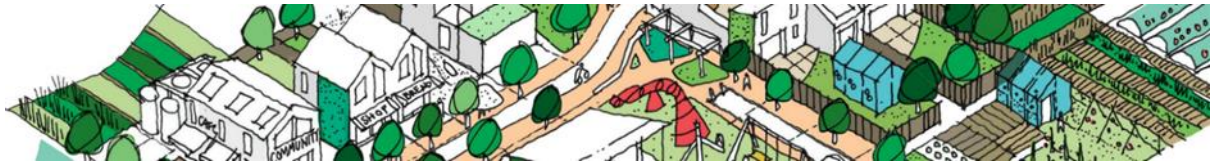
SCG05



Statement of Common Ground with Natural England

Tendring Colchester Borders Garden Community
Development Plan Document – Submission Version

April 2024

1. INTRODUCTION AND PURPOSE

The purpose of this Statement of Common Ground (SoCG) is to identify areas of common ground and any unresolved issues in relation to the representations made by Natural England (NE) to the Tendring Colchester Borders Garden Community (TCBGC) submission version Development Plan Document (DPD).

NE submitted a number of representations to the Regulation 19 Submission Version Consultation (May-June 2023). This SoCG seeks to establish areas of agreement between Tendring District Council (TDC), Colchester City Council (CCC) and Essex County Council (ECC) 'The Councils' and NE, and also proposes resulting minor changes to the Submission Version Plan prior to public examination. The Inspector is asked to consider these changes, which are acceptable to both parties. A track changed version of Policy GC2 – Nature, and its supporting text has been included at section 8 of this document.

Text proposed to be inserted in *italicised and underlined*
Text proposed to be removed in ~~strikethrough~~

2. LIST OF SIGNATORIES AND ROLES

The Councils
Name: Amy Lester
Role: Garden Community Planning Manager

Natural England (NE)
Name: Robert Bishop
Role: Senior Advisor – West Anglia Area Team

3. SUMMARY OF AGREED POSITION

NE has been engaged throughout the plan-making process. This Statement identifies where areas of agreement have been reached, including revised wording to policies and/or supporting text. The table in section 6 outlines NE's representations and the agreement reached between the Councils and NE.

4. UNRESOLVED ISSUES

There are no unresolved issues or areas of uncommon ground.

5. SIGNATURES

The Councils and NE confirm that this SoCG reflects the joint working by both organisations to address identified matters.

Signed on behalf of the Councils by:
Name: Amy Lester Position: Garden Community Planning Manager Date: 10.04.2024
Signed on behalf of Natural England by:
Name: Robert Bishop Position: Senior Advisor – West Anglia Area Team Date: 10/04/2024

6. Table of reps/comments

Reps From NE	Policy and Part	Councils Response	Proposed Change	NE Response	Agreed?
Rep ID. 223 GC Policy 2 – Nature					
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	GC2, Part A	Comment Noted. The policy is considered sound, however, upon further assessment the Councils consider that a proposed change to the DPD could be appropriate.	**Amend GC Policy 2, to add:** *Part *: Suitable Accessible Natural Greenspace (SANG)* *Proposals will be required to provide an appropriate amount of Suitable Accessible Natural Greenspace (SANG), in accordance with Natural England (NE) guidance. This will reduce the amount of day-to-day recreational trips to the protected habitat sites Essex coast. Proposals to incorporate SANG within the new Country Park will be supported where they conform to the principles of the Strategic Masterplan and where evidence, including visitor surveys, is provided to demonstrate that the Salary Brook Local Nature Reserve has sufficient capacity to accommodate any increased visitor usage proposed in order to count towards SANG provision.* *The Council will work with Natural England, landowners and stakeholders to agree the extent of SANG provision for each phase of the Garden Community, which must link into a wider network of footpaths, green infrastructure and public open space.* *Proposals must demonstrate how SANG, and access to it, will be provided for each relevant phase of the development, including access to temporary SANG where required.*	We agree with the suggested changes to the wording of GC Policy 2.	Yes

around 145 hectares of suitable, natural greenspace.					
Rep ID. 223 GC Policy 2 – Nature					
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: **Wintering Bird Surveys** "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	GC2, Part C	Comment Noted. The policy is considered sound, however, upon further assessment the Councils consider that a proposed change to the DPD could be appropriate. Further, in response to the proposed amendment to the policy wording an update to the HRA/AA has been prepared.	**Amend GC Policy 2, Part C to read:** Proposals will need to provide the following: • Are supported with appropriate ecological surveys where necessary. • Where there is reason to suspect the presence of a protected species (and impact to), or Species/Habitats of Principal Importance, proposals should be accompanied by an ecological survey assessing their presence and, if present, the proposal must be sensitive to, and make provision for their needs and demonstrate the mitigation hierarchy has been followed. • Will minimise fragmentation of habitats. • Maximises opportunities for the preservation, restoration, enhancement, and connection of natural habitats in accordance with the Local Nature Recovery Strategy or future replacements. *Before granting planning consent, wintering bird surveys will be undertaken at the appropriate time of year to identify any offsite functional habitat. In the unlikely event that significant numbers are identified, development must firstly avoid impacts. Where this is not possible, development must be phased to deliver habitat creation and management either on or off-site to mitigate any significant impacts. Any such habitat must be provided and fully functional before any*	We agree with the suggested changes to the wording of GC Policy 2 and have reviewed the updated HRA.	Yes

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.			*development takes place which would affect significant numbers of SPA birds.* Sensitive habitats should be buffered with additional planting or other agreed appropriate measures wherever possible to discourage access. Appropriate interpretation/signage will be required to help divert visitors away from sites that are sensitive to recreational disturbance, including the use of marketing and promotional material at the point of house sales. Ecologically rich buffer landscapes against existing and new road corridors will be required. The minimum widths of these will be agreed through an appropriate design code or similar.		
Rep ID. 224 GC Policy 2 – Nature					
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:	GC2, New* Part	Comment Noted. The policy is considered sound, however, upon further assessment the Councils consider that a proposed change to the DPD could be appropriate. Further, in response to the proposed amendment to the policy wording an update to the HRA/AA has been prepared.	Amend GC Policy 2, to add: *Part *: Air Quality* *Proposals that might lead to a deterioration in air quality or to an exceedance of the national air quality objectives, either by itself, or in combination with other development, will require the submission of an Air Quality Assessment to be carried out in accordance with industry best practice. This should address:* *a) The cumulative effect of further emissions and screening for air quality impacts.*	We agree with the suggested changes to the wording of GC Policy 2 and have reviewed the updated HRA.	Yes

"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			b) *Where identified as being required, the proposed measures of mitigation, using good design, technical solutions and offsetting measures that prevent the deterioration of air quality and ensure that National Air Quality Objectives are not exceeded.* c) *The identification of measures to secure the safety and satisfactory quality of life for the future occupiers. Development must not result in an increased exposure to poor air quality, including odour, fumes and dust, particularly where developments might be occupied or used by vulnerable people.* *The Air Quality Assessment must be informed by traffic scoping modelling for each relevant phase of development and is required to assess 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.* *All development proposals should promote a shift to the use of sustainable low emission transport modes, to minimise the impact of vehicle emissions on air quality.* **Amend GC Policy 2, Part I to add:** *7. Proposals must be supported by an Air Quality Assessment to be informed by traffic scoping modelling for each relevant phase of development in accordance with industry best practice.*		

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.					

7. POLICY GC2 – TRACK CHANGED TEXT

GC POLICY 2: NATURE

The approach for the Garden Community is to protect and enhance the existing green-blue infrastructure network for the benefit of people and wildlife. There are numerous natural and historic assets, such as ancient woodlands and hedgerows, and the Wivenhoe Park Registered Park and Garden, within or adjoining the Garden Community. Development will protect and enhance existing assets and incorporate these into a well-connected green-blue infrastructure network.

Biodiversity, geology, heritage assets, archaeology and landscape character will be protected and enhanced. A multifunctional green-blue infrastructure network will be provided within and link beyond the Garden Community, providing space for nature, recreation and encouraging active travel; creating settings for the built environment; and enhancing local landscape character. This includes a country park along the western boundary of the Garden Community and a strategic east-west green corridor. Green-blue infrastructure will be an integral part of and means to improve the quality of the built environment and should optimise the provision for additional wildlife habitat.

Part A: Green-Blue Infrastructure

The Strategic Masterplan includes a Nature Layer for the whole site clearly demonstrating green links, including green corridors, within and beyond the site. The Nature Layer is coordinated with active travel networks to maximise the potential for routes through green infrastructure to be used for travel and leisure.

Connections must be made to the existing Colchester Orbital (a circular walking and cycling route around the City's perimeter) which runs along Salary Brook and through the site, linking key open spaces and public rights of way (PRoW). The Colchester Orbital will be retained and enhanced as a significant green link within the development, connecting to substantial green corridors within the development formed around the existing green infrastructure network.

Existing landscape features, PRoW and the network of lanes within the site should be retained, enhanced and incorporated into the development to form part of the green-blue infrastructure network and public realm wherever possible. A variety of new open spaces and other green-blue infrastructure will be created, including a Country Park along the Salary Brook corridor, including the slopes, and multiple green corridors. Proposals will need to include details of a green-blue infrastructure network, how it complies with the strategic masterplan and must demonstrate how all open spaces connect to this network.

Green-blue infrastructure must deliver multiple benefits and proposals must demonstrate or provide:

- How the amount, typology and function of new open space and other green-blue infrastructure meets the standards in the Colchester and Tendring Sports, Recreation and Open Space Strategy (2022) or any updates to this strategy.
- How biodiversity enhancement and net gain measures will be incorporated, including the use of habitat restoration and natural regeneration.
- How the design supports the dispersal and migration of individual species and whole habitats, either as part of a regular movement pattern or through migrations in response to climate change.
- How the green-blue infrastructure proposed will be managed and maintained as part of the stewardship model.
- That the strategy for selection of trees and other plants has been chosen to enhance both nature and beauty, for climate resilience and for food. For example, through drought tolerant or wetland planting approaches as appropriate.
- Details of street trees and hedgerows and that appropriate measures are in place to secure long-term maintenance of newly planted trees.
- Details of how existing trees and hedgerows will be incorporated into the development.
- How natural or free play areas have been incorporated into the urban setting as well as green spaces.
- The provision of areas of wild bird cover for the benefit of farmland birds.
- The creation of verges of priority habitat, hedgerow, wildflower rich or rough grassland along roads, streets where appropriate, and pedestrian and cycle networks.
- High quality, sustainable design and selection of public furniture, including play equipment, and lighting (where appropriate), which is essential to ensure that places are accessible and inclusive.
- Inclusive and accessible to all, including people with varied mobility and sensory needs.

~~Proposals will be required to provide an appropriate amount of Suitable Accessible Natural Greenspace (SANG), in accordance with Natural England (NE) guidance. This will reduce the amount of day-to-day recreational trips to the sensitive Essex coast. Proposals to incorporate the SANG within the new Country Park will be supported where they conform to the principles of the Strategic Masterplan and where evidence, including visitor surveys, is provided to demonstrate that the Salary Brook Local Nature Reserve has sufficient capacity to accommodate any increased visitor usage proposed in order to count towards SANG provision.~~

Part B: Suitable Accessible Natural Greenspace (SANG)

Proposals will be required to provide an appropriate amount of Suitable Accessible Natural Greenspace (SANG), in accordance with Natural England (NE) guidance. This will reduce the amount of day-to-day recreational trips to the protected habitat sites Essex coast. Proposals to incorporate SANG within the new Country Park will be supported where they conform to the principles of the Strategic Masterplan and where evidence, including visitor surveys, is provided to demonstrate that the Salary Brook Local Nature Reserve has sufficient capacity to accommodate any increased visitor usage proposed in order to count towards SANG provision.

The Council will work with Natural England, landowners and stakeholders to agree the extent of SANG provision for each phase of the Garden Community, which must link into a wider network of footpaths, green infrastructure and public open space.

Proposals must demonstrate how SANG, and access to it, will be provided for each relevant phase of the development, including access to temporary SANG where required.

Part ~~B~~ *C*: Integrating Green and Blue (water) Spaces into Built Form

A key principle and part of the distinctive character of the Garden Community will be the green-blue infrastructure network and celebration of the natural and historic environment. Proposals should take every opportunity to integrate green and blue spaces and will be required to demonstrate, both spatially and technically, how they have been integrated into the built form. Examples include: tree lined streets or streets that contain hedgerows appropriate to local character, habitats, and species; insect-attracting plants, hedgerows, log piles, and other places of shelter for wildlife refuge/hibernation within structural landscaping and open spaces; hedgehog friendly features in residential garden boundaries to create linked habitat; dark corridors for bat foraging; green walls and roofs and other measures of incorporating trees and plants into buildings; bat boxes, bricks or lofts and bird boxes; green roofs; and Sustainable Drainage Systems (SuDS).

Part ~~C~~ *D*: Protection of Biodiversity

Proposals will need to provide the following:

- Are supported with appropriate ecological surveys where necessary.
- Where there is reason to suspect the presence of a protected species (and impact to), or Species/Habitats of Principal Importance, proposals should be accompanied by an ecological survey assessing their presence and, if present, the proposal must be sensitive to, and make provision for their needs and demonstrate the mitigation hierarchy has been followed.
- Will minimise fragmentation of habitats.
- Maximises opportunities for the preservation, restoration, enhancement, and connection of natural habitats in accordance with the Local Nature Recovery Strategy or future replacements.

Before granting planning consent, wintering bird surveys will be undertaken at the appropriate time of year to identify any offsite functional habitat. In the unlikely event that significant numbers are identified, development must firstly avoid impacts. Where this is not possible, development must be phased to deliver habitat creation and management either on or off-site to mitigate any significant impacts. Any such habitat must be provided and fully functional before any development takes place which would affect significant numbers of SPA birds.

Sensitive habitats should be buffered with additional planting or other agreed appropriate measures wherever possible to discourage access. Appropriate interpretation/signage will be required to help divert visitors away from sites that are sensitive to recreational disturbance, including the use of marketing and promotional material at the point of house sales. Ecologically rich buffer landscapes against existing and new road corridors will be required. The minimum widths of these will be agreed through an appropriate design code or similar.

Part ~~D~~ *E*: Biodiversity Net Gain

- Proposals must deliver a minimum of 10% measurable biodiversity net gain across the whole site with gains delivered either onsite or immediately adjacent to the site in accordance with the mitigation hierarchy, and must follow the latest Defra Metric, and its accompanying guidance, as well as local guidance where applicable. Initial high-level testing of BNG calculations of the strategic masterplan indicate that in excess of 10% can be achieved on average across the masterplan allocation. As such the ambition is to achieve a BNG of 15% on average across the whole masterplan.
- Biodiversity net gain must be delivered in addition to following the mitigation hierarchy, sound ecological principles, and overall high quality urban and landscape design.
- As a priority, impacts on moderate and high distinctiveness habitats must be avoided wherever feasible.
- Biodiversity net gain should include measures at the strategic and neighbourhood level. Other street and household level enhancements should form part of the general biodiversity and landscape enhancement measures.
- Biodiversity net gain calculations should be completed for the area covered by the Strategic Masterplan and updated in respect of each individual development proposal. Habitat enhancement and creation relating to each proposal should ideally be contained within their respective boundary where this will deliver the best outcomes for biodiversity. There is a preference for biodiversity offsetting to be defined by cross-referenced plans and located within the Garden Community. The Councils will provide coordination to ensure no double-counting between proposals. The Council will work with developers to maintain iterative biodiversity net gain accounting for the entire Garden Community as proposals come forward. Habitat enhancement and creation for delivering biodiversity net gain within the Strategic Green Gaps, Salary Brook Country Park, SANG and SuDS will be supported, where true additionality through stacking of ecosystem services can be demonstrated.

Part ~~E~~ *F*: Tree Planting

Existing trees on the site, including hedgerows, should be retained where appropriate. Opportunities should be taken to connect patches of existing woodland within the Country Park through tree belt planting and a tree belt buffer should be included along the southern edge of the Country Park, adjacent to the A133, to create an attractive edge to development and provide screening. A variety of new trees will be planted (or allowed to regenerate where appropriate such as in the proposed country park and other net-gain areas), to include:

- Street trees.
- Trees in gardens.
- New and enhanced areas of woodland.
- Orchards.
- Hedgerows with trees.

Areas for planting or regeneration should be set out and agreed in the appropriate landscape and green-blue infrastructure strategies and management plans.

Part ~~F~~ *G*: Productive Landscapes

Allotments and a range of productive uses such as orchards, edible walkways and community gardens will be provided throughout the Garden Community to promote healthy lifestyles. Allotment provision must be well related to residential areas and community spaces, with suitable access arrangements, water supply and fencing. Allotments must sit sympathetically in the landscape and make provision for people with special educational needs and disabilities.

Part ~~G~~ *H*: Sustainable Drainage Systems and Blue Infrastructure

Proposals must include Sustainable Drainage Systems (SuDS) for the management and disposal of surface water, in preference to piped systems, to avoid any increase in surface water flood risk or adverse impact on water quality and to prevent harm to offsite wildlife sites. Proposals must demonstrate how the SuDS feature(s) reflect and respond to site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide.

SuDS should be designed as focal points by incorporating multifunctional green and blue infrastructure, provide amenity benefits, as well as linking habitats and creating enhanced areas for biodiversity by incorporating ditch habitat, reedbeds and pond networks. Consideration should be given to proposed health and safety measures for SuDS features and the design should address the usability, accessibility and safety of open space particularly for young children, the elderly and those with reduced mobility. Proposals must reduce post development run off rate back to the greenfield 1 in 1 year rate, with an allowance for climate change.

SuDS will be required to meet the following design criteria:

- The design must follow an index-based approach when managing water quality. Implementation in line with the updated Construction Industry Research and Information Association (CIRIA) SuDS Manual is required. Source control techniques such as green roofs, permeable paving and swales should be used so that rainfall runoff in events up to 5mm does not leave the site.
- Sensitively designed and integrated into green-blue infrastructure to create high quality public open space and landscaped public realm by providing viewpoints, footpaths, seating and signage where appropriate.
- Maximise opportunities to enhance biodiversity net-gain.
- Improve the quality of water discharges and be used in conjunction with water use efficiency measures.
- Function effectively over the lifetime of the development.
- The hierarchy of managing surface water drainage from any development in the Garden Community should be managed in accordance with this hierarchy: firstly, rainwater reuse; and secondly infiltration.

Proposals should be designed to include permeable surfaces wherever possible. Proposals for impermeable paving, including on small surfaces such as front gardens and driveways, will be strongly resisted unless it can be suitably demonstrated that this is not technically feasible or appropriate.

Part ~~H~~ *I*: Integration of A120-A133 Link Road Mitigation

A comprehensive approach is required to ensure that the environmental mitigation for the A120-A133 Link Road, as specified in the conditions of the approved planning application, is fully integrated into the design of the Garden Community. This could include integrating those elements contained in the Landscape Plan, Landscape and Ecological Mitigation and Management Plan (LEMMP), Ecological Design Strategy, Farmland Bird Mitigation Strategy and Biodiversity Monitoring Strategy, which are conditions in the planning consent, with the landscape, multifunctional green-blue infrastructure, and ecological measures for the Garden Community.

Part J: Air Quality

Proposals that might lead to a deterioration in air quality or to an exceedance of the national air quality objectives, either by itself, or in combination with other development, will require the submission of an Air Quality Assessment to be carried out in accordance with industry best practice. This should address:

a) *The cumulative effect of further emissions and screening for air quality impacts.*
b) *Where identified as being required, the proposed measures of mitigation, using good design, technical solutions and offsetting measures that prevent the deterioration of air quality and ensure that National Air Quality Objectives are not exceeded.*

c) *The identification of measures to secure the safety and satisfactory quality of life for the future occupiers. Development must not result in an increased exposure to poor air quality, including odour, fumes and dust, particularly where developments might be occupied or used by vulnerable people.*

The Air Quality Assessment must be informed by traffic scoping modelling for each relevant phase of development and is required to assess 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.

All development proposals should promote a shift to the use of sustainable low emission transport modes, to minimise the impact of vehicle emissions on air quality.

Part ~~I~~ *K*: Planning Application Requirements

1. Proposals must include a green-blue infrastructure plan, which demonstrates how the scheme reflects and complies with the Strategic Masterplan; the Colchester Tendring Open Space Strategy requirements; the Healthy Living and Play Strategy required by GC Policy 6; and demonstrate how green and blue spaces have been integrated into the built form.
2. Proposals must be supported with appropriate ecological surveys and landscape and visual impact assessments where necessary and include a biodiversity net gain calculation and biodiversity gain plan, which follows the latest Defra Metric and guidance on biodiversity net gain.
3. The Councils will require the developer to enter into an appropriate legal agreement to ensure the long-term establishment, management, maintenance and monitoring of biodiversity mitigation, compensation, and net gain measures for a minimum of 30 years as part of the grant of any planning permission. It is anticipated that the developer will need to achieve this by entering into an agreement with a suitably qualified and experienced nature conservation management organisation to deliver the creation, and management of habitat in a development of this scale.
4. An indicative Drainage Plan for the whole Garden Community must be prepared and approved in writing by the Councils before the determination of any planning application for development of the site.
5. Proposals must include a Drainage Plan and SuDS Management and Maintenance Plan, which demonstrates how the scheme reflects and complies with the Garden Community wide indicative Drainage Plan setting out the long-term management and maintenance arrangements.
6. Proposals must contribute to the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy 2018-2038 (RAMS), or successor document, to mitigate for the in-combination effects of increased recreational disturbance across Essex.
7. *Proposals must be supported by an Air Quality Assessment to be informed by traffic scoping modelling for each relevant phase of development in accordance with industry best practice.*

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