CC5

TCBGC - Affinity Water and Health Bodies, Update on Cooperation

The Councils have progressed and completed a series of Statements of Common Ground (SoCG) with Statutory Bodies and third parties as part of the Examination of the DPD. Completed and signed SoCG can be found in the Examination Library.

The Councils have also been cooperating with Affinity Water and health sector colleagues, and constructive positive progress has been made on SoCG with both parties, however these remain unsigned. In advance of the examination hearings due to be held on the 7th-10th May 2024, this note has been prepared for the Inspector to provide an overview of discussions and an explanation of the current position. The Councils will continue to make efforts to progress these documents and if either SoCG does get completed and signed during the course of the examination the Inspector will be informed as soon as possible.

Affinity Water

Affinity Water submitted three representations to the Regulation 19 consultation. These being:

- Rep ID.97, 98 and 99

Affinity Water have been engaged throughout the plan making process and have been working with the Councils to address identified matters raised in the representations. A DRAFT SoCG has been prepared and was informally agreed by Affinity Water by email dated the 21st March 2024. Despite attempts by the Councils to follow up, this was the last contact received from Affinity Water and the 'Strategic Policy Making' SoCG and detailed SoCG remain unsigned on their part.

Suggested modifications to the wording of CG Policy 8 'Sustainable Infrastructure' were outlined within the SoCG, these mirrored the suggested modifications as agreed in the SoCG between Anglian Water and the Councils (SCG02). The suggested modifications have been carried forward to the 'Schedule of Suggested Modifications' (CC4).

Please find attached to this update note the DRAFT SoCG prepared between the Councils and Affinity Water, along with the above noted email dated 21st March 2024.

Health

The Councils have been working in cooperation with health sector colleagues on a range of health-related matters including development of policies and proposals in the DPD. Details of this cooperation and an overview of health matters relating to the Garden Community can be found in the prepared 'Health Topic Paper' (TP1). Whilst the Councils and NHS colleagues would have liked to have completed a SoCG in the run-up to the examination hearings for the DPD, health colleagues are currently under significant pressure and the tight timescales for the examination have not been sufficient to achieve the full signing off process which would normally involve an all-service response from different sections of the NHS.

A DRAFT SoCG has been prepared to identify areas of common ground and any unresolved issues in relation to the representations made by the following Health Bodies to the Regulation 19 consultation:

- NHS Suffolk & North East Essex Integrated Care Board (SNEE ICB)

  Rep ID.272 and 273

- East Suffolk & North Essex NHS Foundation Trust (ESNEFT)

  Rep ID.266 and 276

- East of England Ambulance Service NHS Trust (EEAST)

  Rep ID.253, 254, 255, 256, 257, 258, 259, 260, 261 and 262

The representations received covered a range of issues, including suggested modifications to policy wording to update terminology, and increased healthcare, wellbeing and emergency services references throughout the DPD. They also included suggested modifications to GC Policy 6 to ensure that the policy represents an effective strategy for securing all types of healthcare infrastructure (both on and off-site) required to serve the Garden Community. Clarification over the scope and timing of future Health Impact Assessments (HIA) was also sought.

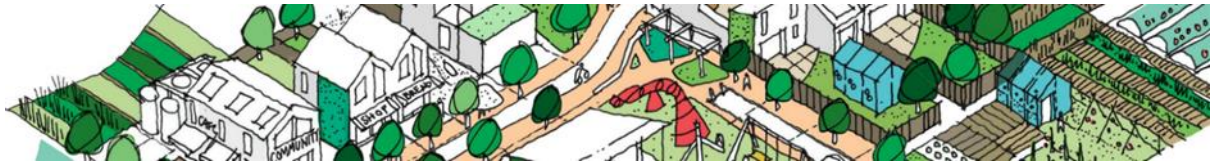
Suggested modifications have been discussed with health colleagues and these discussions are outlined within the attached DRAFT SoCG which unfortunately remains unsigned on behalf of the health bodies. Notwithstanding that the SoCG remains unsigned the Councils have carried forward those suggested modifications to the 'Schedule of Suggested Modifications' (CC4).

The Councils consider that the issue of providing healthcare infrastructure is adequately covered by the general requirements of GC Policy 6, Part E (as amended by the suggested modifications which the Inspector is asked to consider) and by the site specific health care points identified in the 2023 'Infrastructure Delivery, Phasing and Funding Plan' (EB17) within the Councils evidence base. This approach will permit flexible solutions to address changing forms of healthcare provision and will provide facilities that are based on the specific requirements identified in future HIAs.

END.

Attached documents:

- SoCG Affinity Water & Councils DRAFT
- Email dated 21st March 2024 from John Rumble (Affinity Water)
- SoCG Health Bodies & Councils DRAFT



Statement of Common Ground with Affinity Water

Tendring Colchester Borders Garden Community
Development Plan Document – Submission Version

DRAFT 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 Affinity Water (AW) to the Tendring Colchester Borders Garden Community (TCBGC) submission version Development Plan Document (DPD).

AW 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 AW, 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 GC8 – Sustainable Infrastructure and its supporting text has been included at section 7 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

Affinity Water (AW)
Name:
Role:

3. SUMMARY OF AGREED POSITION

DRAFT

AW 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 AW's representations and the agreement reached between the Councils and AW.

4. UNRESOLVED ISSUES

No unresolved issues.

5. SIGNATURES

The Councils and AW 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: 21.03.2024
Signed on behalf of Anglian Water by:
Name: Position: Date:

DRAFT

6. Table of reps/comments

Reps From AW	Policy and Part	Councils Response	Proposed Change	NE Response	Agreed?
Rep ID. 99 GC Policy 8 – Sustainable Infrastructure	Part D				
Water Efficiency Affinity Water propose a criteria based approach that is proportionate to new non-household developments that requires applicants to demonstrate water efficiency measures and water reuse have been incorporated in proposals. Where significant non-domestic water use is required developers should be required to submit a Water Resource Assessment with the planning application following consultation with the relevant water company. The requirement of 110 l/p/d should be replaced with 100 l/p/d Garden Communities are exemplars of sustainable and resilient development and should push boundaries to demonstrate that positive steps can be taken to deliver smarter and more efficient designs.		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 8, Part D to read: All buildings must include water efficiency measures and seek to achieve water neutrality. All homes must include water saving measures and, as a minimum, meet the ~~Building Regulations optional tighter water standard of 110 litres per person per day.~~ *the Government's Environment Improvement Plan (Water Efficiency Roadmap) standard of 100 litres per person per day.* Proposals should submit a water efficiency calculator report to demonstrate compliance*, and developers are encouraged to demonstrate how they can go further utilising integrated water management and a fittings-based approach to minimise potable water use.* *Non-residential development proposals must demonstrate that water efficiency measures and water reuse have been incorporated in proposals. Where significant non-domestic water use is required, a Water Resources Assessment should be submitted with the planning application following consultation with the relevant water company to ascertain water availability and feasibility of the proposed scheme.*	Agree to proposed policy amendment.	Yes

DRAFT

			Proposals must include clear evidence on the approach to water conservation, including the potential for the re-use of greywater and rainwater capture and re-use and should also provide the infrastructure to support options for rainwater re-use in the building design, e.g. rainwater harvesting systems, water saving devices, greywater recycling or other agreed solutions. The Councils will require safe systems and measures to be implemented for all new development within the Garden Community.		

7. POLICY GC8 – TRACK CHANGED TEXT

GC POLICY 8: SUSTAINABLE INFRASTRUCTURE

The Garden Community will be an exemplar development that addresses the climate emergency. The Garden Community will create energy efficient, sustainable buildings and places where communities can lead resilient and low carbon lifestyles, reducing the need to travel and a biodiverse landscape which incorporates carbon sequestration and natural flood management. This policy includes examples, but the focus is on achieving the end goals of a net zero carbon development and maximised water efficiency through the best solutions, which are likely to change over time. Proposals must comply with approved Design Codes that set standards in terms of climate change mitigation and adaptation and sustainable design.

Part A: Net Zero Carbon

All buildings must be net zero carbon in operation and achieve net zero operational energy balance onsite. The Councils will encourage carbon and energy positive buildings. A holistic area wide approach to energy and associated infrastructure will need to be implemented. Proposals must follow the principles of the energy hierarchy by reducing energy demand for both regulated and unregulated energy use (including heating, lighting, and cooling), ensuring efficient systems and renewable energy technology are in place, and that carbon dioxide emissions are minimised.

Proposals must demonstrate how new homes will achieve:

- Space heating demand less than 30kWh/m2/per annum.

DRAFT

- Total energy consumption (energy use intensity) of less than 40kWh/m2/annum.
- Onsite renewable generation to match or exceed the total energy consumption (energy use intensity).

Where the use of onsite renewables to match total energy consumption (energy use intensity) is demonstrated to be not technical feasible or economically viable onsite, renewable energy generation should be maximised as far as possible and/or connection to a district heating network. Where this is not possible, the residual energy should be offset by a contribution to an offset fund.

Compliance should be demonstrated by using an energy assessment tool proportional to the scale of the development.

The Councils will expect the integration of smart technology and integrated data services for controlling energy using activities and appliances.

Part B: Design and Construction

All buildings must be designed to reduce energy demand and maximise fabric energy efficiency including such measures as: building orientation; high levels of insulation of roofs, floors, and walls; maximising airtightness; and using solar gain through window/ door orientation whilst avoiding overheating. The Councils expect all applicable buildings to meet BREEAM 'Excellent' or 'Outstanding' and encourage Passivhaus or similar certification for residential buildings.

Part C: Renewable Energy

To achieve a net zero carbon development, that will not use fossil fuels, the Garden Community will generate energy from renewable sources and proposals will need to show how this has been maximized. Solar photovoltaic (PV) and either, air or ground source heat pumps should be installed on every building where feasible. The Councils will encourage the development of a district heating network(s) and/or smart local energy systems that are viable, maintained and managed in the long term.

Part D: Water Conservation and Wastewater

All buildings must include water efficiency measures and seek to achieve water neutrality. All homes must include water saving measures and, as a minimum, meet the ~~Building Regulations optional tighter water standard of 110 litres per person per day.~~ *the Government's Environment Improvement Plan (Water Efficiency Roadmap) standard of 100 litres per person per day.* Proposals should submit a water efficiency calculator report to demonstrate compliance*, and developers are encouraged to demonstrate how they can go further utilising integrated water management and a fittings-based approach to minimise potable water use.*

DRAFT

Non-residential development proposals must demonstrate that water efficiency measures and water reuse have been incorporated in proposals. Where significant non-domestic water use is required, a Water Resources Assessment should be submitted with the planning application following consultation with the relevant water company to ascertain water availability and feasibility of the proposed scheme.

Proposals must include clear evidence on the approach to water conservation, including the potential for the re-use of greywater and rainwater capture and re-use and should also provide the infrastructure to support options for rainwater re-use in the building design, e.g. rainwater harvesting systems, water saving devices, greywater recycling or other agreed solutions. The Councils will require safe systems and measures to be implemented for all new development within the Garden Community.

Part E: Green-Blue Infrastructure

In accordance with GC Policy 2, multifunctional green-blue infrastructure will be delivered across the Garden Community for biodiversity, flood and drought control, soil health, air quality, and reduced urban heat island effect. Proposals must demonstrate how the planting palette features a diverse range of plant species that are adaptable/ resilient to climate change. Details should be submitted of appropriate biosecurity standards for sourcing, quarantining, and inspecting plant material supplied to the development.

Part F: Digital and Fast Technology

Proposals must provide the new community with:

- For non-residential development: Ultra-fast Gigabit capable, future proofed broadband including a requirement for "open access" broadband infrastructure provided by at least two suppliers or a neutral host. This definition is likely to evolve over the plan period and consideration of an up-to-date definition of ultra-fast will be made at the time of the planning application submission based on government/ industry guidance.
- Unless an equivalent technology/approach delivers a better outcome, demonstrate early engagement with infrastructure providers and ensure the provision of fibre to the premises (FTTP) infrastructure.
- For all applicable development: Mobile phone network capacity and improvements, to ensure that the likely impact of developments on the existing mobile networks in the area is assessed, and appropriate action taken, at an early stage. At present this will require 4G / 5G level technology. This is likely to evolve over the plan period and consideration of up-todate requirements will be made at the time of the planning application submission based on government/ industry guidance.
- Smart multifunctionality for all public realm street furniture, such as lampposts and signage.

Part G: Materials

DRAFT

All proposals must take into consideration the embodied carbon associated with materials using the RICS Whole Life Carbon approach or successor documents and incorporate measures into the development design, materials, construction and transportation methods etc. to reduce those emissions. Development must be designed to maximise resource efficiency and identify, source, and use environmentally and socially responsible materials, giving consideration to circular economy principles and design for deconstruction.

Part H: Minerals – Prior extraction

Proposals must be informed by a Minerals Resource Assessment (MRA), with evidence supplied in support of the scheme demonstrating how the scheme reflects and takes advantage of the opportunities afforded by prior extraction, as required by the Minerals Planning Authority. Given the scale of the Garden Community and duration of construction, the MRA can be undertaken in phases, but must be done ahead of any detailed masterplanning for that phase, such that the conclusions of the MRA can demonstrably influence the masterplan to ensure that minerals are not unnecessarily sterilised by non-mineral development.

Part I: Planning Application Requirements

1. All proposals must be accompanied by an 'Energy and Carbon Reduction Strategy' which considers all the measures set out in this policy and puts forward detailed solutions for the Councils approval, which will then be implemented as part of the development.
2. Proposals should include an assessment or measured confirmation of actual performance to address the performance gap between 'as designed' performance and 'as built' performance.
3. All proposals must be accompanied by a 'Digital Connectivity Report' demonstrating how the development will provide digital connectivity (including appropriate standards, timescales etc.) having regard to approved connectivity strategies applicable to the local planning authority areas.
4. All proposals must be accompanied by a 'Water Efficiency Calculator Report' to demonstrate compliance with the water efficiency target.
5. An Embodied Carbon Assessment using a recognised RICS tool should be submitted with all proposals.

END

DRAFT

Catherine Gardner

From: Rumble, John <john.rumble@affinitywater.co.uk>
Sent: 21 March 2024 13:36
To: Amy Lester
Cc: Pryor, Amy; Catherine Gardner; Tessa Saunders
Subject: RE: TCBGC Submission Version Development Plan Document (DPD)

Thanks Amy

Revised wording looks fine to me and happy to sign the SOCG. I have consulted some colleagues to see if we can place a threshold number on significant for you, so may come back on this one point if it comes through in the next day or so.

Thanks

John

John Rumble
Senior Asset Manager
Environmental Policy and Strategies Team
Asset Strategy and Capital Delivery Directorate

Affinity Water Ltd
Tamblin Way, Hatfield, Herts, AL10 9EZ
Mobile: 07890 061501

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From: Amy Lester <alester@tendringdc.gov.uk>
Sent: 25 January 2024 09:43
To: Rumble, John <john.rumble@affinitywater.co.uk>
Cc: Pryor, Amy <amy.pryor@affinitywater.co.uk>; Catherine Gardner <Catherine.Gardner@colchester.gov.uk>; Tessa Saunders <tSaunders3@anglianwater.co.uk>
Subject: FW: TCBGC Submission Version Development Plan Document (DPD)

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear John,

Thank you very much for coming back to my colleague Catherine who has forwarded me your email. Affinity Water have been helpfully engaging with ourselves throughout the plan making process for the Garden Community Development Plan Document (DPD) and have commented both at regulation 18 and regulation 19 stages. You can see Affinity Water's representations on the regulation 19 at the following link:

Tendring Colchester Borders Garden Community - Tendring Colchester Borders Garden Community Development Plan Document (DPD) (oc2.uk)

The Councils submitted the DPD for examination in September 2023 and one of the required submission documents was a *Strategic Policy Making Statement of Common Ground* (SoCG) which is a relatively new requirement. It sits alongside the Duty to Cooperate Statement and Consultation Statement and sets out a written record of progress made by strategic policy making authorities with strategic partners during the plan making process.

You will see in the regulation 19 response from yourselves that, (similar to Anglian Water) Affinity Water supported the positive messaging regarding the water efficiency opportunities in the DPD but requested a revision to require a lower level of water usage litres per day to reflect the exemplar development proposed. The *Strategic Policy Making SoCG* reflects this request at para.5.9.15 and goes on to note that a further SoCG will be prepared to resolve this matter.

We have therefore prepared further draft SoCG with Affinity Water, and a separate one with Anglian Water. These SoCG suggest a modification to the policy wording to reflect your request.

Please find attached the following:
- Strategic Policy Making SoCG
- Draft Affinity Water SoCG

Without completion of a SoCG to resolve the requested change from yourselves, we will have an unresolved objection from Affinity Water going into the DPD examination.

Please let me know if you would like me to provide any further clarity, I would be happy to arrange a short teams meeting if required and I have copied in Tessa Saunders at Anglian Water for information and to ensure consistency between all of the SoCG.

Kind regards,
Amy

From: Rumble, John <john.rumble@affinitywater.co.uk>
Sent: Tuesday, January 23, 2024 1:33 PM
To: Catherine Gardner <Catherine.Gardner@colchester.gov.uk>
Cc: Pryor, Amy <amy.pryor@affinitywater.co.uk>
Subject: RE: TCBGC Submission Version Development Plan Document (DPD)

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Hi Catherine

Key point for contact would be myself so you have reached the right person. Hannah Wilson left us before Christmas so apologies you should have got a response saying that she was no longer with Affinity Water.

In terms of you request I am happy to process it but not entirely sure why a SoCG is required or necessary, so if you have anything covering those two issues that could influence our decision on this that would be great. I would also need to know exactly what you would want the statement to cover as although we are not a statutory consultee Affinity water is happy to engage with the local planning authority on local plans etc just we have never seen the need for a SoCG to cover this.

Let me know if a discussion would help and I will put a teams invite in the diary.

Thanks

John

John Rumble
Senior Asset Manager
Environmental Policy and Strategies Team
Asset Strategy and Capital Delivery Directorate

_____

Affinity Water Ltd
Tamblin Way, Hatfield, Herts, AL10 9EZ
Mobile: 07890 061501

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From: Catherine Gardner <Catherine.Gardner@colchester.gov.uk>
Sent: 23 January 2024 13:20
To: Rumble, John <john.rumble@affinitywater.co.uk>
Cc: Wilson, Hannah <hannah.wilson@affinitywater.co.uk>
Subject: FW: TCBGC Submission Version Development Plan Document (DPD)

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Hi John,

I have been given your name as a contact but I'm not sure if you are the correct person to help me. I have emailed Hannah Wilson a few times as you can see below and have not had any response whatsoever from her. It may be that she has left the company.

Who would be the best person to deal with the strategic Statement of Common Ground (SoCG), (see email thread below for information).

If you could help in any way it would be appreciated, as this needs to be completed/signed soon.

I look forward to hearing from you.

Many thanks,

Catherine

Catherine Gardner
Programme Support Officer

Tendring Colchester Borders Garden Community Project:
Essex County Council, Colchester City Council and Tendring District Council

Email: catherine.gardner@colchester.gov.uk

From: Catherine Gardner
Sent: Tuesday, January 9, 2024 10:48 AM
To: hannah.wilson@affinitywater.co.uk
Subject: FW: TCBGC Submission Version Development Plan Document (DPD)
Importance: High

Hi Hannah,

I thought it would be helpful to send you the link to the strategic SoCG, please see below.

TCBGC DPD Strategic Policy Making SoCG for SIGNATORY REVIEW - 20102023.docx (sharepoint.com)

Many thanks,

Catherine

Catherine Gardner
Programme Support Officer

Tendring Colchester Borders Garden Community Project:
Essex County Council, Colchester City Council and Tendring District Council

Email: catherine.gardner@colchester.gov.uk

From: Catherine Gardner
Sent: Tuesday, January 9, 2024 10:33 AM
To: hannah.wilson@affinitywater.co.uk
Subject: FW: TCBGC Submission Version Development Plan Document (DPD)
Importance: High

Hi Hannah,

I haven't heard back from you following my last email and would like to get the SoCG signed. Are you the correct person to deal with this? If not, please let me know who I should be contacting to do so.

If you have any queries, or questions, please let me know.

If you could provide an update of where you are with the SoCG, it would be appreciated.

Many thanks,

Catherine

Catherine Gardner
Programme Support Officer

Tendring Colchester Borders Garden Community Project:
Essex County Council, Colchester City Council and Tendring District Council

Email: catherine.gardner@colchester.gov.uk

From: Catherine Gardner
Sent: Tuesday, December 12, 2023 12:32 PM
To: hannah.wilson@affinitywater.co.uk
Subject: Re: TCBGC Submission Version Development Plan Document (DPD)
Importance: High

Dear Hannah,

Just a gentle reminder that we have not received the signed SoCG to date. Could you please chase this up and provide an update, ideally, we would like to have it signed before Christmas if possible.

Many thanks,

Catherine

Catherine Gardner
Programme Support Officer

Tendring Colchester Borders Garden Community Project:
Essex County Council, Colchester City Council and Tendring District Council

Email: catherine.gardner@colchester.gov.uk

From: Catherine Gardner
Sent: Thursday, September 7, 2023 9:32 AM
To: 'hannah.wilson@affinitywater.co.uk' <hannah.wilson@affinitywater.co.uk>
Cc: TCB Garden Community <tcbgardencommunity@colchester.gov.uk>
Subject: Re: TCBGC Submission Version Development Plan Document (DPD)

Dear Hannah,

Tendring Colchester Borders Garden Community

I write with regard to the TCBGC Submission Version Development Plan Document (DPD). Thank you for your representation submitted during our recent Regulation 19 Consultation. The Councils are shortly intending to submit the plan to the Planning Inspectorate and are in the process of finalising the accompanying submission documents. This includes a plan making strategic Statement of Common Ground (SoCG).

The SoCG has been prepared in support of the DPD in accordance with the National Planning Policy Framework 2021 (NPPF). It sets out a written record of progress made by the strategic policy making authorities with strategic partners during plan making for cross-boundary strategic planning through the TCBGC DPD. As an identified Strategic Partner, Affinity Water has been identified as a signatory. It should be noted that this strategic SoCG does not replace individual SoCGs, and it remains the Councils intention to engage further in the preparation of a SoCG with yourselves prior to the Examination in Public (EiP).

The SoCG will be issued shortly, and I would be grateful if you could advise who would be the signatory on behalf of Affinity Water.

Many thanks,

Catherine

Catherine Gardner
Programme Support Officer

Tendring Colchester Borders Garden Community Project:
Essex County Council, Colchester City Council and Tendring District Council

Email: catherine.gardner@colchester.gov.uk

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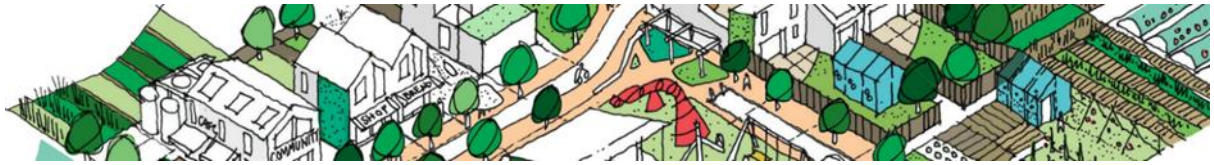

Statement of Common Ground with Health Bodies

NHS Suffolk & North East Essex Integrated Care Board (SNEE ICB)

East Suffolk & North Essex NHS Foundation Trust (ESNEFT)

East of England Ambulance Service NHS Trust (EEAST)

Tendring Colchester Borders Garden Community

Development Plan Document – Submission Version

DRAFT April 2024

Tendring District Council

Colchester City Council

Essex County Council

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 the following Health Bodies:

- NHS Suffolk & North East Essex Integrated Care Board (SNEE ICB)
- East Suffolk & North Essex NHS Foundation Trust (ESNEFT)
- East of England Ambulance Service NHS Trust (EEAST),

to the Tendring Colchester Borders Garden Community (TCBGC) submission version Development Plan Document (DPD).

Those health bodies outlined above 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 the Health Bodies, 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.

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: TCBGC Planning Manager

On behalf of the NHS Suffolk & North East Essex Integrated Care Board (SNEE ICB),
Name:
Role:

On behalf of the East Suffolk & North Essex NHS Foundation Trust (ESNEFT)
Name:

DRAFT

Role:

On Behalf of the East of England Ambulance Service NHS Trust (EEAST)
Name:
Role:

3. SUMMARY OF AGREED POSITION

The Health Bodies have 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 the representations and the agreement reached between the Councils and the Health Bodies.

4. UNRESOLVED ISSUES

A number of minor unresolved issues remain where they relate to:

- Suggested modifications to policy text which the Councils consider to be repetitious,
- Inclusion of a further monitoring indicator relating to NHS waiting times. And
- A requirement for an emergency services strategy as a validation requirement.

Full details of these un-resolved issues are outlined in the table at section 6.

5. SIGNATURES

The Councils, the SNEE ICB, the ESNEFT and the EEAST confirm that this SoCG reflects the joint working by the organisations to address identified matters.

Signed on behalf of the Councils by:
Name: Amy Lester

DRAFT

Position: Garden Community Planning Manager Date: 26.04.2024
Signed on behalf of SNEE ICB by:
Name: Position: Date:
Signed on behalf of the ESNEFT by:
Name: Position: Date:
Signed on behalf of EEAST by:
Name: Position: Date:

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6. TABLE OF REPS/COMMENTS

Reps From ESNEFT	Policy and Part	Councils Response	Proposed Change	Health Bodies Response	Agreed?
Rep ID.266 Chapter 2 - Vision	Narrative				
Amendments request to text to ensure consistent approach. To ensure alignment with the NPPF, which identifies health facilities as those be included under the overall umbrella of 'community facilities', and to ensure the Plan meets its requirement to provide for the community's health in an effective way, it is considered that specific reference to healthcare facilities should be included within the draft Plan's Vision (page 16: Community Facilities).		Comment Noted.	Amend Chapter 2, page 16, Community and Social Infrastructure, to read: "The Garden Community will be known for its healthy and happy community. It will have a variety of diverse community spaces, play spaces, great local schools and a network of sport, leisure *and health facilities*. It will establish long term and participative stewardship of infrastructure from the outset."	NEE Alliance Comment: "The Garden Community will be known for its healthy and thriving community. It will have a variety of diverse community spaces, play spaces, great local schools and a network of sport, leisure, *health and wellbeing facilities*. It will establish long term and participative stewardship of infrastructure from the outset." LPA response: Suggested wording as amended above agreed.	Yes
Rep ID.266 GC Policy 1 – Land Uses and Spatial Approach	Part A				
General Healthcare Reference To ensure the Plan includes an effective strategy for securing identified infrastructure needs, we request that the wording of the first bullet point of Policy 1, Part A: Land Use Parameters and Policies Map, be amended to refer to healthcare.		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 1, Part A, first bullet to read: "Delivery of circa 7,500 new homes with a range of shops, jobs, services and community facilities, including education *and healthcare provision* (see Part B below)."	NEE Alliance Comment: "Delivery of circa 7,500 new homes with a range of shops, jobs, services and community facilities, including education *and health and wellbeing provision* (see Part B below)." LPA response: Suggested wording as amended above agreed.	Yes
Rep ID.266 GC Policy 1 – Land Uses and Spatial Approach	Part B				
Crockleford Neighbourhood		Comment Noted. The policy is considered sound, however, upon	Amend GC Policy 1, Part B to read:	NEE Alliance Comment:	Yes

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With regard to the proposals for 'Crockleford Neighbourhood', to ensure that the Policy represents an effective strategy for meeting identified infrastructure needs, we request that the wording of this section of Part B be amended to refer to healthcare facilities to read as follows: *"Accessibility to services and facilities including health care, utilities infrastructure and the Rapid Transit System will be key to determining the phasing of development in the 'Crockleford Neighbourhood'."* As per our comments above on the South and North Neighbourhoods, the capacity of existing facilities and services to meet the needs arising from the proposed development will inform the accessibility of these to Crockleford Neighbourhood's residents.		further assessment the Councils consider that a proposed change to the DPD could be appropriate.	"Accessibility to services and facilities *<u>including health care</u>*, utilities infrastructure and the Rapid Transit System will be key to determining the phasing of development in the 'Crockleford Neighbourhood'."	"Accessibility to services and facilities *<u>including those that support health and wellbeing</u>*, utilities infrastructure and the Rapid Transit System will be key to determining the phasing of development in the 'Crockleford Neighbourhood'." LPA response: Suggested wording as amended above agreed.	
Rep ID.266 GC Policy 1 – Land Uses and Spatial Approach	Part K				
Minor Typo There is a minor typographical error at the end of Part K, where reference to Appendix 4 should be Appendix 3.		Noted and amendment suggested as detailed in Schedule of Modifications.	n/a	ESNEFT Comment: Agreed	Yes
Rep ID.267 GC Policy 6 – Community and Social Infrastructure	Narrative				
Amendments requested to text to ensure consistent approach. Amendment sought to Para.1 page 78 to include healthcare as a required community facility. Amendment sought to Bullet Point 3 page 78 to reference secondary and acute healthcare.		Comment Noted on Para.1. For consistency the Councils consider that a proposed change to the DPD could be appropriate. Comment Noted on Bullet Point 3. This wording is consistent with the adopted Section 1 Plan which has been previously found sound and as such any	Amend Para.1 page 78 to read: "ensuring the Garden Community is served by community services and facilities of the right type in the right location, including *<u>healthcare</u>*, schools and sports facilities; ~~as well as access to health services~~ …"	NEE Alliance Comment: Ensuring the Garden Community is served by community services and facilities of the right type in the right location and delivered at the appropriate time, including *<u>health and wellbeing</u>*, schools and sports facilities; ~~as well as access to health services~~ …"	Yes

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		further amendment would be inappropriate.		LPA response: Suggested wording as amended above agreed.	
Rep ID.267 GC Policy 6 – Community and Social Infrastructure	Policy Intro.				
Infrastructure provision To ensure that it is clear that mitigation of the development's impacts may take the form of off-site infrastructure provision, and that the Policy represents an effective strategy, we request that the following sentence is added at the start of the Policy wording: *"The Garden Community will require all developments to provide for the on and off-site infrastructure necessary to support the development and mitigate its impacts. The Garden Community will deliver local community services and facilities …"*		Comment Noted. The policy is considered sound and further amendment is not needed. The requirement to provide on and off-site infrastructure is addressed by GC Policy 9 and repetition is not required.	n/a	NEE Alliance Comment: This is an important point as will impact on the timing of any health, wellbeing or care facilities on-site. Capacity would have to be met in existing facilities before any new provision would be provided on-site and this needs to be very clear. LPA response: The Councils have reconsidered this point and maintain that further amendment is not required. Planning policies should avoid repetition and the NPPF states that plans should avoid duplication of policies.	
Rep ID.267 GC Policy 6 – Community and Social Infrastructure	Part E				
Healthcare Infrastructure To ensure that the Policy represents an effective strategy for securing all types of healthcare infrastructure (both on and off-site) required to serve the new communities, and is consistent with Policy 9, amendments are requested to Part E: Health.		Comment Noted. The policy is considered sound, however, upon further assessment the Councils consider that a proposed change to the DPD could be appropriate. Reference to the method of securing on and off-site infrastructure is addressed by GC Policy 9 and repetition is not required.	~~Amend GC Policy 6, Part E to read:~~ ~~… Appropriate health and wellbeing services must be provided to new residents and occupiers of the Garden Community from first occupation. Proposals for the development of the Garden Community must *reflect national and local health related strategies, consider the outcomes from relevant Health Impact Assessments and align with an overall 'Health Strategy' for the Garden Community, and are anticipated to* include:~~	NEE Alliance Comment: Although we acknowledge the statement says could, we think that this section has the potential to raise significant expectation if what will be delivered. At this time, there is no agreement to provide a health and wellbeing hub. If an agreement was to be made, this would not be delivered in the early phase (see above comments). Caution needs to be made around naming health care professionals as primary care delivery is significantly changing and in NEE we have difficulty	Yes

DRAFT

			~~• *Enhancements to existing facilities, including improvements to healthcare services and facilities at Colchester Hospital to support the provision of acute and secondary care.*~~ ~~• A new Health and Wellbeing Hub to be provided in the early phases of development (potentially via a phased approach to delivery). The facility shall be designed to deliver an integrated service for patients *considering the need for* including a cluster of general practitioners, a wide range of diagnostic services and primary care treatment – to minimise the requirement for secondary care treatment at hospital. It ; and *it* should be located on an accessible site close to other community facilities.~~ ~~• Flexible space for health provision, located within the Neighbourhood Centres and community buildings.~~ ~~Developers should enter into early conversations with the local NHS Integrated Care Board, the North East Essex Health and Wellbeing Alliance, and other relevant partners to ensure that proposals reflect current health and social care models.~~ ~~Amend GC Policy 6, Part G to read:~~ ~~3. Proposals must be supported by bespoke demographic studies commissioned by the developer to provide a consistent evidence base for the planning of all social and community infrastructure, particularly schools *and healthcare facilities.*~~ Amend GC Policy 6, Part E to read:	recruiting general practitioners and expectation should not be set that this can be achieved. Diagnostics are provided by secondary and community providers and again, agreement would need to be made including nay financial planning for this, so clarity is needed on the delivery of this. We are unclear as to what funds are coming from the GC, no clarity has been given on potential resident demographic and no health impact assessment has been provided even though multiple requests have been made. An HIA would have enabled us to address all the issues in the SOCG and until this is provided, these issues are likely to continue to be unaddressed. LPA response: The Councils are sympathetic to the capacity demands and ability of the NEE to commit to the provision of facilities to meet the long-term needs of future communities. An HIA assessment, health strategy, population demographics and infrastructure funding will be determined during the pre-application and application process. At the plan making stage, we do not yet have a proposal to assess and consider. There is no statutory requirement for an HIA to be prepared at this stage and no proposed development or phasing plan upon which to base one, its scope therefore would be extremely limited.	

DRAFT

			… Appropriate health and wellbeing services must be provided to new residents and occupiers of the Garden Community from first occupation. Proposals for the development of the Garden Community must *reflect national and local health related strategies, consider the evidence provided through relevant Health Impact Assessments including the joint strategic needs assessment (JSNA) and align with the outcomes within the overall 'Health Strategy' for the Garden Community, and are anticipated to* include: *• Enhancements to existing local facilities, including improvements to primary care provision and wider healthcare services and facilities including but not limited to those at Colchester Hospital which will support the provision of acute and community services.* • A new Health and Wellbeing Hub (underpinned by the most up-to date evidence base delivered via a phased approach). The facility shall be designed to deliver an integrated service for residents and include consideration of primary, community and acute services and should be located on an accessible site close to other community facilities and transport infrastructure. Any approach to health and wellbeing will include facilities that provide regard to prevention and health improvement activities. • Flexible space for health provision, located within the Neighbourhood Centres and community buildings. Developers must enter into early conversations with the local NHS Integrated Care Board through the North	The removal of reference to healthcare and wellbeing facilities in a policy document will significantly restrict the ability for future negotiations to secure services or funding to meet the demands of a future development. The policy wording as proposed is considered to be as flexible as possible to allow future negotiations as to service provision and delivery. There is concern as to the likely political and public perception of a policy document for a strategic new community, which would not make reference in some form to healthcare and wellbeing provision to meet the needs of future residents. The ability to secure funding for future infrastructure, be that on or off site, can only be achieved by making reference to it at this stage. The Councils are committed to future engagement with the Alliance throughout future pre-application discussions and application determination, including planning obligation requirements. Amended Wording AGREED	

DRAFT

			East Essex Health and Wellbeing Alliance which is the local place-based health partnership so to ensure that proposals reflect current health and social care models, local evidence and need. This partnership vehicle will also be key in supporting the development of the health impact assessment and health strategy for the GC. Amend GC Policy 6, Part G to read: 3. Proposals must be supported by bespoke demographic studies commissioned by the developer to provide a consistent evidence base for the planning of all social and community infrastructure, particularly schools *and healthcare facilities. These will also contribute to the health impact assessment.*		
Rep ID. 267 GC Policy 9 – Infrastructure Delivery and Impact Mitigation	Justification				
Minor Addition To ensure that developers liaise with the most appropriate NHS contacts to discuss and agree the scope and scale of the healthcare infrastructure and/ or funding required to meet the new community's needs, it is requested that the **Integrated Care Board (ICB)** is added to the list of partners with which the Council will work to bring forward the necessary infrastructure that is required to deliver the Garden Community.		Comment Noted.	Amend Para.1 (under Justification), page 129 to include: *Integrated Care Board (ICB)*		Yes
Rep ID. 267 Glossary	Glossary				
Minor Addition		Comment Noted.	Amend Glossary, page 147 to read:	ESNEFT Comment:	Yes

DRAFT

Reference should be made to **emergency, and acute inpatient and outpatient facilities**.			**Community Facilities** Are buildings, which enable a variety of local activity to take place including, but not limited to, the following: Schools, Universities and other educational facilities; Libraries and community centres; Doctors surgeries, medical centres and hospitals, *including emergency, and acute inpatient and outpatient facilities;* Public houses and local shops; Museums and art galleries; Child care centres; Sport and recreational facilities; Youth clubs; Playgrounds; Cemeteries; and Places of worship.	Agreed	
Rep ID.268 Sustainability Appraisal					
Objective 3 Note that the appraisal questions for SA Objective 3 (pages 76 and 77) have been expanded to include "Will it ensure access to and prevent overburdening of health facilities, including primary, acute and emergency services, including through the provision of new infrastructure of this type?", which is welcomed. In order to secure a fully effective strategy for mitigating the healthcare impacts arising from the development, we request that the appraisal question is amended further to refer to both on- and off-site facilities, as follows: *"… including through the provision of new on- and off-site infrastructure of this type?"* --- **Objective 3** Representations dated 25th April 2022 to the consultation on the previous draft of the Sustainability Appraisal (February 2022)		Comments noted. The SA Framework has included indicators that are considered appropriate and reasonable for the Councils to monitor. Although the wording suggested by the reg.18 rep was not included in the appraisal questions of the SA framework for SA objective 3, it considered that this has been adequately and appropriately addressed. The SA report notes that Policy 6 of the DPD seeks to create neighbourhoods with local centres that include a diverse range of uses, including community and healthcare space in addition to an inclusive public realm that is safe and connects the community with the natural environment. Additionally, proposals must include a new Health Centre, flexible space for health provision and enhancements to existing facilities, including those in locally accessible locations. As such, the needs of the new residents of the Garden	N/A	ESNEFT Comment: Until it is known whether the requested amendments are to be supported by the Councils, ESNEFT would not be in a position to confirm that it is content with the SoCG --- LPA response: A review of the Monitoring Indicators has taken place where consideration has been given to an additional indicator as suggested by the representation. A suggested modification has not been made as the indicator would be a measurement of the operation of the hospital/health hub rather than the success of the GC.	

DRAFT

raised the need to expand the proposed monitoring indicators for SA Objective 3. As this has not been addressed, we wish to reiterate our request for the following amendments to be made. It is necessary to recognise that access to healthcare is predicated not only on the distance of new residential development to an appropriate facility, but also on the service capacity of those facilities to absorb the new demand. A key factor to delivering healthcare without delay is the availability of bed spaces to ensure patient flow through the hospital. The key level of bed provision should support maximum bed occupancy of 85%. This occupancy rate is evidenced to result in better care for patients and better outcomes. The 'new' residents of the Garden Community will create additional demands on the Trust's services. A further healthcare indicator to cross refer to relates to the length of waiting time for patient appointments, which may apply to both acute inpatient and outpatient services located in either a hospital or health hub within the Garden Community development itself. It is, therefore, requested again that the SA Objective additionally refers to the general acute healthcare indicators discussed above.		Community should be met through new healthcare facilities. The SA also notes that Policy 9: Infrastructure Delivery and Impact Mitigation of the DPD requires proposals for the Garden Community to demonstrate that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered in a timely and, where appropriate, phased manner by the proposal. It is accepted that in the short term there may be additional pressure placed on existing healthcare facilities should the phasing of new provision lag behind the occupation of new housing.			
Reps From EEAST	**Policy and Part**	**Councils Response**	**Proposed Change**	**Health Bodies Response**	**Agreed?**
Rep ID.253 GC Policy 1 – Land Uses and Spatial Approach	Part B				
Omission of Emergency Services		Comment Noted. The policy is considered sound, however, upon further assessment the Councils	Amend GC Policy 1, Part B, page 22, 5th Para. to read:	EEAST Comment: Agreed	**Yes**

DRAFT

Part B of the policy (page 22) omits reference to key social infrastructure in the form of emergency services (incorporating ambulance, police & firefighting facilities).		consider that a proposed change to the DPD could be appropriate.	"….The councils will work with the University of Essex and other partners as appropriate, to deliver the key infrastructure (health, education, *ambulance, police, firefighting* and other community uses)…."		
Rep ID.254 GC Policy 6 – Community and Social Infrastructure	Narrative				
Omission of Emergency Services Para.1 page 78 omits reference to key social infrastructure in the form of emergency services (incorporating ambulance, police & firefighting facilities).		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 6, Para.1 page 78 to read: "ensuring the Garden Community is served by community services and facilities of the right type in the right location, including *healthcare*, schools and sports facilities; as well as access to health *ambulance, police and firefighting* services …"	EEAST Comment: Agreed	**Yes**
Rep ID.255 GC Policy 6 – Community and Social Infrastructure	Policy Text				
Omission of Emergency Services Policy omits reference to key social infrastructure in the form of emergency services (incorporating ambulance, police & firefighting facilities). New 'Part' to policy requested after Part E to be 'Emergency Services'. Recommended Text: *Part F: Emergency Services* *The Garden Community will promote community safety and cohesion by providing for an appropriate level of ambulance, police and firefighting facilities to serve the needs of each neighbourhood and its residents, with the phasing of facilities to be set out in*		Comment Noted. The policy is considered sound and further amendment is not required. The requirement to provide emergency services infrastructure is appropriately addressed by GC Policy 6 and GC Policy 9 though the inclusion of wording as suggested elsewhere and repetition is not required.		EEAST Comment: Not Agreed EEAST set out its requirements for infrastructure/ facilities provision & funding at the DPD Regulation 18 stage liaising with the Council's consultants over the period April – August 2022 & updated its evidence at the DPD Regulation 19 stage in June 2023, in line with NPPF Paragraph 16 advice for plans to be shaped by early, proportionate & effective engagement between plan makers & infrastructure providers. It is further noted that the legislative basis for infrastructure to support planned growth - in the form of	

DRAFT

the Infrastructure Delivery, Phasing & Funding Plan. *Developers should enter into early discussions with the East of England Ambulance Service NHS Trust (EEAST), Essex Police and Essex Fire & Rescue to identify the physical and social infrastructure and facilities funding required, along with a strategy for phased implementation.*				medical facilities & facilities & equipment for emergency & rescue services is clearly recognised in the Planning Act 2008 & the Levelling-up & Regeneration Act 2023. In order for the landowners & developers to undertake effective cost & revenue calculations & related financial viability work to develop implementation plans to inform the phased delivery of the masterplanned new community, it is considered necessary for the community & social infrastructure policy (GC Policy 6: Community & Social Infrastructure) to provide clarity on all the key social infrastructure to be provided & funded by the developers. Early (pre-application) liaison with EEAST & its health & blue light partners is therefore necessary & a statutory policy basis (in addition to a supporting text reference) is therefore necessary, in order to ensure a policy compliant approach to this area of key social infrastructure provision. The strategic growth of circa 7,500 homes (17,250 population) would have a substantial impact on EEAST's operational capacity requiring significant mitigation in the form of developer funding for estate, vehicle fleet & staff assets (which ought to be reflected in an IDP update now for consideration at the Examination Stage) & omission to include a direct reference to EEAST's need for ambulance infrastructure/ facilities in Policy GC 6, with only a generic reference to 'infrastructure' in Policy GC9 is not considered to be sufficient.	

DRAFT

				The current approach is not considered to an appropriate strategy taking into account EEAST's evidence & is therefore not 'justified' & as a consequence 'unsound'. EEAST would welcome further consideration to its preferred policy wording as set out in the Regulation 19 representations, or a similar approach to be discussed. LPA response: The Councils have reconsidered this point and maintain that further amendment is not required. Planning policies should avoid repetition and the NPPF states that plans should avoid duplication of policies.	
Rep ID.256 GC Policy 6 – Community and Social Infrastructure	Justification				
Justification Text: Para 1, Page 86. Plan text not fully 'justified' as the paragraph omits reference to key infrastructure in the form of ambulance, police & firefighting facilities.		Comment Noted. The policy is considered sound and further amendment is not required. The wording is not a definitive list of all services which fall under 'community and social infrastructure'. The addition of wording as suggested under rep.257 and rep.263 is a more appropriate location to insert references to emergency services.		EEAST Comment: Not Agreed. EEAST's justification for the requested change is outlined at the response to Rep ID 255 above. LPA response: As above.	
Rep ID.257 GC Policy 6 – Community and Social Infrastructure	Justification				
Justification Text: Para 2, Page 86. Plan text not fully 'justified' as the paragraph omits reference to key infrastructure in the form of ambulance, police & firefighting facilities.		Comment Noted. The policy is considered sound, however, upon further assessment the Councils	Amend Justification Text: Para 2, Page 86 to read:	EEAST Comment: Agreed	**Yes**

DRAFT

		consider that a proposed change to the DPD could be appropriate.	"Community and social infrastructure covers a wide range of facilities, such as health; *ambulance; police; firefighting*; education; sports; recreation and greenspace; places of worship; community halls; public houses and cultural infrastructure..."		
Rep ID.258 GC Policy 9 – Infrastructure Delivery and Impact Mitigation	Narrative				
Narrative Text: Para 1, Page 127. Plan text not fully 'justified' as the paragraph omits reference to the basis for key infrastructure in the form of ambulance, police & firefighting facilities.		Comment Noted. The narrative text to which this section refers relates to the adopted polices of the Section 1 Plan and therefore this wording cannot be changed.		EEAST Comment: Not Agreed One of the purposes of the DPD & related IDP is to refine & update the broad policy & infrastructure assumptions associated with the evidence gathering & plan making process linked to the North Essex Authorities' Shared Strategic Section 1 Plan, January 2021. Policy SP9 requires the DPD to be produced in consultation with stakeholders (ie including infrastructure providers) together with a phasing & implementation strategy which sets out how the rate of development will be linked to the provision of the necessary social, physical & environmental infrastructure, which would include ambulance facilities. It is acknowledged that the Section 1 Plan provides an overarching framework for the DPD, however NPPF Paragraph 31 requires the preparation and review of all policies to be underpinned by relevant & up to date evidence, & reference to key social infrastructure requirements ought not to be omitted as it is necessary to provide for safe,	

DRAFT

				cohesive & sustainable new communities. If considered necessary, a minor change could be made to the first paragraph on page 127 as follows: "The main requirements covered in this Plan, as set out in the policies of the adopted Section 1 Local Plan & as subsequently updated by stakeholder evidence include:" --- LPA response: The Councils have given careful consideration to the implications of this suggested change and the reference to the NPPF is acknowledged. However, the approach proposed would be inconsistent with the approach to every other policy introduction. Reference to the emergency services has not been excluded from Chapter 10 as it has been added into the justification text on page 129 as noted in re ID response 259 below.	
Rep ID.259 GC Policy 9 – Infrastructure Delivery and Impact Mitigation	Justification				
Justification Text: Para 1, Page 129. Plan text not fully 'justified' as paragraph omits reference to key infrastructure in the form of ambulance, police & firefighting facilities		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 Justification Text: Para 1, Page 129 to read: "The Garden community will require the provision of new physical infrastructure such as footways, cycleways, roads, and sewers; social infrastructure such as health, *ambulance, police, firefighting,* education and community facilities, and green infrastructure such as open and recreational spaces."	EEAST Comment: Agreed	**Yes**

DRAFT

Rep ID.260 GC Policy 9 – Infrastructure Delivery and Impact Mitigation	Justification				
Justification Text: Para 1, Page 131. Plan text not fully 'justified' as paragraph omits reference to key infrastructure in the form of ambulance, police & firefighting facilities.		Comment Noted. The policy is considered sound and further amendment is not required. The justification text in this instance relates to the method of funding infrastructure in accordance with 'The Community Infrastructure Regulations 2019', rather than providing a definitive list of infrastructure required. Further amendment is not considered appropriate or required as this has been appropriately addressed elsewhere in amendments to both policy and justification test.		EEAST Comment: Agreed	**Yes**
Rep ID.261 Appendix 1	Appendix 1				
Appendix 1. Principles & Objectives: Community & Social Infrastructure subheading 'a Place where it's easy to be healthy & happy' (Page 138). Plan text not fully 'justified' as it omits reference to key infrastructure in the form of ambulance, police & firefighting facilities.		Comment Noted. The policy is considered sound and further amendment is not required. The inclusion of 'ambulance, police & firefighting facilities' in the sentence as proposed would be out of context given that it is referring to public accessibility to services by all modes of transport, rather than the provision of infrastructure.		EEAST Comment: Agreed	**Yes**
Rep ID.262 Appendix 3	Appendix 3				
Appendix 3: Planning Application/ Validation Requirements (Page 145). Validation list not fully 'justified' as it omits reference to key infrastructure in the form of ambulance, police & firefighting facilities.		Comment Noted. The policy is considered sound and further amendment is not required. The requirement for a specific strategy to cover emergency services would be onerous and not proportionate.		EEAST Comment: Not Agreed The provision of key social/ physical infrastructure in the form of ambulance, police & firefighting facilities is considered essential to the	

DRAFT

Request that a 'Strategy for addressing the requirement for ambulance, police, & firefighting infrastructure & facilities' be included in the Validation Requirements.		Strategies for emergency service provision and design would be effectively addressed through other documents such as Design & Access Statements, Planning Obligation Statement, Health Impact Assessment, Health Strategy, and Transport/Parking Assessments. They would also be effectively secured through planning obligations and conditions.		creation of safe, cohesive & sustainable new communities. The level of infrastructure/ facilities required for each housing phase would need to be scoped in advance with EEAST, Essex Police & Essex Fire & Rescue at the pre-application stage, & once agreed, could be reflected in the Applicant's Section 106 Heads of Terms of Agreement & delivered via a planning obligation or CIL/IL in due course, as appropriate. If there is no validation requirement to scope this necessary infrastructure at the outset, there would be no effective mechanism for ensuring that it is included in the planning application - which would potentially delay the planning application processes & be inconsistent with the approach taken to other key social infrastructure providers. The strategy for addressing the requirement for ambulance, police & firefighting infrastructure/ facilities would not be onerous & would be proportionate in the context of the substantial service impacts arising through delivery of the strategic scale Garden Community. LPA response: No further response.	
Rep ID.263 Glossary	Glossary				
Reference to Infrastructure (Page 149). The Glossary list not fully 'justified' as it omits reference to key infrastructure in the		Comment Noted. The policy is considered sound and the text notes that the wording is not a definitive list of all services which fall under	Amend Glossary Text: Infrastructure, Page 149 to read:	EEAST Comment: Agreed	**Yes**

DRAFT

form of ambulance, police & firefighting facilities.		'Infrastructure'. However, upon further assessment the Councils consider that a proposed change to the Glossary wording could be appropriate to incorporate suggested inclusion of emergency services.	Infrastructure means any structure, building, system, facility and/or provision required by an area for its social and/or economic function and/ or well-being including (but not exclusively): footways, cycleways and highways; public transport; drainage and flood protection; waste recycling facilities; education and childcare; healthcare; *ambulance, police & firefighting facilities;* sports, leisure and recreation facilities; community and social facilities; cultural facilities; emergency services; green infrastructure; open space; affordable housing; broadband; facilities for specific sections of the community such as youth or the elderly.		
Rep ID.264 Infrastructure Delivery Phasing & Funding Plan (IDP)	Evidence Base				
Request made to update the 2023 IDP evidence base document (Examination Document ref. EB17 TCBGC Infrastructure Delivery Phasing Funding Plan) to incorporate ambulance infrastructure/facilities and delivery requirements.		Comment noted. The Infrastructure Delivery Phasing & Funding Plan (IDP) February 2023 will need to be monitored, reviewed and updated as the policy framework evolves over time (at both local and national levels), and as planning applications come forward. The actual scope and scale of infrastructure requirements will be subject to change as a result of more detailed consideration of specific proposals and their impacts, changes in the wider context and ways of living, and potential changes to plans/strategies or priorities provided by infrastructure providers, including the EEAST. The schedule of infrastructure requirements is therefore treated as 'live' to be updated regularly and monitored over time. The further information provided by way of Rep ID.264 will inform the next annual update to the IDP and will feed into on-		EEAST Comment: Not Agreed If a full update is not planned then EEAST request that an IDP 'Addendum' is prepared to reflect the infrastructure/ facilities required by EEAST to mitigate the impact of the Garden Community on its service capacity, & to inform the financial viability & masterplanning work at an early stage. From the landowners & developers' perspective it is considered essential that EEAST's IDP evidence is considered as part of the Examination process, for the reasons outlined at Rep ID 255 above. LPA response: No further response.	

DRAFT

		going pre-application discussions and developer engagement.			
Reps From SNEE ICB	**Policy and Part**	**Councils Response**	**Proposed Change**	**Health Bodies Response**	**Agreed?**
Rep ID.272 and 273 GC Policy 6 – Community and Social Infrastructure	Policy text and Justification				
Stresses the importance of the need for a robust HIA process developed through collaborative work and carried out as early as possible. Highlight that due to the duration of the build that a single health impact assessment will not be acceptable in being able to address changing health impact on our population. Discussion on the timing of infrastructure will need to be discussed in depth as to the appropriate timing of this, type of infrastructure, value for money and be evidence based through the HIA process. The SNEE ICB rep recommends further wording be included in the chapter.		Comment Noted. The policy is considered sound and sufficiently robust to ensure that developers enter into early discussions with the relevant partners which is being facilitated through the pre-application process. Part E of Policy GC6 requires that **'each'** planning application must be supported by an HIA. This is carried forward into Part G of Policy GC 6 which details Planning Application Requirements and Appendix 3 which details Validation Requirement documents. This is considered sufficient to ensure that HIAs are regularly submitted, updated and appropriately respond to evidenced need throughout the duration of the development. Upon further assessment the Councils consider that a proposed change to the justification text of Policy GC 6 could be appropriate to incorporate suggested wording.	Amend Justification Text: Insertion of new paragraph after Para 3, Page 88 to read: *The health strategy for the Tendring Colchester Borders Garden Community will be dependent on various factors including capacity in existing neighbouring primary care facilities, workforce recruitment, funding streams, NHS clinical and service strategies and NHS building design approaches. A comprehensive, evidence based HIA will be carried out engaging with all local health and care partners and local communities to ensure that a robust view of need is assessed. The strategy shall be designed to ensure that health is designed into the Garden Community and that any new infrastructure delivers an integrated service for the population. A consideration on the wider impact of the development on key health stakeholders including Public Health, primary, secondary and acute inpatient and outpatient facilities, ambulance, police, firefighting and others within the local partnership will need to be taken into account and mitigation of any impact appropriately provided.*	NEE Comment: Our comments on HIA are unchanged. The timing of a health strategy is questioned as this would have enabled us to set the parameters around this development. Best practice suggests that this strategy and HIA should have been carried out prior to the masterplanning process so that this can influence the proposal. This has been a continuous message in our responses. LPA response: The SNEE ICB regulation 19 representation stresses the importance of an HIA being carried out as early as possible (from masterplanning). Whilst a Strategic Framework Masterplan has been prepared by the Councils to support the DPD as part of its evidence base, this is illustrative only and the DPD itself requires the applicant/developer to carry out extensive masterplanning work which would be developed and supported by the development of an HIA by the developer in collaboration with the Alliance.	

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				There is no statutory requirement for an HIA to have been carried out at the current plan making stage.	

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