GC POLICY 2: NATURE

RE2

Support

Summary of representations:

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.

Summary of representation changes to plan:

None

Response:

Support Noted

Action:

None

2

Respondent: Mr Kieran Franklin [22]

Change suggested by respondent:

-

Attachments: None

Support

Summary of representations:

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

Summary of representation changes to plan:

None

Response:

Support Noted

Action:

Statement of Common Ground prepared between Sport England and the Councils.

67

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

Change suggested by respondent:

-

Attachments: None

Support

Summary of representations:

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.

Summary of representation changes to plan:

None

Response:

Support Noted

Action:

Statement of Common Ground prepared between Affinity Water and the Councils.

98

Respondent: Affinity Water (Mrs Hannah Wilson, Environmental Planner) [108]

Change suggested by respondent:

-

Attachments: None

Support

Summary of representations:

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.

Summary of representation changes to plan:

None

Response:

Support Noted

Action:

None

105

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

Change suggested by respondent:

-

Attachments: None

Support

Summary of representations:

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”.

Summary of representation changes to plan:

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.

Response:

Support and change to plan request noted. The policy is considered sound, however, upon further assessment the Councils consider that a proposed change to the DPD could be appropriate.

Action:

Modification suggested in Schedule of Modifications.

106

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

Change suggested by respondent:

-

Attachments: None

Support

Summary of representations:

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.

Summary of representation changes to plan:

None

Response:

Support Noted

Action:

Statement of Common Ground prepared between Anglian Water and the Councils.

122

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

Change suggested by respondent:

-

Attachments: None

Support

Summary of representations:

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.

Summary of representation changes to plan:

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.”

Response:

Support and change to plan request noted. The policy is considered sound, however, upon further assessment the Councils consider that a proposed change to the DPD could be appropriate.

Action:

Modification suggested in Schedule of Modifications.

107

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

Change suggested by respondent:

-

Attachments: None

Object

Summary of representations:

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.

Summary of representation changes to plan:

GC Policy 2, Part D:
Suggested modification to wording "Habitat enhancement and creation for delivering biodiversity net gain within the Strategic Green Gaps, Salary Brook Country Park, SANG and SuDS and other green infrastructure will be supported by the Council. Stacking of ecosystem services will be permitted where additionality can be demonstrated, taking account of emerging guidance on stacking from Natural England and Defra".
Removal of: "As such the ambition is to achieve a BNG of 15% on average across the whole masterplan."

See SoCG for further details.

Response:

Comments noted. The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base. However, upon further assessment the Councils consider that a proposed change to the DPD could be appropriate with regard to GC Policy 2, Part D relating to BNG.

The Councils agree that the suggested modification to refer to the 'ambition' to achieve 15%, could be removed without detriment to the overall policy aim to deliver a minimum of 10%, along with further wording to provide addition clarity.

Removal of wording relating to provision of around 50% open space is not considered appropriate as the reference is not a policy requirement and is referencing principles only in the appendix of the DPD. No change is necessary as it does not affect any policies or the soundness of the DPD.

Action:

Statement of Common Ground is being prepared between the Councils and Latimer. Modification suggested to wording of GC Policy 2, Part D.

227

Respondent: Latimer (Tendring Colchester Borders Garden Community) Developments Limited [127]
Agent: Lichfields

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.

Attachments:

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

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

The principle of development was established in the Section 1 Local Plan. As set out in Policy 2 there will be a minimum Biodiversity Net Gain of 10% with an aspiration to achieve 15% across the site. The policy contains provision for protection and enhancement of existing green infrastructure. It also provides for the creation of new green infrastructure on site as well as improving connectivity with neighbouring areas.

Action:

None.

9

Respondent: Mr Gary Plummer [23]

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.

Attachments: None

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

The principle of development was established in the Section 1 Local Plan. As set out in Policy 2 there will be a minimum Biodiversity Net Gain of 10% with an aspiration to achieve 15% across the site. The policy contains provision for protection and enhancement of existing green infrastructure. It also provides for the creation of new green infrastructure on site as well as improving connectivity with neighbouring areas.

Action:

None.

20

Respondent: Kathryn and Timothy Pugh [50]

Change suggested by respondent:

-

Attachments:

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

The principle of development was established in the Section 1 Local Plan. As set out in Policy 2 there will be a minimum Biodiversity Net Gain of 10% with an aspiration to achieve 15% across the site. The policy, in accordance with the Local Nature Recovery Strategy, sets out to maximise opportunities for protection, restoration, enhancement and connection of natural habitats both within the Garden Community and neighbouring areas.

Action:

None.

29

Respondent: Miss Louise terry [30]

Change suggested by respondent:

-

Attachments: None

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

The principle of development was established in the Section 1 Local Plan. As set out in Policy 2 there will be a minimum Biodiversity Net Gain of 10% with an aspiration to achieve 15% across the site.
Policy GC 2 part H deals specifically with the environmental mitigation requirements for the link road.
Policy GC1 makes provision for the Elmstead Strategic Green Gap to serve as a buffer and prevent coalescence.

Action:

None.

30

Respondent: Gemma Robinson [54]

Change suggested by respondent:

-

Attachments: None

Object

Summary of representations:

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

Summary of representation changes to plan:

None.

Response:

The principle of development was established in the Section 1 Local Plan. As set out in Policy 2 there will be a minimum Biodiversity Net Gain of 10% with an aspiration to achieve 15% across the site.
Policy GC 4 stipulates that at least 30% of all new homes must be provided as 'affordable housing'.

Action:

None.

35

Respondent: James Chable [55]

Change suggested by respondent:

-

Attachments: None

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

Policy GC 2 sets out provision for allotments, orchards, edible walkways and community gardens to ensure that the landscape remains productive. The special character of Crockleford Heath had been recognised in Policy GC1 to ensure that proposals preserve or enhance the intrinsic character of the area.

Action:

None.

41

Respondent: Mrs Carolyn Mason [64]

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.

Attachments: None

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

Policy GC1 makes provision for the Elmstead Strategic Green Gap to serve as a buffer and prevent coalescence.

Action:

None.

47

Respondent: Ria Lockwood [71]

Change suggested by respondent:

-

Attachments: None

Object

Summary of representations:

•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.

Summary of representation changes to plan:

None.

Response:

The principle of development was established in the Section 1 Local Plan. As set out in Policy 2 there will be a minimum Biodiversity Net Gain of 10% with an aspiration to achieve 15% across the site.
Policy GC 6 outlines that provision needs to be made for appropriate stewardship, financing and governance of community assets.

Action:

None.

86

Respondent: Mr David Mead [27]

Change suggested by respondent:

-

Attachments: None

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

Policy GC1 makes provision for the Elmstead Strategic Green Gap to serve as a buffer and prevent coalescence.

Action:

None.

111

Respondent: Mr Shaun Raven [37]

Change suggested by respondent:

-

Attachments:

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

Policy GC 2 sets out to protect and enhance existing green - blue infrastructure, ancient woodland being a key contributor. The Policy acknowledges the need for tree belt planting around existing woodland. Continued engagement with the Woodland Trust would be welcomed to inform future planning considerations.

Action:

None.

120

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

Change suggested by respondent:

-

Attachments:

Woodland Trust - https://tcbgardencommunity.oc2.uk/a/9

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

Policy GC 2 identifies SANGs and Bird Aware Essex. SANGs is the Natural England identified means to mitigate increased recreational pressure that new house building will place on ecologically sensitive coastal sites. The development will also contribute to Bird Aware scheme (formerly RAMs) which is specifically aimed at mitigating these additional visitor pressures via a variety of schemes along the Essex coastline.

Action:

None.

132

Respondent: Mrs Sarah Chandler [93]

Change suggested by respondent:

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

Attachments: None

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

The principle of development was established in the Section 1 Local Plan. As set out in Policy 2 there will be a minimum Biodiversity Net Gain of 10% with an aspiration to achieve 15% across the site. The policy contains provision for protection and enhancement of existing green infrastructure. It also provides for the creation of new green infrastructure on site as well as improving connectivity with neighbouring areas.

Action:

None.

150

Respondent: Mrs Susan Burns [69]

Change suggested by respondent:

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

Attachments: None

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

Comment noted. The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including the Strategic Masterplan and Environmental Audit work done by Gillespies, which has set out a number of opportunities to enhance values.

As set out in Policy 2 there will be a minimum Biodiversity Net Gain of 10% with an aspiration to achieve 15% across the site.

A BNG metric will be submitted with the planning application, as a legislative requirement, the biodiversity net gain is then conditioned. A biodiversity gain plan will be required by the LPA that illustrates how the 10% is to be achieved either on site or by purchasing off-site credits.

The Councils consider that appropriate allowances related to the land required to achieve the biodiversity net gain policy requirements have been included within the viability work. The 'Financial Viability Assessment Update' has assessed the benchmark land value of the whole land area related to the garden community in line with work set out in the 'Strategic Masterplan', which has incorporated consideration of existing biodiversity and ecological assets and areas where enhancements could be appropriate. Overall a total land take of circa 420 hectares (1,000 acres) has been considered. This contains all of the land use requirements of the garden community, and includes considerable allowances to incorporate existing areas of ecological and biodiversity value, areas where such value can be enhanced and the introduction of new open spaces which will provide opportunities to further enhance values. The Strategic Masterplan work published in the evidence base shows where and how areas of open spaces can promote and contain enhanced biodiversity and ecological values.

Given the capacity of the land area to accommodate biodiversity net gain, the Councils do not consider that additional land offsite for mitigation would be necessary or appropriate at this stage and therefore no change is needed to the viability work. The policy sets out that offsite provision would only be considered as a last resort, and this would be a matter for applicants to consider as part of the preparation of future planning application/s, where they would need to propose and justify any such approach.

Action:

None.

160

Respondent: Mr William Sunnucks [113]

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

Attachments: None

Object

Summary of representations:

- 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)

Summary of representation changes to plan:

None.

Response:

The policy contains provision for protection and enhancement of existing green infrastructure. It also provides for the creation of new green infrastructure on site as well as improving connectivity with neighbouring areas. Policy GC 2 sets out provision for allotments, orchards, edible walkways and community gardens to ensure that the landscape remains productive. The special character of Crockleford Heath had been recognised in Policy GC1 to ensure that proposals preserve or enhance the intrinsic character of the area. The recent Bromley Road development sits outside of the remit of the Garden Community and the examination of the DPD.

Action:

None.

174

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

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)

Attachments: None

Object

Summary of representations:

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

Summary of representation changes to plan:

None.

Response:

The policy contains provision for protection and enhancement of existing green infrastructure. It also provides for the creation of new green infrastructure on site as well as improving connectivity with neighbouring areas. Policy GC 2 sets out to protect and enhance existing green-blue infrastructure through a variety of different designs where appropriate. The policy, in accordance with the Local Nature Recovery Strategy, sets out to maximise opportunities for protection, restoration, enhancement and connection of natural habitats both within the Garden Community and neighbouring areas. Policy GC 2 sets out provision for allotments, orchards, edible walkways and community gardens to ensure that the landscape remains productive.

Action:

None.

209

Respondent: Mr David Ward [134]

Change suggested by respondent:

Consider alternative urban planting where appropriate.

Attachments:

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

Object

Summary of representations:

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.

Summary of representation changes to plan:

Please refer to the Statement of Common Ground.

Response:

Please refer to the Statement of Common Ground.

Action:

Please refer to the Statement of Common Ground.

223

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

Change suggested by respondent:

-

Attachments:

Object

Summary of representations:

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.

Summary of representation changes to plan:

Please refer to the Statement of Common Ground.

Response:

Please refer to the Statement of Common Ground.

Action:

Please refer to the Statement of Common Ground.

224

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

Change suggested by respondent:

-

Attachments:

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

The ecological surveys undertaken were appropriate for the level of detail required at this stage of plan making. The BNG metric is now a legislative requirement. Policy GC 2 sets out provision for allotments, orchards, edible walkways and community gardens to ensure that the landscape remains productive, the locations of these will come forward at application stage. Policy GC 2 identifies SANGs and Bird Aware Essex. SANGs is the Natural England identified means to mitigate increased recreational pressure that new house building will place on ecologically sensitive coastal sites. The development will also contribute to Bird Aware scheme (formerly RAMs) which is specifically aimed at mitigating these additional visitor pressures via a variety of schemes along the Essex coastline.

Action:

None.

236

Respondent: Wivenhoe Town Council (Mrs Joanne Beighton-Emms, Town Clerk) [96]

Change suggested by respondent:

-

Attachments:

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

Object

Summary of representations:

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.

Summary of representation changes to plan:

The Councils are working with Natural England to prepare a response that directly addresses the concerns raised.

Response:

We thank Dr Gibson for his comments. The Councils are working with Natural England to prepare a response that directly addresses the concerns raised.

Action:

The Councils are working with Natural England to prepare a response that directly addresses the concerns raised.

269

Respondent: Dr Chris Gibson [177]

Change suggested by respondent:

-

Attachments:

Representation - https://tcbgardencommunity.oc2.uk/a/t5

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

The principle of development was established in the Section 1 Local Plan. As set out in Policy 2 there will be a minimum Biodiversity Net Gain of 10% with an aspiration to achieve 15% across the site. A BNG metric will be submitted with the planning application, as a legislative requirement, the biodiversity net gain is then conditioned. A biodiversity gain plan will be required by the LA that illustrates how the 10% is to be achieved either on site or by purchasing off-site credits.
The policy contains provision for protection and enhancement of existing green infrastructure. It also provides for the creation of new green infrastructure on site as well as improving connectivity with neighbouring areas.
The policy, in accordance with the Local Nature Recovery Strategy, sets out to maximise opportunities for protection, restoration, enhancement and connection of natural habitats both within the Garden Community and neighbouring areas.
Policy GC 2 sets out provision for allotments, orchards, edible walkways and community gardens to ensure that the landscape remains productive, the locations of these will come forward at application stage.
Policy GC 2 sets out to protect and enhance existing green - blue infrastructure, ancient woodland being a key contributor.
Policy GC 2 part H deals specifically with the environmental mitigation requirements for the link road.

Action:

None.

270

Respondent: Elmstead Parish Council (Mrs Angela Baxter, Parish Clerk) [145]

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
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Part G
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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.

Attachments:

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