2 Support

Document Element: GC POLICY 2: NATURE
Respondent: Mr Kieran Franklin [22]

Summary:

I support the SuDS policy, in particular the policy of resisting the use of impermeable surfaces for driveways. Where possible, the councils should encourage the use of surfaces similar to Grasscrete for communal parking areas, as these offer good water permeability as well as increased green cover which benefits invertebrates.
Enhancements to the Colchester Orbital should pay particular attention to the link from the development site across Clingoe Hill to the Colne, and beyond towards the Distillery Pond. This link, and the link to the Wivenhoe Trail, could benefit from enhancements, and protection from further University development alongside the Colne.

Full text:

I support the SuDS policy, in particular the policy of resisting the use of impermeable surfaces for driveways. Where possible, the councils should encourage the use of surfaces similar to Grasscrete for communal parking areas, as these offer good water permeability as well as increased green cover which benefits invertebrates.
Enhancements to the Colchester Orbital should pay particular attention to the link from the development site across Clingoe Hill to the Colne, and beyond towards the Distillery Pond. This link, and the link to the Wivenhoe Trail, could benefit from enhancements, and protection from further University development alongside the Colne.

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments: None

9 Object

Document Element: GC POLICY 2: NATURE
Respondent: Mr Gary Plummer [23]

Summary:

How can the council say " Net Gains in biodiversity and a thriving ecological network will shape the Garden Community ensuring native species thrive". when it is concreting over acres of green belt land?
This land should be protected and allowed to thrive naturally as it is now.

Full text:

How can the council say " Net Gains in biodiversity and a thriving ecological network will shape the Garden Community ensuring native species thrive". when it is concreting over acres of green belt land?
This land should be protected and allowed to thrive naturally as it is now.

Change suggested by respondent:

The development is ridiculous and will kill our countryside, and it needs to be stopped.
THERE ARE NO NET BIODIVERSITY GAINS! the only way that biodiversity can continue is by not bulldozing the area and covering it in concrete.
Stop the development now.

Legally compliant: Yes
Sound: No
Comply with duty: Yes
Appear exam: Written Representation
Attachments: None

20 Object

Document Element: GC POLICY 2: NATURE

Respondent: Kathryn and Timothy Pugh [50]

Summary:

We have been horrified at the destruction of green space that has occurred as more and more dwellings are built. Our main concern until last year was the devastating loss of wildlife habitats that we already know are under severe threat. Now, with increasingly uncertain international affairs Impacting our food prices (and longer term security), surely farmland should be afforded extra protection to bolster our means of food production here in the UK. To build these 7,000 homes on green space while proudly promoting a "new" Country Park is self-congratulatory and In our opinion hypocritical. Yes, protect Salary Brook; yes, protect Churn Wood but go further: protect the fields, hedges, trees and ditches that provide homes to Important flora and fauna.

Full text:

We write to briefly outline apprehensions we have with the Colchester Borders Garden Community.

We have been horrified at the destruction of green space that has occurred as more and more dwellings are built. Our main concern until last year was the devastating loss of wildlife habitats that we already know are under severe threat. Now, with increasingly uncertain international affairs Impacting our food prices (and longer term security), surely farmland should be afforded extra protection to bolster our means of food production here in the UK. To build these 7,000 homes on green space while proudly promoting a "new" Country Park is self-congratulatory and In our opinion hypocritical. Yes, protect Salary Brook; yes, protect Churn Wood but go further: protect the fields, hedges, trees and ditches that provide homes to Important flora and fauna. We have read of plans for "at least one new secondary school and at least five primary schools." Well yes, we would expect nothing less for children and young people in our community. Worrying not to have read of any new medical centres which will-be vital to the whole community, especially given the increasing older population.

May we refer you to an article from July 2022 on the BBC News website - we would prefer to send a link but despite registering, we found the feedback portal unnavigable - which details how vital green spaces are In terms of physical health during heatwaves.

For the reasons above, we would prefer that this housing development be substantially reduced.

*Please see "It's like an oven': Life In Britain's hottest neighbourhoods." Harriet Bradshaw, Rob England and Deidre Finnerty BBC News 18 July 2022

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Appear exam: Not specified

Attachments:

29 Object

Document Element: GC POLICY 2: NATURE

Respondent: Miss Louise terry [30]

Summary:

There needs to be space for nature to breathe and to help us breathe. Without the fields, the bees, the animals, birds we will just be a country full of concrete and a village of pollution, illness, overworked, no work, no space for appointments kind of village. So please, is there anywhere I can object to this. I am sure my family will also object due to this being a family village.

Full text:

I have just received a leaflet through the door in regards to the garden community team regarding the new plans.

I am new to the area but have been coming here since I was a baby due to my Nan and grandad living here for over 30 years. I am currently living {REDACTED}

I am all with developments in bigger areas but I am highly angry now knowing that they are wanting to build in such a peaceful area. I moved here to be away from crime, over crowding, and just a built up area. It was hard enough for me to be able to get a job and at 23 years of age having to do an apprenticeship. I now have been at the hospital for 7 years and it's already under so much pressure and crowded with patients and to build more homes it'll just be a lot worse, especially when they have {REDACTED} down halstead hospital also.

It's hard enough to even get a GP appointment. I soon want to start a family but the pressure of trying to get your child into school will be hard with all these new developments. I moved to a village to Hope it stay a village for the peaceful, friendly people. I've lived in both types of areas and I can certainly agree on the village life. To know that this is happening makes me regret buying our first home in this lovely village with memories.

There needs to be space for nature to breathe and to help us breathe. Without the fields, the bees, the animals, birds we will just be a country full of concrete and a village of pollution, illness, overworked, no work, no space for appointments kind of village.

I am still having trouble trying to find a GP as it is and dentist around here so having to drive 30 minutes for an appointment is what I have to do.

So please, is there anywhere I can object to this. I am sure my family will also object due to this being a family village.

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments: None

30 Object

Document Element: GC POLICY 2: NATURE

Respondent: Gemma Robinson [54]

Summary:

Perhaps step away from your office and sit in your garden and see how lovely it is and then the council and developers saying "we are building a 'community ' of over 27,000 people, killing wild life and an A road that will create a lot of noise air pollution and disturbance and lots more and its only 1/2 mile away from your home!" How would that make you feel?.
Please do not ruin this county any more that you already have.
Its heartbreaking to think this will happen and ruin people's lives and health that already live nearby.

Full text:

Why do we need a link road?
Please do not say to reduce traffic when you are building the Garden community with 9000 homes averaging on over 27.000 people, not including the Industrial site, the traveller's site and shops.
If this monstrosity was NOT being built we would not need this link road!
A village meaning a "rural area" which this will be taken away from our village life! If I wanted to live in a built up area I would have stayed where I was before. But I moved to the country side meaning "the land and scenery of a rural area" which is now being taken away from us and children! Of Elmstead Market Village.
I can not understand if this goes ahead which I pray to God that it doesn't, why an unfinished road that is costing £50 Million to build when the whole county/ country is in poverty! And just because the council have a "pot" of money that you "need" to use otherwise it goes to another county , is not acceptable!.
Distribute the money out to those that need it and will change lives for the better! This is disgraceful behaviour from the council!.
Perhaps step away from your office and sit in your garden and see how lovely it is and then the council and developers saying "we are building a 'community ' of over 27,000 people, killing wild life and an A road that will create a lot of noise air pollution and disturbance and lots more and its only 1/2 mile away from your home!" How would that make you feel?.
Please do not ruin this county any more that you already have.
Its heartbreaking to think this will happen and ruin people's lives and health that already live nearby.

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments: None

35 Object

Document Element: GC POLICY 2: NATURE

Respondent: James Chable [55]

Summary:

from a personal point of view I am not overly concerned that the Elmstead country side is being buried in bricks and concrete by the time it is complete me like a lot of other residents would have moved away to somewhere that developers can't make their millions in profits without putting the residents before profits. is always the best policy so be more transparent on how building 7500 houses actually helps a community without including infrastructure. Not to mention additional air pollution in such a tight area

Full text:

I am sending my comments on garden communities, though I don't believe they will be heard.

I agree that new housing helps, however 7,500 come on!! Garden community has started building these houses in Elmstead Market prices ranging from £350,000 to £500,000 anyone with any common sense knows this is out of middle class price range, oh but there are some social houses incorporated in the build, I'm guessing 3 per cent. The garden community is a developers paradise for an upper class community, there are 3 estates built around me now without any infrastructure at all, so doctor surgeries none incorporated in the planning schools none incorporated in the planning roads no new roads built to take the ever increasing traffic, the tcb can gloss the website as much as they like but action speak louder than words, from a personal point of view I am not overly concerned that the Elmstead country side is being buried in bricks and concrete by the time it is complete me like a lot of other residents would have moved away to somewhere that developers can't make their millions in profits without putting the residents before profits. Honesty is always the best policy so be more transparent on how building 7500 houses actually helps a community without including infrastructure. Not to mention additional air pollution in such a tight area

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Appear exam: Not specified

Attachments: None

41 Object

Document Element: GC POLICY 2: NATURE

Respondent: Mrs Carolyn Mason [64]

Summary:

Crockleford has already been identified as having special characteristics within an agricultural/historical setting. It will be destroyed by the proposed 1000/1200 houses. Extend public access to a larger country park covering the whole of Crockleford, retaining some land for local food production. This is some of the best growing land in the country. The landscape and rural nature will simply not be replaced by any amount of biodiversity net gain! It already exists! Think creatively about how food can be grown locally by local people and use the land already there. Don't cover it in dense housing development.

Full text:

Crockleford has already been identified as having special characteristics within an agricultural/historical setting. It will be destroyed by the proposed 1000/1200 houses. Extend public access to a larger country park covering the whole of Crockleford, retaining some land for local food production. This is some of the best growing land in the country. The landscape and rural nature will simply not be replaced by any amount of biodiversity net gain! It already exists! Think creatively about how food can be grown locally by local people and use the land already there. Don't cover it in dense housing development.

Change suggested by respondent:

There has already been land irreversably lost along Salary Brook to unsustainable large housing development. Land that was once part of the ancient valley of Salary Brook and access by all to enjoy the wildlife and flora. This should be compensated for by committing to extending the country park further. Extend the size of the country park into Crockleford.
The Garden Community should mazimise the amount of land provided for local food production around Crockleford. This is top quality land that is at risk of being lost forever, at a time of climate crisis, when our country should be looking at safe and sustainable food production. Innovative ways could be developed to provide sustainable food sources for local people that could also provide local employment opportunities.

Legally compliant: Yes
Sound: Yes
Comply with duty: Yes
Appear exam: Written Representation
Attachments: None

47 Object

Document Element: GC POLICY 2: NATURE

Respondent: Ria Lockwood [71]

Summary:

Officers Summary:Elmstead has many elderly residents who have lived here for many years, its a beautiful picturess village when entering, the drive from Colchester is lovely and green why do you feel you need to change this???

Elmstead and surrounding villages should be left alone and kept how they have been over centuries these developments cause upset and heart ache to local people who have seen the changes over the years loss of wildlife and woodland. This has been a major worry with all the new homes being built everywhere the only thought is about money and no consideration for local people and their families this is a huge concern as I believe the residents should have their say and this should be listened too. The noise and dust is not acceptable for residents to have to live with.

Full text:

To whom this may concern

I am writing this email to give my opinions and objections as to why I feel and many other Elmstead residents are against the new Development planned on the Colchester/Tendering boarder.

1. This would cause a huge amount of traffic influx in a small village community this would Cause more congestion as well as pollution this would then also cause back log of traffic that would build up along the A133 which is busy enough during rush hour both am & Pm this would cause more traffic coming into Elmstead making this road more of a danger than it already is. I have young children who attend the local school in Elmstead and crossing the road of the A133 can sometimes take up to 6-7 minutes due to no crossing that has been promised for many years. This causes danger for small children the roads are busy enough without adding more oncoming and outgoing traffic.

2. Myself and many new residents of Elmstead have moved here for the country peaceful life where its a community everyone is friendly its peaceful easy access into town however far enough away for families to feel safe. I am happy to let my children play outside and I live in a small close where they do feel safe this development would change Elmstead for the worst.

3. The noise and building traffic this development would cause in such a beautiful area there is so many new housing developments going up everywhere there is too many as it is the noise and dust is not acceptable for residents to have to live with.

4. Elmstead has many elderly residents who have lived here for many years its a beautiful picturess village when entering in either direction, the drive into Elmstead from the direction of Colchester is lovely and green why do you feel you need to change this??? Why do you have to join Tendering with Colchester?? Making Greenstaed part of the village?? Greenstead has a very high crime rate this will spread further and further into the suburbs. Causing run down parts of the area bringing the wrong type of people into such a well loved area.

5. Traveller site??? Why there is no reason this has to be here they are known to cause lots of rubbish and destruction to their own living environment as well as again I mention attracting more crime to areas of elderly and families this seems like a really un thought about idea which needs to be re considered.

6. 9000 new homes not 7,500 as previously mentioned where on earth are these families going to register with a doctors, dentists??? Schools???? this is a very large number of homes for such a small area is this necessary?

7. An industrial site placed next a village church that has been there since the 18th would completely change the beauty of this church that looks out into the most beautiful country side of all green.

8. Colchester is a busy enough town to have any more property developments everywhere you go you sit in traffic upon traffic its absolute chaos, this will just over populate the areas surrounding. Elmstead and surrounding villages should be left alone and kept how they have been over centuries these developments cause upset and heart ache to local people whom have seen the changes over the years loss of wildlife and woodland.

9. Loss of homes for wildlife has been a major worry over the years with all the new homes being built everywhere it just seems today's world all is thought about is money and no consideration for local people and their families this is a huge concern as I believe the local residents should have their say and this should be listened too.

10. Elmstead is a well loved community with residents having lived here the majority of their lives. Money should be put into areas to improve them for example a zebra crossing across the A133 from Affells road to make it safer and easier to access the local school. A speed camara at the start of the village to slow down incoming vehicles that speed through the village there is lots of children in Elmstaed and is a major worry to parents. Resurfacing roads reducing the pot holes this list is endless.

I hope these are taking in to consideration, and looked into my objections as well as many others. KEEP ELMSTEAD A VILLAGE KEEP IT SEPERATE FROM COLCHESTER.

Thankyou myself and Elmstead look forward to your reply.

Miss R Lockwood

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments: None

67 Support

Document Element: GC POLICY 2: NATURE

Respondent: Sport England (Mr Roy Warren, Planning Manager) [90]

Summary:

The policy is supported for various reasons listed in the full comments.

Full text:

• The requirements for a multi-functional green-blue infrastructure network is welcomed as this would offer opportunities for active recreation by a range of different users;
• The proposal in part A for the 'Nature Layer' to be co-ordinated with active travel networks to maximise the potential for routes through green infrastructure is welcomed as this will encourage physical activity
• The enhancement of the Colchester Orbital is supported as this would encourage walking and cycling for leisure purposes beyond the development;
• The requirement in part G for SuDS to create high quality public open space and landscaped public realm by providing viewpoints, footpaths, seating and signage is welcomed as this will support SuDS becoming a recreational destination that will encourage physical activity to access them.
• The requirement in part I for proposals to demonstrate how the scheme reflects and complies with the Colchester Tendring Open Space Strategy requirements and the Healthy Living and Play Strategy is welcomed as this will help demonstrate how nature and recreational objectives will be delivered in practice.

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments: None

86 Object

Document Element: GC POLICY 2: NATURE

Respondent: Mr David Mead [27]

Summary:

•Nature and biodiversity are likely to be enhanced if housing development does not proceed.
•It is not clear how the safety of public spaces will be assured, and anti-social behaviour managed.
•Churn Wood is shown on the Framework Plan, but it is not made clear this is privately owned and does not have public access.
•What is an edible walkway – a licence to steal apples?
•How will community gardens be managed and maintained? If this is not clear these areas could become a focus for anti-social behaviour.
•This chapter of the DPD demonstrates an idealised and unrealistic approach to the relationship between people and nature. Many of the prospective residents of the GC may have little experience and knowledge of nature and little desire to develop such knowledge.

Full text:

Compliance:
I consider that the Development Plan Document is Legally compliant.
It is not sound for the reasons stated below.
I consider that the document complies with the statutory duty to co-operate, but the consultation process using the engagement website is overly complex and biased. It seems likely that many people will have been deterred from participation in the consultation by these arrangements.

I would be pleased to participate in the oral part of the examination if this would be of assistance.

GC Policy 1: Land Use and Spatial Approach.

• The Garden Community Principles unproven. The GC vision overly aspirational and adopts a naive perception of the way in which communities are established and of human behaviour. The latter is not simply determined by environment.
• The GC is unlikely to address a local housing need, unless a greater proportion of rented housing is included. The present proposed approach will encourage further migration from the London suburbs, by the property wealthy whose pattern of work has changed post Covid-19.
• Many prospective residents of the GC will not be seeking local jobs, they will be occasionally commuting to London and working from home.
• Unrealistic assumptions are made in relation to the extent to which private car usage will be reduced by the RTS and

other more sustainable transport initiatives.
• The practicalities of community ownership are unclear.
• Shared ownership and rented housing should be included in the DPD as separate categories and the possibility of transferring from rent to shared ownership should be included.
• I was told at a consultation event that environmental requirements for new homes cannot exceed current building regulations, this is not clear from the DPD, which suggests the environmental requirements will be much higher.
• The neighbourhood map does not clearly distinguish between the North and Crockleford neighbourhoods.
• The development of the TCBGC does not justify the concreting over of a large part of rural northeast Essex.
• It does not seem logical that two proposed garden communities in north Essex were not considered to be viable, while the TCBGC is considered viable.

Policies Map:

• The need for 7,500 new homes in north Essex is not clearly established.
• A development on the Bromley Road has recently been curtailed because the developer's expectation of potential sales has been reduced. Properties have also been sold to a London Borough to house homeless families.
• 1,000 to 1,500 new homes on Crockleford Heath will adversely impact on the special character of the area.
• The need for Knowledge Based Employment Land is not established, many the existing units at the University for Knowledge Based Employment remain vacant.
• The need for provision for Gypsies and Travellers is not supported by evidence.
• The term Green Links is not clearly defined. Are these for wildlife or walkers and cyclists? How wide are these corridors? A minimum of 100m may be appropriate.
• While Wivenhoe and Elmstead are provided with Strategic Green Gaps, why is no Green Gap provided for Crockleford Heath to preserve the special character of the area?
• The present proposals suggest that housing development to the south of the Bromley Road will encroach on Crockleford Heath. A Green Gap of at least 100m may be appropriate. Alternatively, given the high volume of traffic it may be appropriate not to develop any housing to the immediate south of the Bromley Road.

Policy 2: Nature.

• Nature and biodiversity are likely to be enhanced if housing development does not proceed.
• It is not clear how the safety of public spaces will be assured, and anti-social behaviour managed.
• Churn Wood is shown on the Framework Plan, but it is not made clear this is privately owned and does not have public access.
• What is an edible walkway – a licence to steal apples?
• How will community gardens be managed and maintained? If this is not clear these areas could become a focus for anti-social behaviour.
• This chapter of the DPD demonstrates an idealised and unrealistic approach to the relationship between people and nature. Many of the prospective residents of the GC may have little experience and knowledge of nature and little desire to develop such knowledge.

Policy 3: Place Shaping Principles.

• This chapter is commendable, but highly aspirational. It is not clear how quality of life, livability, equitable prosperity, and social cohesion are to be achieved in practice.
• Communities are not created by distinctive buildings. It is difficult to envisage that the TCBGC will not simply be another large housing development.
• There is a limit to which environment can have a positive impact on societal behaviour and crime can be designed out. Crime is a variable feature of human behaviour. It also reflects the quality and level of policing and other factors.

Policy 4: Meeting Housing Needs.

• There has been significant housing development around Colchester in recent years. Predominantly this has not met a local housing need, but has fuelled movement of people from other areas, particularly London It is difficult to imagine that if it proceeds the TCBGC will not have a similar pattern of home ownership.
• Residents on low income are likely to seek rented housing, from a provider of social housing and in this respect the chosen developer may be well placed to meet this need.
• To conflate shared ownership and rented housing in 30% figure for affordable housing is misleading. A greater proportion of rented housing may be necessary to meet local need.

Policy 5: Economic Activity and Employment.

• The objective of achieving one job per household in or near the garden community may be ambitious and will be dependent on factors such as the overall economic picture.
• It seems likely that a significant proportion of prospective residents will be employed in London and working remotely

from home some of the time.

Policy 6: Community and Social Infrastructure.

• This section of the DPD is highly aspirational. Dependent upon the level of stewardship and management, what may emerge in practice could be very different.
• It is not clear whether multifunctional community buildings include the provision of healthcare services. This may be difficult to achieve in practice, given specialist medical needs.
• Management and longer-term stewardship of community provision of this nature could be clearer in DPD.

Policy 7: Movement and Connections.

• This policy section assumes that residents of the GC will adopt significantly reduced use of personal private cars. This may not be a realistic assumption.
• Similarly, neighbourhood delivery hubs will not be viable if residents choose to do their shopping outside of the neighbourhood centres by car in local supermarkets.
• The RTS will be operating on roads into Colchester City and will be subject to the same traffic delays as exist currently.

Policy 8: Sustainable Infrastructure.

• This policy is commendable but does not seem to be reflected in in the design requirements for buildings in the GC.

Change suggested by respondent:

-

Legally compliant: Yes
Sound: No
Comply with duty: Yes
Appear exam: Appearance at the examination
Oral exam why: I would be pleased to participate in the oral part of the examination if this would be of assistance.
Attachments: None

98 Support

Document Element: GC POLICY 2: NATURE
Respondent: Affinity Water (Mrs Hannah Wilson, Environmental Planner) [108]

Summary:

Affinity Water welcomes the reference in Part G to the use of SuDS in conjunction with water efficiency measures. Rainwater reuse can be used effectively for residential and non-residential development and will help reduce the potable water demand.

Full text:

Affinity Water welcomes the reference in Part G to the use of SuDS in conjunction with water efficiency measures. Rainwater reuse can be used effectively for residential and non-residential development and will help reduce the potable water demand.

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments: None

105 Support

Document Element: GC POLICY 2: NATURE

Respondent: Essex County Council (Mr Matthew Jericho, Spatial Planning and Local Plan Manager) [115]

Summary:

ECC supports the vision and policy. The Draft Plan has integrated multifunctional green infrastructure / natural environment / green spaces throughout, and it aligns with the Essex Green Infrastructure Principles and Standards, 2022. To strengthen the Draft Plan, applicants should have regard to the use of the Essex Green Infrastructure Standards, 2022 published in the Essex Design Guide in order to facilitate securing multifunctional green infrastructure. The standards have been supported and endorsed by Natural England, were prepared in consultation with all Essex local authorities (including Colchester City and Tendring District councils), and align with the National Green Infrastructure Framework.

Full text:

ECC welcomes and supports the vision for the natural environment to be the Garden Community's most valuable asset; in that nature will be placed at the centre of development to contribute and deliver environmental, health and wellbeing and economic benefits for people and wildlife.

The Draft Plan has integrated multifunctional green infrastructure / natural environment / green spaces throughout relevant chapters and polices, and it aligns with the Essex Green Infrastructure Principles and Standards, 2022. The Draft Plan meets the requirements set out in paragraphs 20, 92, 154, 175 and 186 of the NPPF by protecting existing and providing and maintaining GI to deliver multiple functions and benefits from the beginning.

On behalf of the Essex local authorities, ECC has established a Local Nature Partnership covering Greater Essex and is leading on the development of the Essex Local Nature Recovery Strategy. The strategy is a statutory requirement from the Environment Act and will comprise maps and proposed actions for nature's recovery that the Garden Community can contribute to, and applications will have regard to.

To strengthen the Draft Plan, applicants should have regard to the use of the Essex Green Infrastructure Standards, 2022 published in the Essex Design Guide in order to facilitate securing multifunctional green infrastructure. The standards have been supported and endorsed by Natural England, were prepared in consultation with all Essex local authorities (including Colchester City and Tendring District councils), and align with the National Green Infrastructure Framework. This framework includes a Developers and Design Teams Green Infrastructure process journey.

It is recommended the following is inserted as the last sentence in GC Policy 2, Part B:

“Proposals should have regard to the Essex Green Infrastructure Principles and Standards, 2022”.

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments: None

106 Support

Document Element: GC POLICY 2: NATURE

Respondent: Essex County Council (Mr Matthew Jericho, Spatial Planning and Local Plan Manager) [115]

Summary:

Part B (Page 39). Green roofs are refenced twice in this section – in the second and fourth lines i.e., “green walls and roofs” and then “green roofs”. It is recommended that the second reference to “green roofs” is deleted and replaced with “dual purpose street furniture”. The design of street furniture and bin stores can add character to the landscape, reduce clutter, and benefit biodiversity.

Full text:

Part B (Page 39). Green roofs are refenced twice in this section – in the second and fourth lines i.e., “green walls and roofs” and then “green roofs”. It is recommended that the second reference to “green roofs” is deleted and replaced with “dual purpose street furniture”. The design of street furniture and bin stores can add character to the landscape, reduce clutter, and benefit biodiversity.

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments: None

107 Support

Document Element: GC POLICY 2: NATURE

Respondent: Essex County Council (Mr Matthew Jericho, Spatial Planning and Local Plan Manager) [115]

Summary:

It is welcomed that the overall policy wording for GC Policy 2 has been strengthened from the Regulation 18 Draft Plan (Spring 2022), demonstrating the commitment for the protection and provision of green infrastructure throughout the Garden Community. However, a further change is recommended to strengthen the policy.

Replace "should" with "will need to" in the last sentence of GC Policy 2: Part E (page 41):

“Areas for planting or regeneration will need to be set out and agreed in the appropriate landscape and green-blue infrastructure strategies and management plans.”

Full text:

It is welcomed that the overall policy wording for GC Policy 2 has been strengthened from the Regulation 18 Draft Plan (Spring 2022), demonstrating the commitment for the protection and provision of green infrastructure throughout the Garden Community. However, a further change is recommended to strengthen the policy.

Replace "should" with "will need to" in the last sentence of GC Policy 2: Part E (page 41):

“Areas for planting or regeneration will need to be set out and agreed in the appropriate landscape and green-blue infrastructure strategies and management plans.”

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments: None

111 Object

Document Element: GC POLICY 2: NATURE

Respondent: Mr Shaun Raven [37]

Summary:

The GC and its additional traffic will lead to a severe Impact on air quality in the general area - and both the residents of Elmstead and the GC will suffer for It.

Full text:

Response to updated plans - proposed development Tendring Garden Community

To whom It may concern,

When the original online consultations were proposed, I took part. I filled in the questionnaires, I watched and waited.

Now it appears, the final consultations are upon us - and as expected, the residents of Elmstead have seen their objections to this development ignored or overridden.

Firstly, the plans for the new road between the A133 and the A120 seem to have elther been forgotten, or now stand to be delayed until the first phase of building (at the Elmstead end naturally) is complete. We already deal with constant delays throughout the day on the A133 at Clingoe Hill, and on the Hythe in Colchester. Adding 7500 new homes without an additional road to take some of the burden is madness, and we have already seen results of this sort of bad planning around the areas of North Station and the northern approach - both of which can easily become unusable at certain times of the day.

There have been proposals for new rail and bus links to take the extra load, but nothing concrete - and let us be honest, in a time of cost cutting (which we have already seen In these plans) it is unlikely we will ever seen these links come to fruition. All of which will add additional load to the traffic system which is already creaking at the seams. Let us not forget the planned reduction In parking spaces in the garden community (to allow even more housing) which will lead to cars being parked on green areas and pavements. Those cars WILL be there, because the residents of the garden community WILL need them as all the places they will need to go will be on the outskirts of Colchester - because Colchester City Centre is dying, and all the shops and services you really NEED are relocating to the outskirts.

All of this will lead to a severe Impact on air quality in the general area - and both the residents of Elmstead AND the garden community will suffer for lt.

If (as expected) the first wave of building goes ahead at the Elmstead end, what happens to the local community services? Yes, we know that the proposal says there will be new schools, shops and a surgery, but these will not be in place straight away - if at all. Elmstead has one small general shop and a garage shop, and that is it. It has one Surgery which is already stretched, and one primary school - all of which will struggle to cope with an increase of the population, which is already occurring in other areas being developed around Elmstead.

It is Interesting that Tendring is proposing this garden community at the furthest point on Its borders, where it knows that most of the impact will be taken up by Colchester/Elmstead and Wivenhoe, Tendring says it has an obligation to provide homes for its community, but none of these homes will be in the reach of the average community buyers as they'll be priced too high (just look at the new housing estates off the Cowdrey Avenue in Colchester), so most of the buyers will be either private landlords or people from outside the community where wages are higher. Guess what, the population expands, rather than relocates.

By the way - Garden Community? Are you serious? This is going to be a high-density housing estate, poorly designed and poorly executed. Whoever the planners/designers/authorisers are, they obviously will not be living there - if they were, it would not even be considered.

Oh, and let us not even get started on the idea of Industrial parks located 1/2 a mile from Elmstead Church, near the A120 - with no link road. Where will their traffic go - oh the A133 again. Oh dear.

It all adds up to a poorly thought out, poorly planned and poorly executed proposal. The most annoying this about it is that whatever objections are raised, we will be told "there's no alternative" and it will go ahead - and ruin this area. I am writing this because I want my objections on record, because in the long run, It's the only option I have available to me. No-one at Tendring will listen, and no one cares - because at the end of the day It does not really affect them.

I really hope that my concerns never happen - because if they do, both the residents of Elmstead and the proposed residents of the Garden Community will suffer.

One last thing. Just how difficult is it to raise concerns on this project? I am sending this via post because the design on your online portal is biased and flawed. It's designed in such a way to make inputting any comments difficult (unless you're moderately computer savvy - I'm a computer programmer, and the experience was frustrating to say the least, god knows how anyone else manages to make comments), and actually getting into the portal requires registering using a poorly designed registration screen where it's easy to hit the wrong button, I suggest your web developers attend some web interface design courses where you learn to make sites usable, not just pretty.

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified

Appear exam: Not specified

Attachments:

120 Object

Document Element: GC POLICY 2: NATURE

Respondent: Woodland Trust (Ms Nicole Moses, Campaigner - Woods Under Threat) [122]

Summary:

The Woodland Trust holds concerns regarding the proposed Garden Community Plan as there is potential for detrimental impact and disturbance to numerous areas of ancient woodland. Secondary woodland should also be retained to ensure that ecological networks are maintained and enhanced.

Full text:

As the UK's leading woodland conservation charity, the Woodland Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering over 30,000 hectares and we have over 500,000 members and supporters. We are an evidence-led organisation, using existing policy and our conservation and planning expertise to assess the impacts of development on ancient woodland and ancient and veteran trees.

The Trust is concerned about the following ancient woodlands which are sited within the proposed plan area:
- Walls Wood ASNW (grid reference: TM03802728)
- Churn Wood ASNW/PAWS (grid reference: TM03582580)
- Unnamed ASNW at TM03522537
- Home Wood (grid reference: TM03212486)
- Strawberry Grove (grid reference: TM05222650) (unmapped ancient woodland)

Ancient Woodland
Natural England and the Forestry Commission, the Government's respective bodies for the natural environment and protecting, expanding and promoting the sustainable management of woodlands, define ancient woodland as follows within their standing advice1:
"Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. It is a valuable natural asset important for: wildlife (which include rare and threatened species); soils; carbon capture and storage; contributing to the seed bank and genetic diversity; recreation, health and wellbeing; cultural, historical and landscape value. It has been wooded continuously since at least 1600AD. It includes:
• Ancient semi-natural woodland [ASNW] mainly made up of trees and shrubs native to the site, usually arising from natural regeneration.
• Plantations on ancient woodland sites – [PAWS] replanted with conifer or broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi"

Both ASNW and PAWS woodland are given equal protection in government's National Planning Policy Framework (NPPF) regardless of the woodland's perceived condition, its size, or features it contains.

Planning Policy
The National Planning Policy Framework, paragraph 180, states: "When determining planning applications, local planning authorities should apply the following principles:
c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons63 and a suitable compensation strategy exists;"

Footnote 63, defines exceptional reasons as follows: "For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat."

Impacts on ancient woodland
The Government's Keepers of Time Policy Paper2 (2022) recognises that "ancient and native woodlands and ancient and veteran trees support high levels of biodiversity. They are home to a quarter of England's priority species for conservation. They also deliver many ecosystem services including water and soil regulation, carbon storage, support for people's wellbeing and their long-standing cultural values."

When land use is significantly intensified such as in this situation, woodland plant and animal populations are exposed to environmental impacts from the outside of a woodland. In particular, the habitats become more vulnerable to the outside influences, or edge effects, that result from the adjacent land's change of use. These can impact cumulatively on ancient woodland - this is much more damaging than individual effects.

We are specifically concerned about the following impacts to the ancient woodlands should development be proposed adjacent to the ancient woodland boundary:
• Intensification of the recreational activity of humans and their pets can result in disturbance to breeding birds, vegetation damage, trampling, litter, and fire damage.

• Fragmentation as a result of the separation of adjacent semi-natural habitats, such as small wooded areas, hedgerows, individual trees and wetland habitats.
• Noise, light and dust pollution occurring from adjacent development, during both construction and operational phases.
• Where the wood edge overhangs public areas, trees can become safety issues and be indiscriminately lopped/felled, resulting in a reduction of the woodland canopy and threatening the long-term retention of such trees.
• Adverse hydrological impacts can occur where the introduction of hard-standing areas and water run-offs affect the quality and quantity of surface and ground water. This can result in the introduction of harmful pollutants/contaminants into the woodland.
• Development can provide a source of non-native and/or invasive plant species and aids their colonisation of the woodland.
• Where gardens abut woodland or the site is readily accessible to nearby housing, it can result in boundary issues between landowners, such as adjacent landowners extending garden areas into the woodland or dumping garden waste into the woodland. Natural England and Forestry Commission have identified impacts of development on ancient woodland within their standing advice (please see the Annex at the foot of this document for the full range of impacts outlined). This guidance should be considered Government's position with regards to development impacting ancient woodland, although Natural England and Forestry Commission should still be consulted directly.

Mitigation
Detrimental edge effects have been shown to penetrate woodland causing changes in ancient woodland characteristics that extend up to three times the canopy height in from the forest edges. As such, it is necessary for mitigation to be considered to alleviate such impacts.
Additional mitigation approaches are also outlined in our Planners' Manual3; these measures would help ensure that the development meets policy requirement and guidance and include:
- Retaining and enhancing natural habitats around ancient woodland to improve connectivity with the surrounding landscape.
- Measures to control noise, dust and other forms of water and airborne pollution.
- Sympathetic design and use of appropriate lighting to avoid light pollution.
- Producing and funding an access management plan for the woodlands, and/or providing alternative natural greenspace to reduce additional visitor pressure.
- Introduction of sympathetic management for neglected woodlands or trees.
- Implementation of an appropriate monitoring plan to ensure that proposed measures are effective over the long term and accompanied by contingencies should any conservation objectives not be met.

It is also important that an arboricultural impact assessment is undertaken early within the planning process, to ensure that ancient and veteran trees are identified and accounted for as the development proposals are refined. This will ensure that appropriate protection can be incorporated into the design. We would recommend that a review of the Trust's Ancient Tree Inventory4 is undertaken to identify any ancient, veteran and notable trees within the site boundary which may pose a constraint to the scheme.

Buffering
Buffering ancient woodland can be an ideal mitigation measure as buffer zones can be used to establish distance between the development and habitat, which helps to alleviate harmful impacts, while also creating new areas of habitat around the ancient woodland. Natural England and Forestry Commission have also produced guidance on mitigation measures to alleviate impacts to ancient woods and trees within their standing advice (please see the Annex at the foot of the document).

Development must be kept as far as possible from ancient woodland, with a buffer area of at least 50 metres maintained between the ancient woodland and the development boundary. Natural England and Forestry Commission's standing advice states that "the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic." Further information on buffer zones is outlined in the annex below.

Conclusion
The Woodland Trust holds concerns regarding the proposed Garden Community Plan as there is potential for detrimental impact and disturbance to numerous areas of ancient woodland. Secondary woodland should also be retained to ensure that ecological networks are maintained and enhanced.

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments:
Woodland Trust - https://tcbgardencommunity.oc2.uk/a/9

122 Support

Document Element: GC POLICY 2: NATURE

Respondent: Anglian Water Services Ltd (Ms Tessa Saunders, Spatial Planning Advisor) [40]

Summary:

Anglian Water is supportive of the policy requirements for biodiversity net gain which can help provide additional habitat enhancements and climate resilience for the new Garden Community. Part G policy requirements for sustainable drainage systems and green-blue infrastructure are considered to be an essential foundation for good place-making and Anglian Water supports the reference for SuDS to be used in conjunction with water efficiency measures. The multi-functional benefits of SuDS, including rainwater/stormwater harvesting and reuse, means that SuDS have a critical role in not only reducing flood risk but also for climate resilience and sustaining water resources.

Full text:

Part D: Biodiversity Net Gain

Anglian Water is supportive of the preference for biodiversity offsetting to be located within the Garden Community to provide additional enhancement to the community as a whole and ensure greater resilience to the impacts of climate change. There are positive benefits for habitat enhancement to be incurred through linking with opportunities presented by Local Nature Recovery Strategies.

Part G: Sustainable Drainage Systems and Blue Infrastructure

Anglian Water welcomes a robust and comprehensive approach to sustainable drainage systems (SuDS) for the garden community, which represents the multi-functional benefits that can be achieved by designing in green-blue infrastructure (including SuDS) as a framework for the overall design of the community and as a foundation for good place-making. We particularly support the reference for SuDS to be used in conjunction with water use efficiency measures and the hierarchy of managing surface water drainage, which prioritises reuse. Where rainwater/stormwater harvesting can be utilised for non-potable uses in new development (residential and employment) this helps reduce potable water use and generate efficiencies not only in water use, but carbon used to store, treat and supply potable water to properties. SuDS have a critical role in not only reducing flood risk, but also for climate resilience and sustaining water resources.

The links in the written justification to GC Policy 8 are welcomed. Whilst a drainage plan and SuDS management and maintenance plan for the whole area is supported – Anglian Water recommends that this is closely linked to the over-arching green and blue infrastructure framework so that the multi-functional benefits and opportunities can be maximised.

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments: None

132 Object

Document Element: GC POLICY 2: NATURE

Respondent: Mrs Sarah Chandler [93]

Summary:

I doubt that the new Country Park at Salary Brook and provision of Suitable Accessible Natural Greenspace (SANG) will have significant impact on reducing trips to the Essex coast. The environments are different and individuals need to have a wide range of leisure and recreational activities to maintain optimum physical and mental health. Focus should be on sustainable transport and safe cycling routes to enable visits to local places of interest, e.g. Tenpenny Hill on the B1027. Other Tendring initiatives such as the new Beach Hut Strategy are promoting visits to the coast.

Full text:

I doubt that the new Country Park at Salary Brook and provision of Suitable Accessible Natural Greenspace (SANG) will have significant impact on reducing trips to the Essex coast. The environments are different and individuals need to have a wide range of leisure and recreational activities to maintain optimum physical and mental health. Focus should be on sustainable transport and safe cycling routes to enable visits to local places of interest, e.g. Tenpenny Hill on the B1027. Other Tendring initiatives such as the new Beach Hut Strategy are promoting visits to the coast.

Change suggested by respondent:

Remove the sentence "This will reduce the amount of day-to-day recreational trips to the sensitive Essex coast."

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Appear exam: Written Representation

Attachments: None

150 Object

Document Element: GC POLICY 2: NATURE

Respondent: Mrs Susan Burns [69]

Summary:

The area proposed is already an area that supports an abundance of wildlife. It is impossible to say that by building thousands of houses, roads and associated buildings that bring considerable pollution, by simply building green areas and pathways you are adding to the sustainability of wildlife, sustainability is already here the way nature intended. This area already provides walks, horse riding and cycling facilities to many. Adding thousands of homes, hundreds of cars etc is unsustainable.

Full text:

The area proposed is already an area that supports an abundance of wildlife. It is impossible to say that by building thousands of houses, roads and associated buildings that bring considerable pollution, by simply building green areas and pathways you are adding to the sustainability of wildlife, sustainability is already here the way nature intended. This area already provides walks, horse riding and cycling facilities to many. Adding thousands of homes, hundreds of cars etc is unsustainable.

Change suggested by respondent:

Drastically reduced area of development, larger buffers to existing communities with no access on the already small country lanes.

Legally compliant: No

Sound: No

Comply with duty: No

Appear exam: Written Representation

Attachments: None

160 Object

Document Element: GC POLICY 2: NATURE

Respondent: Mr William Sunnucks [113]

Summary:

It seems unlikely that 10% Biodiversity Net Gain can be achieved on site. We need to see the DEFRA Metric prepared by a credible expert in the evidence base.

Full text:

Policy GC2 – Nature
Biodiversity net gain: it isn't clear how 10% BNG will be achieved on site and I suspect it can't be done.
• The Salary Brook country park will be on the attractive slopes to the Brook which already has high value: so BNG points will be lost when it is open to the public – a key promise in the DPD. There is conflict between the use of Salary Brook as a Nature Reserve and as a Country Park
• Much of the remainder of the site will put farmland and hedgerows under concrete and I would expect a net BNG loss there too.

The evidence base needs a proper BNG assessment using the latest DEFRA metric. If 10% is unachievable then the plan should be changed, or budget included for the purchase of offsite BNG units. It is important that the assumptions in the BNG assessment align with the assumptions in the viability appraisal. Also that 10% BNG is achieved for each phase not as a distant promise.

Change suggested by respondent:

The DEFRA Metric should be prepared and included in the Evidence base
The viability appraisal will need to be changed if offsite mitigation is needed

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Appear exam: Appearance at the examination

Oral exam why: I have a good understanding of the DEFRA BNG metric and the wider economics of the GC which I hope will be helpful to the Inspector.

Attachments: None

174 Object

Document Element: GC POLICY 2: NATURE

Respondent: Ardleigh Parish Council (Ms Rachel Fletcher, Parish Clerk) [143]

Summary:

- We welcome the commitments and intent, but want to see more definition of green corridors, and recognition of the negative impact of the Bellway development on Bromley Road and adjacent to Salary Brook and compensation by extending the Country park by an equivalent space.
- Consideration should be given to local food production.
See attached document (submitted in Land uses and Spatial Approach section)

Full text:

We welcome the commitments and intent, but want to see more definition of green corridors, and recognition of the negative impact of the Bellway development on Bromley Road and adjacent to Salary Brook and compensation by extending the Country park by an equivalent space.

Chapter 4: Nature
Crockleford The DPD also recognises the wider environs and we support extending and protecting the Wildlife corridor along Salary Brook between Churn Wood and Walls Wood as well as a new corridor round the east side of Crockleford, up to the point where the A120 and Bromley Road meet. We would like to see more detail relating to these Green Corridors between the three communities and towards Colchester (Greenstead/ Longridge) and feel that these need to be defined within the DPD documents. At present the plan is too vague, and too much is left to the developer to decide. We welcome the early development of the new Country Park and further steps to protect the area around Salary Brook. We would ask that the equivalent green space, permanently lost by the recent 145 dwellings off Bromley Road (within the original development area), should be compensated for by adding to the green spaces within the Country Park. Also, that further development, along Bromley Road should be firmly resisted. (current appeal for 14 homes with Planning Inspectorate APP/P1560/W/22/3313107)
Serious consideration should be given to local food production for the Garden Community and the land in the area of Crockelford Heath should be retained for this purpose rather than lost to housing. The area has historically grown fruit and vegetables, as well as arable crops. Innovative and sustainable initiatives should be developed for local people to grow produce with low food mileage and with all the associated health benefits.

Change suggested by respondent:

We would ask that the equivalent green space, permanently lost by the recent 145 dwellings off Bromley Road (within the original development area), should be compensated for by adding to the green spaces within the Country Park. Also, that further development, along Bromley Road should be firmly resisted. (current appeal for 14 homes with Planning Inspectorate APP/P1560/W/22/3313107)

Legally compliant: No
Sound: No
Comply with duty: No
Appear exam: Appearance at the examination
Oral exam why: See previous response.
Attachments: None

209 Object

Document Element: GC POLICY 2: NATURE

Respondent: Mr David Ward [134]

Summary:

Please take the opportunity to think totally differently about residential and urban planting.

Full text:

I truly hope this project does not come to fruition, BUT if it does then please consider the opportunity to think totally differently about residential and urban planting. You can walk onto any new development in this country and see the same unimaginative planting schemes, using the same range of plants along with far to much mown grass and a few sparsley planted trees, many of which just slowly die! This is so uninspiring and deemed low maintance, with contracters coming in occasionally to cut the grass. These areas offer fantastic opportunities to provide a food source and habitat for a wide range of wildlife, including butterflies, bumble bees, solitary bees and a multitude of less obvious insects, which in turn provide a food source for creatures higer up the food chain.

I urge those in charge to visit Landswoods Chattowood development the other side of Elmstead to see what is possible. Here, in many areas there are no grass verges, but a fantastic array of insect friendly shrubs and plants, planted in a substrate of sand and gravel (locally sourced). Chosen to survive dry conditions, there is no watering once established, little weeding as the dry, sandy soil discourages weeds (and no noisy, polluting mowing or strimming). A small maintance team manages this planting, so instead of siting on a lawnmower or dressing up in ppc to strim or spray, they actual use and develop their horticultural skills in caring for plants.

Swale ponds are another area in which to introduce a range of plants in order to increase the biodiversity of what are by design a hole in the ground with mown banks, no plants allowed as they would get in the way of the lawnmowing/strimming. A few carefully chosen plants here can transform the wildlife diversity and aesthetics.

I do think the development is flawed on so many levels, as I have commented on elsewhere, but if it does go ahead then what an opportunity to create a true "Garden Village"

Change suggested by respondent:

Consider alternative urban planting where appropriate.

Legally compliant: No

Sound: No

Comply with duty: No

Appear exam: Written Representation

Attachments:

Chattowood one year from planting.jpg - https://tcbgardencommunity.oc2.uk/a/s4

223 Object

Document Element: GC POLICY 2: NATURE

Respondent: Natural England (Ms Tessa Lambert, Lead Adviser- Sustainable Development) [167]

Summary:

Pleased proposed GC Policy 2: Nature specifically requires proposals to accord with NE SANG guidance. However, no information provided in DPD (or supporting documents) on overall size of Garden Community land take, size of likely developable area or amount of land that will be identified as Green Infrastructure. Without this information, NE unable to establish whether SANG guidance can be met site wide and whether the policy requirement is deliverable in practise. Based on 7,500 dwellings, SANG provision would amount to around 145 ha of suitable natural greenspace.

Reference to need for wintering bird surveys (HRA/AA reference 4.8.7) only features in “justification” section of GC Policy 2: Natural and not in wording of this policy or any other policies in DPD. Policy 2 should be made more explicit.

Full text:

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A number of modifications have been made to the DPD since the Regulation 18 consultation and many take into account the representations previously made by Natural England. There are, however, certain issues which require further consideration and clarification. These fall under the general headings of “Green Infrastructure Provision” and “Delivery of mitigation required by Habitats Regulations Assessment/Appropriate Assessment (HRA/AA) in DPD Policy”. Your attention is drawn to our advice on the HRA/AA of the potential effects of the DPD upon air quality at European Sites as this may require a more fundamental review.

Green Infrastructure Provision

Natural England has previously highlighted the need for the Garden Community to deliver sufficient Suitable Alternative Natural Greenspace (SANG) to mitigate the increased recreational pressure that the new housing will give rise to at the European Sites at the Essex Coast. We referenced Natural England's SANG guidance as a suitable tool for assessing the amount and quality of provision and we are pleased that the proposed policy GC Policy 2: Nature specifically requires proposals to accord with this guidance. However, there is no information provided in the DPD (or supporting documents) on the overall size of the Garden Community land take; the size of the
likely developable area; or the amount of land that will be identified as Green Infrastructure (including the different typologies – recreation space; natural greenspace; allotments etc). Without this information it isn't possible for Natural England to establish whether the SANG guidance can be met site-wide, and consequently whether the policy requirement is deliverable in practice. This
is an important consideration given that some reliance is being placed on the contribution to SANG
that can be made by Salary Brook Local Nature Reserve when, as yet, there is no information on the carrying capacity of the Nature Reserve. Based on a planned total of 7,500 dwellings, the SANG provision would amount to around 145 hectares of suitable, natural greenspace.

Delivery of mitigation required by HRA/AA in DPD Policy

1. Functionally Linked Land
The potential for the loss of functionally linked land (i.e. land which supports mobile species that are qualifying features of a European Sites) is identified as an issue to be progressed to Appropriate Assessment (AA) in the HRA that accompanies the DPD (undertaken by Essex Place
Services, dated May 2023). The European Sites of specific interest are the Colne Estuary
SPA/Ramsar and the Stour and Orwell Estuaries SPA/Ramsar.

As mitigation for such likely significant effects the HRA/AA states at 4.8.7:

"Each phase of development must be supported by up-to-date over-wintering bird surveys to determine the usage of the phases by individual waterbirds and the importance of their assemblages. If any over-wintering bird surveys at application stage identifies that the proposals will result in impacts upon the individual waterbirds or the waterbird assemblage associated within the Colne Estuary SPA and Ramsar site or the Stour and Orwell Estuaries SPA and Ramsar site,
then bespoke mitigation measures must be secured either by legal agreement or a condition of any consent with landowners located in Tendring District Council and Colchester City Council within
close proximity of the relevant Habitats sites."

The reference to the need for wintering bird surveys only features in the "Justification" section for GC Policy 2: Nature and does not appear in the wording of this Policy or any other policies in the DPD. The wording of Policy 2 states that "proposals must be supported with appropriate ecological surveys" but this should be made more explicit to ensure that i) the Local Planning Authority can require that wintering bird surveys are undertaken ahead of the submission of relevant planning applications and ii) prospective developers are clear about the need for such surveys. Without explicit reference in the wording of the Policy there is scope for different interpretations at the application validation stage and there would remain some doubt as to a conclusion of No Adverse Effects on Integrity through HRA/AA of the Submission DPD.

2. Air quality impacts
The potential for the development of the Garden Community to have impacts upon air quality at certain European Sites is also identified as an issue to be progressed to AA. Assessment is
required due to the potential for the development (alone and in combination) to result in increases
in traffic levels on routes that lie within 200m of European Sites whose qualifying features, or the habitats that support them, are sensitive to any related changes in air quality.

The HRA/AA is specific about the need for traffic modelling to be undertaken to assess whether any mitigation for traffic-related impacts will be necessary. At 4.9.12 it states:

"Each relevant phase of development for the garden community should be supported by traffic scoping modelling to fully determine whether further mitigation measures to avoid adverse impacts from air quality are required…"

The HRA/AA goes on to outline the methodology that should be used for the modelling and identifies the trigger points for further air quality monitoring. A key traffic route to be considered in this context is the A137 which passes alongside the Stour and Orwell SPA/Ramsar. According to the HRA/AA, this route is expected to see an increase in annual average daily traffic (AADT), due to the Garden Community development, which exceeds the recognised trigger for potential likely significant effects (over 1,000 AADT increase).

In view of this anticipated increase, it would be reasonable for the AA to consider in more detail the specific circumstances at the relevant European Site to establish whether mitigation is required as a consequence of the proposed development (alone or in combination) because it doesn't necessarily follow that a more than 1000 AADT will result in an adverse effect on site integrity.

The AA could consider (through site survey and APIS sourced information) the presence/absence of air quality (Nitrogen) sensitive habitat that exists within 200m of the relevant route; and if such habitats are present, the extent to which the qualifying features of the SPA are supported by such habitats. APIS-based information on trends in background pollution could also be examined to provide context. Some of this analysis appears to have been undertaken in the Screening section of the HRA/AA but the focus shifts in the AA to traffic scoping modelling and the results of traffic modelling (once compared with the air quality monitoring recently undertaken in connection with the Babergh, Mid Suffolk Joint Local Plan) is identified as the basis for assessing whether mitigation is required.
It is unfortunate that the air quality monitoring information is not yet available, nor is there any traffic modelling information available which would offer a more solid basis for ruling in/out individual European Sites at HRA screening stage. As a result, the mitigation that is identified
(4.9.12 and 4.9.13) does not provide mitigation per se; rather it requires traffic scoping modelling to establish whether there is the need for air quality monitoring which, in turn, may indicate that
mitigation is required. In any event, the requirement for traffic scoping modelling to be undertaken
ahead of each phase of the development does not appear in the text of any of the proposed
Policies in the DPD. If traffic modelling is being identified as the tool to be used to establish
whether mitigation will be required to avoid adverse effects on the integrity of European Site(s), the requirement for the modelling to be undertaken ahead of each phase of development needs to be
clearly set out in DPD policy.

In conclusion, Natural England advises that the screening for air quality impacts should be revisited once there is traffic modelling information available to confirm which European Sites merit consideration (due to exceedance of relevant AADT triggers) when the DPD is considered “alone” and “in combination”. Once that filter has been applied, consideration would shift to the Site-
specific circumstances as outlined above. Only at this stage will it become apparent whether mitigation is likely to be required and, if required, the mitigation options available can then be identified, tested and embedded in DPD Policy.

It is also worth noting that the APIS data has been recently updated and now provides a more fine- grained (1Km grid square) position on deposited Nitrogen at protected sites.

I trust that the above comments are helpful. I would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact me at Tessa.lambert@naturalengland.org.uk

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments:

224 Object

Document Element: GC POLICY 2: NATURE
Respondent: Natural England (Ms Tessa Lambert, Lead Adviser- Sustainable Development) [167]

Summary:

The HRA/AA is specific about the need for traffic modelling to be undertaken to assess whether any mitigation for traffic-related impacts will be necessary (4.9.12).

It would be reasonable for the AA to consider in more detail the specific circumstances at the relevant European Site to establish whether mitigation is required as a consequence of the proposed development (alone or in combination)

It is unfortunate that the air quality monitoring information and traffic modelling are not yet available. The mitigation identified does not provide mitigation per se.

NE advise that screening for air quality impacts should be revisited once there is traffic modelling information available to confirm which European Sites merit consideration when the DPD is considered alone and in combination.

Full text:

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A number of modifications have been made to the DPD since the Regulation 18 consultation and many take into account the representations previously made by Natural England. There are, however, certain issues which require further consideration and clarification. These fall under the general headings of “Green Infrastructure Provision” and “Delivery of mitigation required by Habitats Regulations Assessment/Appropriate Assessment (HRA/AA) in DPD Policy”. Your attention is drawn to our advice on the HRA/AA of the potential effects of the DPD upon air quality at European Sites as

this may require a more fundamental review.

Green Infrastructure Provision

Natural England has previously highlighted the need for the Garden Community to deliver sufficient Suitable Alternative Natural Greenspace (SANG) to mitigate the increased recreational pressure that the new housing will give rise to at the European Sites at the Essex Coast. We referenced Natural England's SANG guidance as a suitable tool for assessing the amount and quality of provision and we are pleased that the proposed policy GC Policy 2: Nature specifically requires proposals to accord with this guidance. However, there is no information provided in the DPD (or supporting documents) on the overall size of the Garden Community land take; the size of the
likely developable area; or the amount of land that will be identified as Green Infrastructure (including the different typologies – recreation space; natural greenspace; allotments etc). Without this information it isn't possible for Natural England to establish whether the SANG guidance can be met site-wide, and consequently whether the policy requirement is deliverable in practice. This
is an important consideration given that some reliance is being placed on the contribution to SANG
that can be made by Salary Brook Local Nature Reserve when, as yet, there is no information on the carrying capacity of the Nature Reserve. Based on a planned total of 7,500 dwellings, the SANG provision would amount to around 145 hectares of suitable, natural greenspace.

Delivery of mitigation required by HRA/AA in DPD Policy

1. Functionally Linked Land
The potential for the loss of functionally linked land (i.e. land which supports mobile species that are qualifying features of a European Sites) is identified as an issue to be progressed to Appropriate Assessment (AA) in the HRA that accompanies the DPD (undertaken by Essex Place
Services, dated May 2023). The European Sites of specific interest are the Colne Estuary
SPA/Ramsar and the Stour and Orwell Estuaries SPA/Ramsar.

As mitigation for such likely significant effects the HRA/AA states at 4.8.7:

"Each phase of development must be supported by up-to-date over-wintering bird surveys to determine the usage of the phases by individual waterbirds and the importance of their assemblages. If any over-wintering bird surveys at application stage identifies that the proposals will result in impacts upon the individual waterbirds or the waterbird assemblage associated within the Colne Estuary SPA and Ramsar site or the Stour and Orwell Estuaries SPA and Ramsar site,
then bespoke mitigation measures must be secured either by legal agreement or a condition of any consent with landowners located in Tendring District Council and Colchester City Council within
close proximity of the relevant Habitats sites."

The reference to the need for wintering bird surveys only features in the "Justification" section for GC Policy 2: Nature and does not appear in the wording of this Policy or any other policies in the DPD. The wording of Policy 2 states that "proposals must be supported with appropriate ecological surveys" but this should be made more explicit to ensure that i) the Local Planning Authority can require that wintering bird surveys are undertaken ahead of the submission of relevant planning applications and ii) prospective developers are clear about the need for such surveys. Without explicit reference in the wording of the Policy there is scope for different interpretations at the application validation stage and there would remain some doubt as to a conclusion of No Adverse Effects on Integrity through HRA/AA of the Submission DPD.

2. Air quality impacts
The potential for the development of the Garden Community to have impacts upon air quality at certain European Sites is also identified as an issue to be progressed to AA. Assessment is
required due to the potential for the development (alone and in combination) to result in increases
in traffic levels on routes that lie within 200m of European Sites whose qualifying features, or the habitats that support them, are sensitive to any related changes in air quality.

The HRA/AA is specific about the need for traffic modelling to be undertaken to assess whether any mitigation for traffic-related impacts will be necessary. At 4.9.12 it states:

"Each relevant phase of development for the garden community should be supported by traffic scoping modelling to fully determine whether further mitigation measures to avoid adverse impacts from air quality are required…"

The HRA/AA goes on to outline the methodology that should be used for the modelling and identifies the trigger points for further air quality monitoring. A key traffic route to be considered in this context is the A137 which passes alongside the Stour and Orwell SPA/Ramsar. According to the HRA/AA, this route is expected to see an increase in annual average daily traffic (AADT), due to the Garden Community development, which exceeds the recognised trigger for potential likely significant effects (over 1,000 AADT increase).

In view of this anticipated increase, it would be reasonable for the AA to consider in more detail the specific circumstances at the relevant European Site to establish whether mitigation is required as a consequence of the

proposed development (alone or in combination) because it doesn't necessarily follow that a more than 1000 AADT will result in an adverse effect on site integrity.

The AA could consider (through site survey and APIS sourced information) the presence/absence of air quality (Nitrogen) sensitive habitat that exists within 200m of the relevant route; and if such habitats are present, the extent to which the qualifying features of the SPA are supported by such habitats. APIS-based information on trends in background pollution could also be examined to provide context. Some of this analysis appears to have been undertaken in the Screening section of the HRA/AA but the focus shifts in the AA to traffic scoping modelling and the results of traffic modelling (once compared with the air quality monitoring recently undertaken in connection with the Babergh, Mid Suffolk Joint Local Plan) is identified as the basis for assessing whether mitigation is required.
It is unfortunate that the air quality monitoring information is not yet available, nor is there any traffic modelling information available which would offer a more solid basis for ruling in/out individual European Sites at HRA screening stage. As a result, the mitigation that is identified
(4.9.12 and 4.9.13) does not provide mitigation per se; rather it requires traffic scoping modelling to establish whether there is the need for air quality monitoring which, in turn, may indicate that
mitigation is required. In any event, the requirement for traffic scoping modelling to be undertaken
ahead of each phase of the development does not appear in the text of any of the proposed
Policies in the DPD. If traffic modelling is being identified as the tool to be used to establish
whether mitigation will be required to avoid adverse effects on the integrity of European Site(s), the requirement for the modelling to be undertaken ahead of each phase of development needs to be
clearly set out in DPD policy.

In conclusion, Natural England advises that the screening for air quality impacts should be revisited once there is traffic modelling information available to confirm which European Sites merit consideration (due to exceedance of relevant AADT triggers) when the DPD is considered "alone" and "in combination". Once that filter has been applied, consideration would shift to the Site-
specific circumstances as outlined above. Only at this stage will it become apparent whether mitigation is likely to be required and, if required, the mitigation options available can then be identified, tested and embedded in DPD Policy.

It is also worth noting that the APIS data has been recently updated and now provides a more fine- grained (1Km grid square) position on deposited Nitrogen at protected sites.

I trust that the above comments are helpful. I would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact me at Tessa.lambert@naturalengland.org.uk

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments:

227 Object

Document Element: GC POLICY 2: NATURE
Respondent: Latimer (Tendring Colchester Borders Garden Community) Developments Limited [127]
Agent: Lichfields (Miss Charlotte Walker, Planner) [124]

Summary:

Latimer is supportive of the GC Policy 2 approach to 'Nature' overall and is aligned to the vision that the outdoor and natural environment of the Garden Community will be its biggest asset. To achieve this, some amendments are proposed in this section to ensure a future masterplan, informed by the DPD can deliver all the required ambitions and supporting infrastructure.

Full text:

See attachment

Change suggested by respondent:

Clarity in GC Policy 2 'Nature' regarding which Green Infrastructure features the Council would and would not accept as contributing to Biodiversity Net Gain ('BNG') and how 'stacking' could be demonstrated.
Amendments suggested to Part D and supporting policy justification.

Legally compliant: Not specified
Sound: No
Comply with duty: Not specified
Appear exam: Appearance at the examination
Oral exam why: Developer
Attachments:

Latimer Reps - https://tcbgardencommunity.oc2.uk/a/sp

236 Object

Document Element: GC POLICY 2: NATURE
Respondent: Wivenhoe Town Council (Mrs Joanne Beighton-Emms, Town Clerk) [96]

Summary:

Ecology audit bases on desktop surveys and has limitations.
BNG metric fundamentlly flawed.
Restricted access to land for consulting ecologists.
BNG metric measures habit loss as messaure of what is to be replaced. Does not consider way habitat may be degrated or materially changed as a result of development.
Part B – will not prevent additional trips to the coast
Part E – no buffer to East of country park where screening and noise mtigation is more relevant
Part F – No suggestion these facilites go in ether Elmstead or Wivenhoe green buffer.

Full text:

See attached letter for full text

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: No
Comply with duty: Not specified
Appear exam: Appearance at the examination
Oral exam why: WTC councillors request that they can make representations at the Hearing.
Attachments:

Wivenhoe Town Council - https://tcbgardencommunity.oc2.uk/a/sg

269 Object

Document Element: GC POLICY 2: NATURE
Respondent: Dr Chris Gibson [177]

Summary:

There is no certainty that the proposed mitigation measures will be successful in sufficiently reducing impacts on Habitats Regulations sites. The appropriate legal test is that the competent authority must be able to ASCERTAIN that the plan, with mitigation, will not have adverse effects upon the Habitats Regulations site.

Full text:

Dear Sirs

Tendring/Colchester Garden Community Regulation 19 Consultation

Further to your email consultation dated 12/05/2023, please find below my comments to the question of whether the Plan is Legally Compliant, Sound and Complies with the Duty to co-operate.
My legitimacy for comment is provided by the fact that:
a. I am a resident of the Wivenhoe waterfront (and already suffering from high levels of antisocial behaviour especially from motorised water-users).
b. I am a naturalist and ecologist of some local renown, and have observed on many occasions the adverse effects of recreational pressures (even in the absence of this very significant local development) upon the wildlife features of importance of the Colne Estuary. The estuary and its wildlife benefits from the very highest levels of recognition and protection under national and international law (designated as SSSI, SPA, SAC and Ramsar Site), and indeed has very recently been proposed for inclusion in the East Atlantic Waterbird Flyway World Heritage Site.
c. And by virtue of my career in statutory nature conservation, working exclusively for Natural England and its predecessor bodies, until I took early retirement some 7 years ago, I have a very long (some might say unparalleled) history in using, interpreting, implementing and developing guidance on the most important suite of legislative provision for such situations, the Habitats Regulations.
My comments here relate specifically to the question of legal compliance and soundness. My submissions to previous stages of the plan explain many of these points in fuller detail, and also refer to my additional contention that, for example, the required Strategic EIA standards were not adhered to, with the failure to explore all options at the wider strategic context, referring only to sites that were 'offered' as part of a call for sites ('opportunity driving strategy' rather than 'strategy determining opportunity'). I remain firmly of the view that this misstep at the earliest stage represents a potentially fatal flaw in the whole scheme.
In respect of the specifics of the present consultantation, it is my contention that, on the basis of law and legal precedent, it is clear that the Plan is NOT Legally Compliant. And on the basis of this lack of compliance, the Plan must therefore be found unsound. Below is my justification for this position.
1. It is a matter of common ground that being so close (only some 3km at the nearest point) to the designated site, the vulnerability and sensitivity of the site to additional recreational pressures means that the Plan would have a Likely Significant Effect and that it cannot be concluded that it can be ascertained that it will not have an Adverse Effect Upon the Integrity of the Habitats Regulations site (note that the emboldened phrases refer specifically to the tests of soundness, acceptability and sustainability embodied within the legislation).
2. That being the case, the plan can proceed only if mitigation measures are provided that will with certainty remove the adverse effects of the plan in perpetuity.
3. The only other exception is if the plan is deemed to be of national significance. No determination has been made to that effect, and indeed it has never been put forward as a Nationally Significant Infrastructural Project, the clear implication being that this route for delivering the legal approval for the plan cannot be pursued further.
4. The mitigation measures proposed to remove the Adverse Effects on Integrity concentrate on two approaches, of:
a. The creation of interceptive or diversionary green infrastructure in order to divert and absorb the additional recreational pressures away from the Habitats Regulations Site. While this may have some success (with for example dog walking, biking etc), equally clearly the 'lure of the coastal path' will render the provision of generic greenspace partially ineffective, and then there are also those activities (eg jet skiing) than could only be carried out on the estuary.
b. Setting up a Recreational Access Management Scheme on and around the Habitats Regulations site (involving some wardening and information provision, and monitoring) to inform and encourage sustainable use. I would contend that such a scheme is ALREADY necessary (practically and legally) to try to prevent the deterioration of the site under the current levels of recreational use.
5. However, to allow the plan to proceed, the deployment of a RAMS approach must benefit from a requisite degree of certainty that it will reduce impacts to a level whereby they no longer represent an Adverse Effect on Integrity, and that there is a guarantee that such measures would be delivered in perpetuity, long after developers' contributions have been exhausted, and immune to the vagaries of politics on public finances (this of course can never be known, and therefore such an insecure approach cannot be relied upon to implement a legal requirement).
6. In respect of certainty that a RAMS approach will work, it would be useful if there were any definitive evidence that it does. Such schemes (with monitoring) have been operation now for up to 15 years in parts of the country (indeed, I was involved in setting some of them up) and yet there is still no published evidence that such schemes have actually offset the harm caused by human factors impacting a site. The burden of proof required for an authority to 'ascertain' that a plan will not have an adverse effect upon a Habitats Regulations site: case law and precedent have concluded that the degree of certainty is close to that required in criminal cases ('beyond reasonable doubt') rather than the normal test in civil cases ('on the balance of probabilities').
7. In other words, the legal requirements are such that it is wholly insufficient to determine that a mitigation scheme 'might', or even 'should' be successful. It must be possible to demonstrate that it 'will' be successful, otherwise the risk to the Habitats Regulations site is such that the development, as a matter of law cannot be allowed to proceed. The Precautionary Principle is paramount.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: Not specified
Appear exam: Not specified
Attachments:
Representation - https://tcbgardencommunity.oc2.uk/a/t5

270 Object

Document Element: GC POLICY 2: NATURE
Respondent: Elmstead Parish Council (Mrs Angela Baxter, Parish Clerk) [145]

Summary:

Introduction
- Garden community site isn't natural, it's intensely farmed. Truly natural areas are very few.
- New homes will not contribute to nature recovery.
- Policy is unrealistically optimistic and will be ineffective in practice.
- Natural preservation and effective development are in direct contrast to each other.
- Only viable form of carbon capture for the GC is vegetation, and the site already does this without development. Any meaningful carbon capture would rely on yet to be invented technology.
- Concerned about misleading discrepancies between illustrative plans and policies map.
Policy intro
- Elmstead church will be harmed by proposals.
Part A
- Using Salary Brook as a SANG will harm the native habitat here.
Part B
- Development will take away natural and historic environment, not celebrate it.
Part C
- Policy wording is not robust enough.
- Information for new residents isn't enough to protect sensitive sites.
Part D
- Delivering BNG on site too resource intensive.
Part E
- Farming landscape isn't conducive to planning a settlement.
- Language isn't precise enough.
Part F
- Policy is commendable but insufficient evidence is presented to support using so much land without compromising other land uses.
- Allotments are not acceptable within green gaps.
Part G
- Disagree with evidence base around groundwater conditions and the suitability of SuDS.
Part H
- Link road mitigation needs more certainty.
Part I
- 30-year commitment for BNG isn't long enough for such a long term scheme.
Justification
- Concerned about public being excluded from natural spaces to protect biodiversity.

Full text:

See full representation attached.

Change suggested by respondent:

Part A
- Alternative approach to SANG required that won't harm Salary Brook

Part B
- Remove reference to celebrating?

Part C
- More robust language is needed to be effective in retaining habitats
- A scheme to buffer established woodland is needed (particularly Churn, Thousand Acre, and Home Woods.
- A strategy to limit access to the public to the most sensitive sites should be included.

Part D
- BNG should be secured off-site to ensure efficient use of resources.
- Turnip Lodge Lane should be offered greater protection.

Part E
- The policy should be more precise with regards to which hedgerows and trees should be retained, and those should be given additional protection and buffer zones.
- Strategic policy is needed to instate tree belt planting before development begins, and to maintain and reinforce the landscape.

Part F
-

Part G
-

Part H
- A detailed comprehensive approach to mitigation around the northern part of the Link Road is needed.

Part I
- A further commitment is needed to ensure custodianship of BNG responsibilities indefinitely.
- Further work needed to understand the extent of drainage requirements for the site, to ensure it is viable.

Legally compliant: Yes

Sound: No

Comply with duty: No

Appear exam: Appearance at the examination

Oral exam why: As the Parish Council representing the most affected land area and community we have a number of concerns that haven't been adequately addressed and we should be able to represent the Parish community at the hearing.

Attachments:

EPC Representation - https://tcbgardencommunity.oc2.uk/a/t9