3 Support

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

Respondent: Mr Kieran Franklin [22]

Summary:

I note that a minimum of 30% affordable housing is to be provided, but what proportion of social housing will be provided? A significant number of council/housing association homes must be included in this scheme, interspersed across the whole site to ensure the whole development is socially integrated.
Student accommodation should confined to the southern part of the site, with strict planning policies in place to prevent large numbers of family homes in the garden community being converted to student homes later, as has happened in Greenstead and other parts of East Colchester in recent years.

Full text:

I note that a minimum of 30% affordable housing is to be provided, but what proportion of social housing will be provided? A significant number of council/housing association homes must be included in this scheme, interspersed across the whole site to ensure the whole development is socially integrated.
Student accommodation should confined to the southern part of the site, with strict planning policies in place to prevent large numbers of family homes in the garden community being converted to student homes later, as has happened in Greenstead and other parts of East Colchester in recent years.

Change suggested by respondent:

-

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

16 Support

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

Respondent: Mr Bryan Thomas [38]

Summary:

- There must be inspirational design to create a community.
- New homes must be exciting and stimulating places to live in and should incorporate peoples' own lifestyles.
- A building development is incomplete until it has a planted and thriving landscape.

Full text:

The Tendring Colchester Garden Communities Project
I must apologise for being late with this and for it being an email, but my days of attending Committees and such are long gone. I am hoping, however, that a few thoughts might creep through the bureaucratic and over-long discussion times we live in.
• I am very much in favour of the new road linking the area to the A133 as a matter of urgency, not being pushed into the background. This could be such a boon to locals around here. The fact that it would clear jams on Clingoe Hill and divert traffic from the Colchester circuits for those going South or North suggest that Essex Highways and Colchester Borough should be funding it rather than the developers. There have been local pleas that public transport could and should benefit, too.
• I did, at one point, sit on the Colchester/Wivenhoe/Tendring Committee looking at our Wivenhoe town proposals, but I soon realised that Committees are, by no means, the best way forward design-wise. Please correct me if I am wrong, but I gather that the basic layout of this new Project, so far, includes the number and type of housing units, and things like local amenities and transport have been agreed. ******* (redacted personal information) tells me that an architectural practice is helping to coordinate the next stages. If correct, this would mean that the developers and the Planners, with opposing points of view, would not be left to fight it out, leaving the usual mess of pastiche that results.
• And this is where I would like to see more profound input from your good selves and specialists. We all want the scheme to succeed. This must start with inspirational design to create a community – again, not possible by committee or even with democracy as we know it. (70% don't vote – perhaps a tiny number knowing they don't have the expertise; "25% on Party lines and a minute fraction, who carry most of the decision-making – a mixture of tub thumpers or NIMBIs.) Who, for example, would expect a Concerto, a Novel, or a painting to be designed by a Committee?
• This is no way to decide on highly subjective design issues, and architecture is, or used to be, an Art. You only have to look at our pre-industrial revolution buildings to see that we have evolved no twentieth-century return of that art. For a trained architect, like me, with many years on the rock face, it is difficult enough. Of course, one can incorporate green open spaces, and one can and must make the housing efficient, ecologically, net zero and cutting CO2 emissions. But here, too, ideas continue to evolve – timber, an authentic Essex tradition (not pastiche, please), is now back in fashion because brick and concrete use a vast amount of energy in their manufacture, and prefabricating is making building more efficient and layouts more person orientated and flexible. More new homeowners are buying off the drawing board, so to speak. They would have some say in a well-ordered prefab system, with lots of choices about layouts – kitchen /dining, open plan, avoidance of waste of space in corridors and, almost as important as any, making the voids in roof spaces useable and not full of trusses. Although cheaper initially to the developers, this is a terrible waste of space, which, in the long term, is expensive to restructure.
• How can planners and developers, with their limited and conflicting goals, cope with rational answers for all our sakes? Even Mr Gove has got into the act! I came across a few helpful tips about creating a community recently, like, as a starting point, are there any features already on the site? Perhaps an old cottage or a barn. Are there some old trees or good hedgerows which can help form a sense of place? Are there some splendid views of the existing landscape that should be exploited? (Some of our new developments stick a garage in the most fabulous positions.)
• New homes must be exciting and stimulating places to live in and should incorporate peoples' own lifestyles. They must, too, foresee the owner's future needs as far as possible. It is all challenging, especially under the present systems, but it can be done. The Quakers managed it one hundred and fifty years ago.
• Finally, another mantra of mine has been that a building development is incomplete until it has a planted and thriving landscape. Here we are blessed with experts in the area who will be eager to contribute.
I trust that some of these thoughts might be helpful.

Change suggested by respondent:

-

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

48 Object

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES
Respondent: Ria Lockwood [71]

Summary:

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.

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:

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

68 Object

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

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

Summary:

The policy is supported for various reasons listed in the full comments. However, it is requested that part I of the policy (or the policy justification) is amended to explain how achieving Active Design principles should be considered by developers in practice.

Full text:

• The reference to the development achieving Active Design in part A of the policy is welcomed as this will contribute to delivering the wider vision for the Garden Community and would accord with Government policy in the NPPF. However, for accuracy it should refer to and 'accord with Active Design principles'. To support the delivery of this requirement, it is requested that Part I of the policy (or the policy justification) is amended to explain how this should be considered by developers in practice. For example, Active Design criteria have been incorporated into the new Health Impact Assessment guidance prepared by the EPOA so therefore Active Design could be assessed as part of a HIA. Alternatively, a Design and Access Statement or a specific Active Design assessment could assess how Active Design opportunities have been considered through completing the checklist in the Active Design guidance.
• The requirement in part B of the policy to provide for places which promote health and well-being is welcomed as this is consistent with the Active Design guidance.

Change suggested by respondent:

It is requested that Part I of the policy (or the policy justification) is amended to explain how Active Design can be achieved by developers in practice. For example, Active Design criteria have been incorporated into the new Health Impact Assessment guidance prepared by the EPOA so therefore Active Design could be assessed as part of a HIA. Alternatively, a Design and Access Statement or a specific Active Design assessment could assess how Active Design opportunities have been considered through completing the checklist in the Active Design guidance.

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

83 Object

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

Respondent: Dr Christina Volkmann [102]

Summary:

The statements here are so general, they're meaningless. For example: "Well-designed and integrated public realm with high quality landscape design, street furniture and other distinctive features that help to create a sense of place; [...]" What exactly does this mean for THIS particular community? Does this 'public realm', for example, include designated places of worship (for different faith groups)?

Full text:

The statements here are so general, they're meaningless. For example: "Well-designed and integrated public realm with high quality landscape design, street furniture and other distinctive features that help to create a sense of place; [...]" What exactly does this mean for THIS particular community? Does this 'public realm', for example, include designated places of worship (for different faith groups)?

Change suggested by respondent:

I would like to see a lot more concrete detail of what is being proposed, how this will be financed and built, what the time frames are and what planning contingencies are in place should the financial situation change. Not another HS2-type white elephant... I really don't want to be pessimistic and I do with the project well, but, as a continental European, I have yet to see in this country an example of community-focused rather than (commercial) developer-focused development.

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

87 Object

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

Respondent: Mr David Mead [27]

Summary:

• 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.

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:

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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

108 Support

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

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

Summary:

GC Policy 3, Part B (page 54). For clarity and consistency with other reference in the Draft Plan, it recommended that reference is added to the “multifunctionality” of green infrastructure.

Change the third bullet in GC Policy 3: Part B (page 54) to read as follows:

“Provide for a network of integrated multifunctional green and blue infrastructure features.”

Full text:

GC Policy 3, Part B (page 54). For clarity and consistency with other reference in the Draft Plan, it recommended that reference is added to the “multifunctionality” of green infrastructure.

Change the third bullet in GC Policy 3: Part B (page 54) to read as follows:

“Provide for a network of integrated multifunctional green and blue infrastructure features.”

Change suggested by respondent:

-

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

137 Support

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

Respondent: Rev Pauline Scott [136]

Summary:

In the absence of a church building, I would ask that consideration is given to how community spaces and buildings are suitable and available for faith groups to meet. Consideration also needs to be given to burial spaces alongside spaces where ashes may be interred or scattered - quiet spaces where residents may go to mourn.

Full text:

In the absence of a church building, I would ask that consideration is given to how community spaces and buildings are suitable and available for faith groups to meet. Consideration also needs to be given to burial spaces alongside spaces where ashes may be interred or scattered - quiet spaces where residents may go to mourn.

Change suggested by respondent:

-

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

151 Object

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

Respondent: Mrs Susan Burns [69]

Summary:

People will not use the transit systems or cycle to work, how do you get three children to school on a bike! How do you get to work if the transit system or bus does not follow your route, what if you work on the outskirts of town, or Ipswich, London, Cambridge etc. the transit system won't help you there. The transit system will have to follow an already congested area and by diminishing facilities on the roads for cars for a bus Lane will only add more congestion for residents, a foolish and unworkable idea.

Full text:

It is clear by seeing other large developments that the character of such buildings will not compliment or 'fit into' the character of the existing properties in this area. I think it's incredibly naive to put into a plan idealistic notions that people will use cycling lanes or bus routes to travel to schools (which by the way are completely full) and work. Colchester installed cycling lanes at huge expense I'm sure along the bottom of Harwich Road to Ipswich Road, a route I travel on in my car, and have yet to see more than a handful of people using in all the time it's been built!

Change suggested by respondent:

Drastically reduced and a realistic solution to the problem, building this massive development, basically a new town on the outskirts of a Roman Town, built on a hill with little infrastructure to adapt successfully is foolhardy at best

Legally compliant: No

Sound: No

Comply with duty: No

Appear exam: Written Representation

Attachments: None

162 Object

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

Respondent: Mr William Sunnucks [113]

Summary:

Policy GC3: Buildings, Places and Character
Naming: the Garden Community urgently needs a name if it is to have its own recognisable identity. Scarcely anyone has heard about Colchester's biggest development and TCBGC is a mouthful to explain on the doorstep. I suggest that a shortlist be prepared and put out to consultation with the public.

Design requirements: there has been no proper consideration of the high costs created by the regulations in GC3. The financial appraisal adds 10% to the build cost to allow for "Part L&F" which costs the project £94m and contributes to the financial viability problem.

Full text:

Policy GC3: Buildings, Places and Character
Naming: the Garden Community urgently needs a name if it is to have its own recognisable identity. Scarcely anyone has heard about Colchester's biggest development and TCBGC is a mouthful to explain on the doorstep. I suggest that a shortlist be prepared and put out to consultation with the public.

Design requirements: there has been no proper consideration of the high costs created by the regulations in GC3. The financial appraisal adds 10% to the build cost to allow for "Part L&F" which costs the project £94m and contributes to the financial viability problem.

Change suggested by respondent:

More work is needed to identify the compromises needed to make the plan deliverable. The cost of compliance with the heavy regulatory burden needs to be considered and more detail is needed on the 10% addition to build cost.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Appear exam: Appearance at the examination

Oral exam why: I hope to be of assistance to the Inspector: I have first hand experience of the costs of complying with regulations and a good grasp of the economics of the GC.

Attachments: None

163 Support

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

Respondent: Mr Christopher Burns [140]

Summary:

I broadly support this aspect of the Plan providing clear thought is given to the design of the new community and it is not allowed to 'drift' into bland structures, with limited open space, that offer little to enhance the development. If, as is stated, it adopts a 'landscape led approach' that genuinely allows for residents to have access to amenity space, and that protects the existing environment, the Plan will be positive.

Full text:

I broadly support this aspect of the Plan providing clear thought is given to the design of the new community and it is not allowed to 'drift' into bland structures, with limited open space, that offer little to enhance the development. If, as is stated, it adopts a 'landscape led approach' that genuinely allows for residents to have access to amenity space, and that protects the existing environment, the Plan will be positive.

Change suggested by respondent:

-

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

168 Support

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

Respondent: Mr Andrew Scott [141]

Summary:

Need to ensure that the planning permission has sufficient clout to ensure the intentions set out in this section are delivered.

Full text:

Need to ensure that the planning permission has sufficient clout to ensure the intentions set out in this section are delivered.

Change suggested by respondent:

-

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

181 Object

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

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

Summary:

- Question the use of the word beautiful in official planning policy.

Intro

- Respecting existing character should not be secondary to creating unique/distinctive neighbourhoods.

Part B

- Concern that re-prioritising parking will be detrimental in the mid-term.

Part C

- Design quality requirements is too brief and ambiguous.

Part D

- Street lighting should be directional to avoid light pollution.
- Designing out crime in GC will push crime into Elmstead.

Part G

- High housing density in conflict with adequate private amenity space.

Part H

- Impact of employment area will harm setting of Elmstead church.
- Non-listed heritage assets need extra protection.

Part I

- Heritage assets should be within an expanded Strategic Green Gap.
- Need further explanation around GC being 'self sufficient'

Justification

- HIA is insufficient.

Full text:

Please see Elmstead Parish Council official response submission document submitted to TCB Garden Community at tcbgardencommunity@colchester.gov.uk.

Change suggested by respondent:

Intro

-

Part B

- Less emphasis on de-prioritising parking.

Part C

- Greater clarity required regarding design quality – e.g. how many trees are required for a 'tree-lined street'.
- Need an early, innovative approach to a centralised, efficient waste solution scheme.

Part D

- Additional wording to require directional street lighting.

Legally compliant: Yes

Sound: No

Comply with duty: No

Appear exam: Appearance at the examination

Oral exam why: Our participation should be considered necessary as the Parish Council representing the area and community most affected.

Attachments:

EPC Representation - https://tcbgardencommunity.oc2.uk/a/t6

210 Object

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

Respondent: Ms Martine Ward [137]

Summary:

In a fairy tale, this project is a perfect world. But in the real world it will be a nightmare.. Nothing is defined at all. If built wrongly they will be 3 different neighbourhoods. Money will change what is planned, as they will be cutting corners to save money, Nothing has been refined, nothing has really been planned. It is left to the developers who do not care for the damages they cause, for the errors they make. It is left to the local people to deal with. Everything is general, so open to be abused by the developers.

Full text:

In a fairy tale, this project is a perfect world. But in the real world it will be a nightmare.. Nothing is defined at all. If built wrongly they will be 3 different neighbourhoods. Money will change what is planned, as they will be cutting corners to save money, Nothing has been refined, nothing has really been planned. It is left to the developers who do not care for the damages they cause, for the errors they make. It is left to the local people to deal with. Everything is general, so open to be abused by the developers.

Change suggested by respondent:

To create this project where it truly belongs to. It is urban, it is modern, it is supposed to have everything at hand. Therefore why pushing it in a rural community, why letting the developers free to toy with us? They haven't thought of places of worship, of hospitals, of police station, of fire station, of ambulance station, of disposal of rubbish, of pubs, of cinema... This project is a pie in the sky waiting to prove its true worth of blot on the landscape. A building development is incomplete until it has a proper /suitable infrastructure, a planted and thriving landscape.

Legally compliant: No

Sound: No

Comply with duty: No

Appear exam: Written Representation

Attachments: None

215 Object

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

Respondent: Historic England (Mr Andrew Marsh, Historic Environment Planning Adviser, Planning Group) [129]

Summary:

As a general comment, Historic England welcomes emerging plan and work undertaken to date. Whilst we consider many aspects of the DPD to be sound, we have identified some issues which do compromise the overall soundness of the plan. In particular we remain concerned regarding the timescales for some of the technical evidence needed to inform this Plan. Without this information the Plan is not effective in protecting and enhancing the historic environment and is therefore not sound.'

Full text:

Thank you for consulting us on the Submission version of the Tendring Colchester Borders Garden Community Development Plan Document, May - June 2023 (hereafter referred to as the Plan). As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and therefore welcome the opportunity to comment on this document.

Summary

We have reviewed the Regulation 19 Development Plan Document (DPD) and consultation material with a view to providing advice on heritage matters. As a general comment, Historic England welcomes emerging plan and work undertaken to date. Whilst we consider many aspects of the DPD to be sound, we have identified some issues which do compromise the overall soundness of the plan. Under paragraph 35 of the National Planning Policy Framework, some aspects of this Plan are unsound as they have not been positively prepared, are not justified, effective, or consistent with national policy.

In particular we remain concerned regarding the timescales for some of the technical evidence needed to inform this Plan. Without this information the Plan is not is not effective in protecting and enhancing the historic environment and is therefore not sound.

GC POLICY 3: PLACE SHAPING PRINCIPLES

Timescales for technical evidence - Potential mitigation and enhancements not included in policy

We remain concerned that the preparation of a mitigation strategy for heritage is being deferred to the planning application stage, hampering the effectiveness (and therefore the soundness) of GC Policy 3: Place Shaping Principles. This advice is consistent with your own adopted local plan policy below, that confirms that this evidence is needed to inform this further DPD. Tendring District Local Plan 2013 - 2033 and Beyond Section 1, Policy SP 9 - Tendring/Colchester Borders Garden Community states:

The adoption of the DPD will be contingent on the completion of a Heritage Impact Assessment carried out in accordance with Historic England guidance. The Heritage Impact Assessment will assess the impact of proposed allocations upon the historic environment, inform the appropriate extent and capacity of the development and establish any mitigation measures necessary (our emphasis).

Whilst a Heritage Impact Assessment (HIA) has been prepared (Turley's, February 2022), it (by its own admission) lacks proper consideration of what mitigation and enhancement measures might be required and how this/these could be achieved. On this point, paragraph 5.9 of the Councils' HIA recommended that:

…. a landscape and visual impact assessment (LVIA) for the whole TCBGC development is undertaken (in addition to those prepared for the road application) to consider the implications of the development on the landscape, visual impact and heritage of the area. This is of particular importance to assist the assessment of impacts in the Elmstead area which has been highlighted in this report as being particularly sensitive to the proposals. Representative views should encompass heritage viewpoints to inform the understanding of the effects on the identified heritage assets. This can then be used to inform any mitigation strategy (including landscaping), although it is suggested that if possible the location/extent of the proposed employment area is reconsidered (our emphasis).

GC Policy 3: Place Shaping Principles, Part I: Planning Application Requirements of the Draft Plan, attempts to plug this gap by requiring an LVIA, HIA and Mitigation Strategy prior to the determination of any planning application for the site (GC Policy 3: Place Shaping Principles, Part I: Planning Application Requirements).

However, given the potential impacts identified within the HIA (the Councils' HIA

suggests that the development of the TCBGC site allocation would potentially result in significant effects to the Grade II* listed Elmstead Hall, the Grade I listed Church of St Anne and St Laurence and the Grade II listed Allen's Farmhouse) then this work should be undertaken now so that any specific recommendations for mitigation and enhancement can be incorporated into the Draft Plan.

This approach would also help satisfy NPPF paragraph 16d which requires Plan policies to be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals, and PPG at paragraph 027 Reference ID: 61-027-20180913 Revision date: 13 09 2018 that states, 'Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development'. The best way to achieve this is with site-specific criteria, and ideally accompanied by a concept diagram.

To this end we recommend that a Landscape and Visual Impact Assessment (LVIA) and (further) Heritage Impact Assessment and Mitigation Strategy should be prepared prior to Examination, and mitigation and enhancement measures included within GC Policy 3: Place Shaping Principles, to ensure that these are implemented. If this is not feasible, then Part I, bullet 2 of the policy should be amended to require that this work is prepared prior to the further masterplanning so that it can inform this work. This will ensure that the policy (and therefore the DPD) is effective in protecting and enhancing the historic environment, and in so doing help the Council to demonstrate that its' Plan sets out a positive strategy for the historic environment, as per NPPF paragraph 190.

Finally, whilst we welcome the reference to heritage assets within Part I of the policy, their setting is not mentioned. This omission is important as these heritage assets are most likely to experience harm via development within their settings.

We therefore recommend that criterion 2 is revised to read, "…significance of the Grade II* listed Elmstead Hall, the Grade I listed Church of St Anne and St Laurence and the Grade II listed Allen's Farmhouse, and the Round Barrows (Scheduled Monument) on Annan
Road, and their settings…"

Potential for Non-designated heritage assets of equivalent significance to scheduled monuments with the Tendring Colchester Borders Garden Community Plan are

Linked to the need for additional assessment to inform further masterplanning of the site, we take this opportunity to highlight the potential for archaeology of national

significance within the Tendring Colchester Borders Garden Community Plan area, and that this should be investigated as part of the further HIA.

The Tendring Colchester Borders Garden Community Plan area is within the wider setting of two Scheduled Bronze Age barrow cemeteries; one immediately to the south-west of the site (the Group of barrows at Annan Road, LEN 1464139), and another to the north (the Crop Mark S of Ardleigh SM, LEN 1002146).

The Scheduled Monument at Ardleigh (Crop mark site S of Ardleigh, LEN 1002146 comprises cropmarks across a large area indicating many ring-ditches and an extensive complex of trackways and ditches enclosures. Limited archaeological excavations have identified the remains of a large Bronze Age cemetery complex, comprising the remains of both barrows and urnfield, as well as Iron Age occupation, a Roman pottery production centre and a small later Roman cemetery.

The Scheduled Monument is situated within a similar landscape setting to the Garden Community Plan area - within (or above) the valley of a tributary of the River Colne - Salary Brook (the Scheduled Monument is right at the head of the valley).

At the other end of the tributary, where it meets the River Colne, there is also a group of Scheduled Bronze Age Barrows (Group of barrows at Annan Road, LEN 1464139), and their location is surely not by chance either.

Both Scheduled Monuments seem deliberately located within similar landscape settings, and consequently, there is high potential for further archaeological remains to be located between them, above the floodplain of the Salary Brook (as well as good environmental within the floodplain itself), within the Tendring Colchester Borders Garden Community Plan area. If present, these could be of national significance as per NPPF footnote 68 and would therefore be considered subject to the policies for designated heritage assets.

We would therefore expect this to be investigated as part of the further HIA and Mitigation Strategy, ideally now, but if this is not feasible ahead of further masterplanning so that it can inform (if required) how development will be laid out, and which areas will be protected from development. We therefore recommend that Part I, criterion 3 is expanded to cover this aspect. Again, this information will ensure that the DPD is effective in protecting and enhancing the historic environment and help the Council to demonstrate that its' Plan sets out a positive strategy for the historic

environment, as per NPPF paragraph 190.

GC Policy 1: Land uses and spatial approach
Part E: Elmstead Strategic Gap

Whilst we welcome that there are specific measures for the historic environment in
Part E of this policy, we request that it is amended to read:

The 'Business Park' will be designed and landscaped in a manner that ensures an appropriate transition between built development and the open countryside forming part of the 'Elmstead Strategic Green Gap'. Development will be required

to respect the setting of the designated heritage assets of the Grade I listed Church of St. Anne and St. Lawrence, Grade II* listed Elmstead Hall and Grade II listed Allens Farmhouse
and the Round Burrow.

This will clarify that these are designated heritage assets, therefore providing justification for (and therefore supporting the soundness of) the identification of a Strategic Gap in this location.

Finally, Part E, second paragraph states:

“Development will only be supported where….it represents the provision of appropriate development for a countryside location…”

We take this opportunity to remind you that what is considered ‘appropriate development’ should be informed by the further HIA (referred to throughout this letter) in consultation with Historic England.

Conclusions

I hope that you find the above comments helpful. We’d like to stress that this response is based on the information provided by the Councils in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment.

Change suggested by respondent:

-

Legally compliant: Not specified
Sound: No
Comply with duty: Not specified
Appear exam: Not specified
Attachments:
Historic Engalnd - https://tcbgardencommunity.oc2.uk/a/s7

228 Object

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES
Respondent: Latimer (Tendring Colchester Borders Garden Community) Developments Limited [127]
Agent: Lichfields (Miss Charlotte Walker, Planner) [124]

Summary:

Latimer is supportive of the approach to GC Policy 3 ‘Place Shaping Principles’ overall and broadly. However, Latimer requests greater flexibility to be added to some of the wording and also provides some comments on the historic environment to ensure the approach is consistent with national planning policy.

Full text:

See attachment

Change suggested by respondent:

Changes to wording of Parts B, C, D, E and H. See attached document.

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

237 Object

Document Element: GC POLICY 3: PLACE SHAPING PRINCIPLES

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

Summary:

Development south of the A133 adjacent to the historic park will lead to harm to park and setting of Wivenhoe.

Full text:

See attached letter for full text

Change suggested by respondent:

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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