As per the findings of the 'Review of University land Requirements' report prepared by Wisher Consulting (EB16), the Councils are not challenging the growth aspirations of the University and recognise its importance to the local area. Within the Statement of Common Ground (SoCG) between the Councils and the UoE, (SCG04) the UoE has suggested that all of this land needs to be found in one location, and that this location needs to be land south of A133 and east of Colchester Road, within the Garden Community area.

2.49 The Councils **disagree** with this position for the following reasons:

2.50 The UoE anticipates that it could develop additional bed spaces within the existing Campus. This would align with recent development activity and ensure students can be fully integrated into the existing Campus. The UoE in their Regulation 19 representation consider that a

maximum of 1,000 bed spaces could be developed (para 4.17). Whilst the Councils understand that the Campus is subject to a number of constraints, no detailed evidence has been provided and no up to date masterplan for the future Campus area has been set out to enable a robust consideration of the full potential for new development, the condition and/or need for redevelopment of out dated buildings and/or rationalisation of the existing estate

2.51 In addition to the potential on Campus capacity, as outlined in the 'Review of University land Requirements' report prepared by Wisher Consulting (EB16), and repeated in the UoE Regulation 19 representation, land to the south of A133 and east of the B1028 is one of several locations that the UoE could be consider for the expansion requirement. The UoE states in its Regulation 19 Representation (see para 4.19) that it would also consider the potential to meet this requirement on:

- Land it owns to the west of the existing University Campus at the Hythe, and
- Land to the south of the existing UoE Campus across Boundary Road, which the UoE clearly state is their preferred option for expansion (see para 4.19).

2.52 The Councils position is that the UoE should fully exhaust the development potential of the existing Campus and the other expansion locations before any consideration takes place of development at land south of the A133 which is more appropriately suited to meet the UoE expansion requirements relating to sports facilities, as a shared facility with residents of the Garden Community and wider area.

2.53 The UoE requirements for future sports and leisure facilities to align with their long-term expansion plans has been assessed and quantified in the 'Review of University land Requirements' report prepared by Wisher Consulting (EB16) which agrees with the UoE that a circa 2ha plot is likely to be required for built sports facilities, and that subject to the balance of 3G/4G artificial pitches versus grass pitches, that 10ha is needed for future outdoor pitch needs. The 'Review of University land Requirements' report prepared by Wisher Consulting concludes that land south of the A133 would be the most suitable location to meet this need.

2.54 The Councils do not agree with the UoE position that all of the student accommodation requirement would need to be delivered by the UoE itself and within an immediate extension of the existing campus boundary. Contrary to what is said in the UoE Regulation 19 submission, the provision of accommodation for first year students is not a legal or statutory requirement or the sole remit of universities. Para 4.6 of the Regulation 19 representation does acknowledge that it is 'common practice', and the Councils do acknowledge that provision alongside academic and student support facilities is an important selling point in attracting students.

2.55 Data from Knight Frank shows that some 30% of UK private sector Purpose Built Student Accommodation (PBSA) is rented to first year students and that much of this is in off-campus or edge-of-campus settings. This is seen locally in Colchester at the private sector operated Hythe Mills development which is very close to but outside the UoE Campus and openly markets itself to first year students. The Councils understand other private sector operated PBSA in Colchester also caters for first year students.

2.56 Neither the area of land south of the A133 which the UoE are promoting for student accommodation or the land north within the Southern neighbourhood of the Garden Community are under the ownership or control of the University, and therefore neither

provides additional benefit in terms of deliverability specifically by the University and/or incorporation into an extended campus.

2.57 The Regulation 19 Representation from the UoE states at Para 4.20 that it considers land north of the A133 to be disconnected from the University Campus, with the A133 being a barrier to movement. The UoE is categoric that it will not develop its own student facilities in this location. The Councils consider that in spatial terms, parts of the proposed Southern neighbourhood are in close proximity to the main location of academic and student support services, which are on the western half of the Campus. The Councils have also made clear in GC Policy 1 that there would need to be good sustainable links into the Campus, and GC Policy 9 also sets out requirements for pedestrian and cycle links between the Garden Community and the Knowledge Gateway & University of Essex Campus. The Rapid Transit System would also provide a fast and direct link between the neighbourhoods of the Garden Community and the adjoining University campus. The Councils therefore do not consider that the issue of severance is so significant to be incapable of being appropriately addressed, and indeed it will need to be in any event to ensure that the Garden Community can connect with adjoining areas.

2.58 The Councils are keen to create mixed and balanced new communities on the Garden Community, to include a range of housing types, ages and types of occupiers. The Councils preference has been to integrate student accommodation as part of a wide residential and living environment. GC Policy 1 therefore encourages student accommodation in accessible locations in the 'South neighbourhood' as it will help to contribute to a mixed and diverse community. GC Policy 4 also enables a provision of different types of housing including student accommodation. The actual quantum of bed spaces is not set out in policy, but the background evidence base for the 'Strategic Framework Masterplan' (EB1) and the 'Financial Viability Assessment Update' (EB25) have considered the potential inclusion of 2,000 bed spaces of 'Purpose Build Student Accommodation' (PBSA) as part of the Garden Community neighbourhoods.

2.59 Finally, the Councils have carefully considered the approach to land South of the A133 in light of the various Representations and considerations. The Councils consider that sport and leisure uses to be most appropriate given the proximity to and alignment with existing sports facilities on the Campus, and the ability of such uses to strengthen and protect potential coalescence between built development on the Garden Community neighbourhoods to the north and Wivenhoe to the south. The Councils consider that it is not a suitable location for academic or student accommodation as it is some distance from the majority of the existing Campus estate, separated by Wivenhoe Registered Park & Gardens and the Colchester Road/B1028 (which provides the main access road to Wivenhoe). It is for these reasons that the Councils strongly disagree with the UoE that land to the north of the A133 and within the Garden Community Neighbourhoods should be dismissed as capable of meeting some of the expansion requirement for priority students or that student accommodation should be allowed within Part F of Policy GC1 (as part of the Sports & Leisure Park and Expansion Land, on the land south of the A133). Even if the UoE has reached a view that it does not itself wish to deliver student accommodation within Garden Community neighbourhoods, the UoE itself has no direct land or interest in any event, and private sector operators are likely to be more open minded. The UoE states that private sector PBSA operators may find this location north of the A133 attractive for developing accommodation for returning second year students. It is clearly not inconceivable therefore that it will also be attractive to the private sector to deliver

accommodation in that location for first year students and other priority groups, in light of wider requirements to improve access and connectivity across the area.

Part G: Knowledge-Based Employment Land and Part H: A120 Business Park

2.60 The Councils have high expectations for ensuring that residents of the Garden Community have access to a range of opportunities for employment, education and training across a variety of sectors. The approach to maximising the economic potential of the Garden Community has been informed by the evidence base including the 'Economic and Employment Study' by Quod (EB15) and the 'Review of University land Requirements' by Wisher Consulting (EB16). GC Policy 1 Parts G and H, and the 'Policies Map' (CD2) establish the land uses and spatial parameters for economic uses, whilst GC Policy 5 explains how this will be achieved, with an aim of creating at least one job per new household within sustainable commuting distance.

2.61 For economic/employment needs, the identified need is derived from the Section 1 Plan allocation which is established in planning policy and has therefore already been subject to testing through Examination in Public and found sound. The 'Economic and Employment Study' by Quod (EB15) sets out the evidence, analysis and recommendations which has informed the DPD. The Quod Report considers the economic evidence supporting the allocation of 25ha of employment land for the Garden Community (as defined in the Section 1 Plan), how it might be achieved and any barriers to success, what might be done to reduce those barriers and how to secure the authorities' ambitions through planning policy. The evidence and engagement with stakeholders (as set out in the Quod report) indicates that the 25ha allocation remains sound, assuming there is flexibility and breadth in how it could be delivered.

2.62 GC Policy 1 Part G allocates approximately 8ha of land north of the A133 for knowledge-based employment purposes to maximise the benefits arising from close proximity to the UoE and the existing developing Knowledge Gateway development. In their regulation 19 representation (UoE Reg 19 Rep) the UoE attest that a further 13ha of land is required rather than the allocated 8ha in the DPD; the UoE maintain this position in the SoCG with the Councils (SCG04) and also consider that the location and layout illustrated on the 'Policies Map' (CD2) would be insufficient to deliver the potential growth in jobs.

2.63 The Councils **disagree** with this position for the following reasons:

2.64 Based on research and analysis carried out in the 'Wisher Consulting' report (EB16), considering an assessment of existing science and technology parks, the overall concept of 20ha (12ha from the existing knowledge Gateway and 8ha from the proposed knowledge based employment land) would be sufficient to create a critical mass and would be sufficient to create a product of regional/national significance. The Councils agree with the University on the need to create a single coherent property product and the need for adjacency and integration with the existing Knowledge Gateway is paramount. The 'Policies Map' (CD2) illustrates a broad location for knowledge-based employment land informed by the 'Strategic Framework Masterplan' (EB1) work. The broad location illustrated allows for future flexibility in the delivery of the employment area, the layout and connectivity of which would be evidence by comprehensive and detailed area specific masterplanning carried out by the developer as required by GC Policy 1 Part K.

2.65 GC Policy 1 Part H allocates approximately 17Ha of land immediately south of the A120 and east of the new 'Link Road', together with the 8ha of knowledge-based employment land this satisfies the requirements of Policy SP8 of the Section 1 Plan. Further information of capacities is set out within the Quod Report (EB15) and the Hearing Statement for Matter 5: Economic Activity and Employment.

Part I: Provision for Gypsies and Travellers

2.66 Section 1 Plan Policy SP8 requires that the Garden Community will make provision for Gypsies and Travellers. Part I of GC Policy 1 takes this forward requiring the delivery of a new site for the accommodation of Gypsies and Travellers within the 'North Neighbourhood' to the south of the A120 and forming an integral part of the wider Garden Community.

2.67 The location and size of the site will be informed by the Councils 'Strategic Framework Masterplan' (EB1), and subsequent masterplanning prepared by the developer. A broad location for the 'Gypsy and Traveller Site' has been identified on the 'Policies Map' (CD2) which has been informed by the projected land use area, informed by the Colchester and Tendring Gypsy and Traveller Accommodation Assessments (CGTAA & TGTAA), and its location with good access to both the strategic road network, sustainable transport options and neighbourhood facilities to meet the needs of both those travellers who lead a nomadic life and those who have ceased to travel.

2.68 A number of representations submitted at Regulation 19 questioned the need for a new Gypsy and Traveller site within the Garden Community. The requirement for this provision within the DPD is established in the Section 1 Plan which has been adopted by the Councils and has already been subject to testing through Examination in Public and found sound. Further information on the provision and need for Gypsies and Travellers is set later in this Hearing Statement in response to the Question relating to Housing Need, and in the Hearing Statement for Matter 4: Buildings, Place and Character.

Part J: A133 Park and Choose Facility

2.69 Section 1 Plan Policy SP9 requires the provision of a park and ride facility at the Garden Community to mitigate the transport impacts of the development on the strategic and local road network. The provision of an integrated facility as required by GC Policy 1 will also support the DPDs objective that the Garden Community will be structured around a dense network of traffic-free walk, cycle and micro-mobility routes with the rapid transit service (RTS) prioritised and supported by a range of innovative mobility measures. This will make day to day trips shorter, quicker and cheaper without a car, and along with a high-quality public realm, good mix of uses and landscape, will ensure the Garden Community is a great place while delivering the ambitious mode share targets set out in the GC Policy 7.

2.70 GC Policy 1 and GC Policy 7 are aligned with the principles set out in national and local policy and guidance to achieve a high share of trips by active and sustainable modes of transport and with the requirement in the Section 1 Plan to introduce a package of measures including park and ride facilities. The policies are informed by the evidence set out in the 'Transport Evidence Report (2023) Part Two: Transport Measures' (EB20) and the Park and Choose facility will have an important role to play in achieving the mode share targets.

2.71 The location and size of the site has been informed by the Councils 'Strategic Framework Masterplan' (EB1), and will be defined further through subsequent masterplanning prepared

by the developer. Alternative broad locations for the Park and Choose Facility have been identified on the 'Policies Map' (CD2) to allow detailed modelling, assessment and masterplanning to achieve the most appropriate location to facilitate connection with the RTS and meet the specific requirements of GC Policy 7, Part F. Further information is set in the Hearing Statement for Matter 7: Movement & Connections.

2.72 The Councils consider the policy to be sound, however as detailed within the SoCG with the UoE (SCG04) a modification to the wording of GC Policy 1 Part F is suggested in the 'Schedule of Modifications' (CC4) which would require that, should the position of the Park and Choose be located south of the A133, its provision and position should be evidenced to demonstrate that it would not prejudice the expansion requirements of the UoE or the sports, leisure and open space requirements of the wider Garden Community.

Park K: Planning Application Requirements

2.73 GC Policy 1 Part K includes requirements for documents and information to be submitted in support of future planning applications. The right information is crucial to good decision making, particularly where formal assessments are required (NPPF Paragraph 43). In accordance with the NPPF, Local Planning Authorities should only request supporting information that is relevant, necessary and material to the application in question, those matters as outlined within GC Policy 1 Part K have therefore been carefully considered in the context of national policy, local requirements and context and proportionality to ensure required documentation is not overly onerous on the applicant.

2.74 Paragraphs 126-129 of the NPPF provide direction on achieving well-designed places with an emphasis on good design being key to achieving sustainable development. GC Policy 1 Part K requires that a comprehensive approach to masterplanning be adopted, including a site wide masterplan, detailed area specific masterplans and design codes for relevant phased developed. These must be informed by assessment frameworks such as the National Design Guide and the National Model Design Code.

2.75 The Councils consider that requirements in GC1 Part K are appropriately justified.

2.76 There were 62 representations on GC Policy 1 and the 'Policies Map' at Regulation 19, 44 of which were in objection. Many of these objections are relating to the principle of development which has been established through the Section 1 Plan and has therefore already been subject to testing through Examination in Public and found sound.

2.77 Where appropriate, representations have been addressed in the relevant sections of this Hearing Statement. Further representations were received with regard to health facilities, density of development, employment land and traffic. These have been addressed in the relevant Hearing Statements relating to these subject matters.

2.78 As set out above, the Councils consider that the spatial strategy for the Garden Community and the distribution of development is supported by robust evidence and is soundly based. The Councils consider that modifications could be considered through the Examination in Public to address some particular concerns. These are set out in detail in the 'Schedule of Modifications' (CC4).

Does the DPD deliver the quantum of housing consistent with the Section 1 and Section 2 plans regarding the quantum of homes i.e. setting a requirement of 7,500 new homes does GC Policy 1 make adequate provision to meet Tendring and Colchester's housing needs and does the plan clearly set out a delivery trajectory that is achievable?

2.79 The target (minimum requirement) for the quantum of new homes within the Garden Community for the period of the Section 1 and Section 2 Plans (2013-2033) is between 2,200 and 2,500 homes, as part of an expected overall total of between 7,000 and 9,000 homes to be delivered beyond 2033. The expected overall total has been refined through the DPD evidence base to circa 7,500 homes as defined by GC Policy 1. The DPD is not subject to a 'Plan Period', rather it aligns with the current adopted Section 1 and 2 Plans, which in accordance with NPPF para 22 requires Strategic policies to look ahead over a minimum 15-year period from adoption. Para 22 goes on to state that *"where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery".*

2.80 The Examination of the Section 1 Plan considered the issue of the timing of delivery and likely build out of the Garden Community. The Councils undertook research to consider the issues and set out the outcome of the research in a 'Build Out Rates Topic Paper' (North Essex Authorities, 2019). The Section 1 Inspector considered all the evidence and concluded that it would be prudent to plan on the basis of the site delivering an annual average of 250 dwellings per annum. The Inspector also considered that housing delivery could start within four or five years from the adoption date of Section 1 Plan, but also that this would need to be kept under review.

2.81 The Councils have updated work on the start date and trajectories to reflect the current circumstances. The current assumption is for homes to start being delivered in 2025/26 with the trajectory to provide for 200 homes per year each in yr1 and yr2, and thereafter to accord with the 250 per year figure. This means that the Garden Community will be delivered over a 30+ year period.

2.82 The trajectory therefore assumes a completion total of around 2,150 units by the end of the Section 1 and 2 Plan Periods, with a realistic onward delivery. However, there will be many influences on the actual rate of delivery and housing trajectory for a scheme of this size and nature. Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires a review of all local plans at least every five years. This legal requirement review of the DPD should take into account changing circumstances affecting the area, and any relevant changes in national policy.

2.83 The information set out therefore within the evidence base should be considered as a 'snapshot in time' and has been prepared in alignment with the Councils anticipated phasing as illustrated in the 'Strategic Framework Masterplan' (EB1). At this stage, the work in the evidence base as considered in particular as part of the 'Strategic Framework Masterplan' (EB1) and the 'Infrastructure Delivery, Phasing and Funding Plan' (EB17) shows how the Garden Community could come forward in phases, with key policy requirements established in the DPD. The Councils recognise however that the illustrative approach will be reviewed and updated as more detailed design and planning work is undertaken to define proposals and phasing, consider impacts and mitigation measures in relation to future planning applications.

2.84 The majority of the Garden Community site is now under the control of Latimer Developments Ltd. working in partnership with Mersea Homes. Latimer have assembled their technical team including masterplanners and have been constructively engaging with the Councils through formal pre-application procedures on preparing more detailed plans with a view to submitting proposals in early 2025. It is envisaged that Latimer will act as a 'master-developer', bringing the site forward, investing in strategic infrastructure, and enabling housing and development to be delivered by both themselves, Mersea Homes and by other housebuilders and developers. With the principle of development established by way of the Section 1 Plan, the Garden Community is considered 'deliverable' broadly in line with the Councils trajectory.

2.85 For the Section 1 Plan period up to 2033, housing delivery from the Garden Community, irrespective of its actual location, will be distributed equally between CCC and TDC. Both CCC's and TDC's Section 2 Local Plans assume that the Garden Community will deliver between 2,000 and 2,500 homes up to 2033. In doing so, both Local Plans demonstrate an over-supply of housing allocations against their Objectively Assessed Housing Need. These buffers allow a degree of headroom and flexibility in housing delivery over the Plan Period. Furthermore, the Councils will review and consider the basis to assumptions on the housing trajectory and contributions from the Garden Community towards meeting the respective needs of CCC and TDC when they undertake reviews of the respective Local Plans and in light of new and extended plan periods. This will be a matter to be considered under the Duty to Cooperate, with the statutory Joint Committee providing a mechanism for the Councils to consider and agree as the Garden Community and Local Plan Reviews come forward. Both Councils are progressing with the Local Plan Reviews in accordance with the published LDSs.

2.86 The Councils consider that the DPD has taken an appropriate and proportionate approach to the phasing and housing delivery trajectory of the Garden Community which aligns with the wider evidence base including the 'Infrastructure Delivery Phasing & Funding Plan' (EB17) and the 'Financial Viability Assessment Update' (EB24) which concludes that the proposals are viable and deliverable. Further information on meeting housing needs is set out within the Councils Written Statement on Main Matter 4 - Buildings, Place and Character.

Does the DPD adequately address the needs for all types of housing and the needs of different groups in the community (as set out in paragraph 62 of NPPF)?

2.87 Yes, the DPD makes appropriate provision for affordable housing, accommodation for gypsy and travellers, accessible and adaptable housing and housing to meet the needs of particular groups.

National Planning Policy Framework

2.88 Paragraph 62 of the NPPF states that within a context of assessing the minimum number of homes required in an area, 'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)'.

The DPD

2.89 GC Policy 1 provides the overall housing number of circa 7,500 which has refined the number of homes expected at the Garden Community towards the lower end of the Section 1 Plan range of 7,000 to 9,000. This DPD figure therefore addresses the need for housing and the detailed housing policies of the DPD address specific needs and types of housing.

2.90 Chapter 5 of the DPD (Buildings Places and Character) includes GC Policy 4 'Meeting Housing Needs' which covers all elements of housing relevant to the Garden Community, including a range of types of housing for a broad cross section of the community.

Local Housing Needs

2.91 To reflect the long-term delivery of the Garden Community, GC Policy 4 requires the proposed mix of dwelling types, sizes and tenure to reflect the latest available evidence of housing demand and need. The Councils consider this the most appropriate response to the delivery of housing over a 30+ year period which crosses authority boundaries.

2.92 Planning Applications should be accompanied by a Housing Strategy, Housing Mix Statement and Affordable Housing Phasing Strategy as required by GC Policy 4 Part I. Strategies will be kept under an ongoing review process and must be related to the phased implementation required through the masterplanning process required by GC Policy 1 Part K. This is to ensure that housing delivery effectively responds to need throughout implementation.

2.93 Strategies should be informed by the Councils' 'Strategic Housing Market Assessment' (SHMA), aligned with assessments of housing demand produced by the developer. The SHMA will be updated on a periodic basis; it responds to, and is compliant with, the requirements of the NPPF; in approach and structure it follows the Revised Planning Practice Guidance (PPG), in particular the paragraphs that address 'housing and economic needs assessments'. The SHMA is used by the Councils to:

- inform TDC and CCC housing requirements within the DPD;
- determine the need for affordable housing;
- inform wider housing policy in the DPD.

2.94 The SHMA covers all aspects of housing need and housing type relevant to TDC and CCC, considering demographic changes and the existing situation, and draws out recommendations for a wide range of housing requirements.

2.95 GC Policy 4 is proactive in seeking a balance between the type of housing that the evidence suggests is required to meet housing need, and the long-term context into which the Garden Community is set. The motivation for this is to ensure that the Garden Community and its neighbourhoods are mixed, balanced, healthy, and vibrant. The policy is sufficiently flexible to allow developers to respond to market demand whilst meeting the changing housing needs of the authorities over time. The policy does not take a prescriptive or rigid approach, and Part D 'Housing Density' allows a consideration of the context of the site, recognising that the neighbourhoods will have unique features that may require a more nuanced approach. This, however, does not automatically mean that the requirements and considerations of the policy should be cast aside.

Affordable Housing

2.96 The Councils expect affordable housing to be delivered in accordance with national policy and the DPD evidence base. GC Policy 4, which has been tested for viability and deliverability

through the 'Financial Viability Assessment Update' (EB24), seeks to provide at least 30% of all new homes across the garden community and within its neighbourhoods in the form of 'affordable housing'. In line with paragraph 65 of the NPPF at least 10% of the total number of homes will be expected to be provided for 'affordable home ownership'. The 'Financial Viability Assessment Update' has considered and tested the required level of affordable housing provision for the Garden Community in order to ensure that development proposals remain viable as per paragraph 58 of the NPPF.

2.97 The policy recognises the substantial need for low cost rented homes, but also aims to support those people with lower household incomes who would not qualify for social housing nor be able to afford market housing.

2.98 The policy therefore aims to deliver affordable housing in accordance with both national advice and local evidence that would aim to meet the needs of those most in need whilst also seeking to fulfil the need of those in the 'buy/rent gap' – those not eligible for social housing, yet not able to buy in the local market.

Adaptable and Accessible Housing Standards

2.99 There is an expectation for all new homes to be built to an adaptable standard, to allow them to be easily upgraded if or when residents' mobility needs change. GC Policy 4 Part C also requires that 10% of homes will need to be wheelchair accessible on construction. This policy covers a wide range of issues associated with accessibility and inclusivity which should ensure that housing in the Garden Community meets the needs of a diverse range of people. Considering inclusivity and accessibility broadly will enable all people to adapt their homes as they age without having to consider moving on. Providing homes that are suitable for people living with impaired mobility gives them a choice to remain living within their homes for longer and provides them with wider care options such as receiving domiciliary care instead of having to move to an institutional care setting, thus improving quality of life whilst also reducing pressures on adult social care and local health services.

2.100 Additionally, GC Policy 3 covers aspects of development that address design elements that contribute to an occupant's enjoyment of their living space (and arguably affect a person's mental or emotional wellbeing). This includes space standards, aspect, noise, ventilation and pollution, amenity space, security and tenure blindness, all of which can be addressed through thoughtful and considered design and architecture.

Care, Assisted Living and Other Specialist Housing

2.101 GC Policy 4 Part F deals with the needs of older people and those requiring specialist care accommodation (whether or not they are older) and ensures that they be provided as part of the overall mix of development located either within or adjoining each of the new centres. The size and specification will be determined by further Housing Strategies prepared by the applicant with planning applications.

Gypsy and Travellers

2.102 The NPPF sets out the Government's planning policies for England and how these should be applied. In respect of issues relating to the planning requirements of Gypsies and Travellers, particularly accommodation, the Framework should be read in conjunction with 'Planning Policy for Traveller Sites', which was published in August 2015.

2.103 Paragraph 62 of the NPPF says that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, which includes the needs of travellers.

2.104 The requirement of a Gypsy and Traveller site is based on the needs analysis within the individual Colchester and Tendring Gypsy and Traveller Accommodation Assessments (CGTAA & TGTAA). These identify the need for 18 pitches which will count equally (nine pitches respectively) towards TDC and CCC's projected need for such accommodation and will form an integral part of the wider Garden Community. The location and size of the site has been considered within the 'Strategic Framework Masterplan' (EB1), but its final location remains flexible through being identified as a 'broad location' on the DPD 'Policies Map' (CD2). The Gypsy and Traveller site will come forward in response to need, and its actual scale and siting will be defined through future planning applications. The Councils' assessment and need within both the Section 2 Plans and the DPD allocation has been based on the definition of Gypsy and Travellers as set out in the 2012 Planning Policy for Traveller Sites (PPTS) and includes those who have permanently stopped travelling.

Student Accommodation

2.105 GC Policy 1 Part B and GC Policy 4 Part H allow for the provision of student accommodation to be located in accessible locations within the 'South Neighbourhood' where it would have good sustainable links to the University of Essex (UoE) and where it will contribute to a mixed and diverse community.

2.106 The Councils sought an independent review of the UoE growth predications being the 'Wisher Report' (EB16). The evidence illustrates that there is a reasonable growth prospect of a further 10,000 students between 2025 and 2035. The University has aspirations to provide for up to 45% of student growth on land very close to or adjacent to the existing campus, but do not support the provision of student accommodation within the Garden Community Neighbourhoods. Further information on the UoE position is set out within earlier sections of this statement, within the Councils 'Land South of the A133 & University of Essex Topic Paper' (TP3), and the Statement of Common Ground between the Councils and the UoE (SCG04).

2.107 Further information on meeting housing needs is set out within the Council's Written Statement on Main Matter 4 - Buildings, Place and Character.

Does the DPD make adequate provision to contributing towards meeting Tendring and Colchester's economic growth requirements for the plan period and its timescale for delivery?

2.108 Yes, the DPD makes adequate provision to contributing towards meeting Tendring and Colchester's economic growth requirements for the plan period and its timescale for delivery.

2.109 Economic uses are defined within the DPD as comprising office, research and development, industrial uses, and storage and distribution. The objectively assessed needs for such uses within the Garden Community are set out in the 'Economic and Employment Study – Quod Report' (EB15), which in turn has been informed by the Section 1 and 2 Plans and associated former evidence base (Section 1 Examination Economic Evidence Base).

2.110 Policy SP8 of the Section 1 Plan requires the delivery of 7ha of employment land within the Plan period (2013-2033) with a total of 25ha of employment land delivered beyond 2033. The 25ha has been carried across to GC Policy 1 Parts A, G and H, whilst GC Policy 5 Part A seeks to achieve an appropriate balance of homes and jobs within the Garden Community with the aim of achieving a minimum of one job per household, either within or close to home, or within a sustainable commutable distance.

2.111 The updated economic growth projections within the 'Quod Report' (EB15), establish that the 25ha policy position is ambitious but achievable with the right intervention and planning. It also notes that the masterplan must be carefully designed in order to maximise demand for space on site. The Councils consider that the designation of employment land in the form of a new business park and a knowledge-based employment site in GC Policy 1 Parts A, G and H addresses the requirements of Policies SP8 and SP9 of the Section 1 Plan.

A120 Business Park

2.112 GC Policy 1 Part H and the 'Policies Map' (CD2) allocates approximately 17ha of land immediately south of the A120 for a new business park. The 'Quod Report' evidences that E(g)(ii)(iii), B2 and B8 uses are in demand and are expected to be able to be delivered and let quickly on site. This range of uses secured by GC Policy 5 Part B, in connection with ancillary business uses supports the wider placemaking objectives of the Garden Community, but also provides flexibility at the masterplanning stage.

2.113 Logistics is likely to drive the immediate demand for space in this location, with B2 uses including manufacturing and assembly also considered appropriate and deliverable. Given the market demand for these uses, and the existing transport connections, the evidence demonstrates that bringing them forward early on is likely to be achievable and this will support local economic development in the quickest and most efficient way.

2.114 The full realisation of the A120 Business Park will be dependent on the delivery of the A120-A133 Link Road (hereafter 'Link Road') and connectivity to the strategic road network through connection with the A120. Further consideration of delivery timing is outlined below in '*Delivery within the Section 1 Plan Period'* of this hearing statement.

Knowledge-Based Employment Land

2.115 GC Policy 1 Part G and the 'Policies Map' (CD2) allocates approximately 8ha of land north of the A133 for knowledge-based employment purposes to maximise the benefits arising from close proximity to the University of Essex and the existing 'Knowledge Gateway' currently being developed.

2.116 Given the long-term delivery of the Garden Community, supported by evidence within the 'Quod Report' (EB15), the Councils consider that Knowledge Based Employment Land in this location has the potential to effectively respond to changing economic and employment needs. Evidence suggests that the potential of the Knowledge-Based Employment Land is unlikely to be realised before the end of the Section 1 Plan period, but the land should be safeguarded and "meanwhile" uses can play a part in in establishing early occupiers and/or proving demand or land values.

2.117 The Councils consider that the DPD and its 'Policies Map' allows sufficient flexibility for future masterplanning and the structure of planning applications to respond to changing economic demands, whilst securing the long-term provision of high quality and skilled jobs.

Neighbourhood Centres

2.118 Office uses will most likely come forward integrated with other neighbourhood centre uses, serving a local catchment of SMEs and supporting home and flexible working. The North and South neighbourhood centres should support flexible E and F Class Uses to a achieve a critical mass of activity with a focus on sustainability, convenience and community uses. Early delivery of jobs will also come forward in social and community facilities, including schools, early years education and health/wellbeing provision, all phased with the delivery of housing ensuring that infrastructure and jobs support development in a timely and sustainable manner.

Delivery within the Section 1 Plan Period

2.119 Within the Section 1 Plan period the Councils consider that the delivery of 7ha by 2033 could be achieved through a variety of streams, including a focus on the northern A120 Business Park in the short term. The deliverability of the northern A120 Business Park is dependent in part on the A120-A133 Link Road (hereafter 'Link Road') with connection to the strategic road network at the A120. The Link Road benefits from an extant planning permission with the first phase funded through the Government's Housing Infrastructure Fund (HIF), construction is due to commence in 2024 with completion due in 2026.

2.120 This first phase of the Link Road will see a new roundabout created on the A133 east of the University of Essex, 1.8km of dual carriageway road and three junctions, between the A133 and a new 'Allen's Farm Roundabout'. The 'Allen's Farm Roundabout' would provide connectivity into the north A120 Business Park allocation area and would facilitate the Rapid Transit System connectivity from the Garden Community neighbourhoods. The second phase of the Link Road, providing connection onto the A120 and completing the link, would be funded by developer contributions secured through the S106 legal agreement associated with the future outline planning application for the Garden Community.

2.121 The master-developer for the Garden Community, being Latimer Developments Ltd, have committed to the full delivery of the new Link Road, connecting the A133 with the A120, in order to realise the full potential of the new Garden Community, and associated benefits to the surrounding area. Latimer has signed a 'Memorandum of Understanding' (EB18) with the Councils committing to fund the delivery of the second phase of the Link Road as soon as is practically and financially possible to do so. The funding for the second phase of the Link Road has been included within the Councils 'Infrastructure Delivery Phasing & Funding Plan' (EB17) and has been tested for viability and deliverability through the 'Financial Viability Assessment Update' (EB24).

2.122 Whilst the full delivery of the Link Road may delay the early deliverability of the north A120 Business Park, the Councils consider that the evidence does not preclude smaller scale offices within the neighbourhood centres and the southern Knowledge-Based Employment Land coming forward. The 'Financial Viability Assessment Update' (EB24) has included an allowance should there be a need to stimulate the market and/or undertake measures to attract occupiers, at least in the early stages as required GC Policy 5 Part A. The Councils have been advancing positive pre-application engagement with Latimer to ensure delivery of employment land is developed in tandem with homes.

2.123 Further information on economic activity and employment is set out within the Council's Written Statement on Main Matter 5 - Economic Activity and Employment.

END.