## GC Policy 7. Movement and Connections

# RE7

## Support

**Summary of representations:**

The design of cycling infrastructure should consider the need to reduce conflict between pedestrians and cyclists.
Provision should be included for A120 access from Bromley Road, either via the Garden Community or via a new junction, to reduce congestion at the busy and complex A133 junctions in East Colchester.
The RTS should form a loop to provide quick access from the Garden Community to the Northern Gateway and Colchester Business Park via the A120.
Long term, Ardleigh train station should be rebuilt to give residents of the Garden Community better access to the rail network than Hythe can provide.

**Summary of representation changes to plan:**

None

**Response:**

Support Noted

**Action:**

None

### 6

**Respondent:** Mr Kieran Franklin [22]

**Change suggested by respondent:**

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**Attachments:** None

## Support

**Summary of representations:**

I am very much in favour of the new road linking the area to the A133 as a matter of urgency, not being pushed into the background. This could be such a boon to locals around here. The fact that it would clear jams on Clingoe Hill and divert traffic from the Colchester circuits for those going South or North suggest that Essex Highways and Colchester Borough should be funding it rather than the developers. There have been local pleas that public transport could and should benefit, too.

**Summary of representation changes to plan:**

None

**Response:**

Support Noted

**Action:**

None

## 15

**Respondent:** Mr Bryan Thomas [38]

**Change suggested by respondent:**

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**Attachments:** None

# Support

**Summary of representations:**

The policy is supported for the reasons set out in the full comments.

**Summary of representation changes to plan:**

None

**Response:**

Support Noted

**Action:**

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

## 70

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

**Change suggested by respondent:**

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**Attachments:** None

# Support

**Summary of representations:**

ECC as the highway and transportation authority, supports Chapter 8: Movement and Connections, which seeks to create high quality sustainable connections and an environment that make walking, cycling and public transport the most attractive method of travel. ECC has worked closely with Colchester City and Tendring District Councils to develop a place-based approach to achieving net zero carbon transport by 2050 for the Garden Community. The Draft Plan is in line and consistent with the current Essex Transport Strategy: the Local Transport Plan for Essex (LTP3).

**Summary of representation changes to plan:**

None

**Response:**

Support Noted

**Action:**

None

## 109

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

**Change suggested by respondent:**

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**Attachments:** None

# Support

**Summary of representations:**

As a regular cyclist, I approve the plans for cycling provision if they are as described. Compromises would diminish their success. The design of the homes needs to accommodate multiple bikes in each household and hubs for cycle repairs and servicing would help sustained use. Safe and easy access to cycle routes outside the GC, e.g. the Colchester Orbital is important. Easy routes to locations such as the city centre, hospital, coast, railway and libraries are needed.

**Summary of representation changes to plan:**

None

**Response:**

Support Noted

**Action:**

None

## 129

**Respondent:** Mrs Sarah Chandler [93]

**Change suggested by respondent:**

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**Attachments:** None

# Object

**Summary of representations:**

The transport system is all pie in the sky, and a complete waste of money. As the new development is out of town most residents will use their own cars.
People do not and will not rely of public bus services as they are far to expensive, unreliable and also people like the comfort of their own vehicles.
Killing wild life and their habitat to build a "rapid transport system" is a disgrace, and i for one don't wish to fund a bus service that will carry about 5 people per bus.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery. The principle of development has been established by way of the adopted Section 1 Local Plan. The DPD requires the applicant to prepare a detailed Transport Assessment, and impact mitigation will be required and secured as part of any future planning application, having regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

**Action:**

None

## 7

**Respondent:** Mr Gary Plummer [23]

**Change suggested by respondent:**

The council needs to face facts and accept that people prefer their own vehicles, and a majority WILL NOT CYCLE, or WALK, or catch a bus.
There are far better things money could be spent on rather that waste it on cycle lanes and a rapid transport system that will see more Tumbleweed than cyclists or passengers.
Build a better road system that can cope with the additional traffic, rather than continue to be anti car!

**Attachments:** None

# Object

**Summary of representations:**

Whoever proposed this development is living in cloud cuckoo land. By definition a road is a place for vehicles it is not a playground. If the council continue with such ridiculous ideas i hope that they are prepared for all of the accidents which will follow.
Roads and streets are for vehicles, parks and playgrounds are for playing, you cannot mix the 2 as you are inviting problems.
You cannot dress up a rapid transport system, It is a bus.
The council can't vet all of the new residents to ensure they don't have cars!

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into this network.

The DPD also emphasises the importance of sustainable travel which reflects Garden City Principles and Section 1 Local Plan Policy SP6 requirements where the DPD needs to specify target mode share.

The Principles outlined at the start of the Chapter (where reference is made to ‘people focused streets’) are taken from the ‘Tendring Colchester Borders Garden Community Masterplan: Strategic Vision’ evidence base document (January 2022) and DPD policies reflect these principles.

**Action:**

None

## 10

**Respondent:** Mr Gary Plummer [23]

**Change suggested by respondent:**

I think somebody needs to go and lie down in a dark room, as clearly they have had to much sun, and its sent them slightly insane.

Roads and street by definition are for vehicles and this notion needs to be maintained, the plan needs to change to reflect this. If you encourage people especially younger children you will be putting them at risk.

Roads = Vehicles
Parks and playgrounds = People

**Attachments:** None

# Object

**Summary of representations:**

There is no consideration for the equestrian user group in this Plan. The creation of a new Country Park provides opportunity to create new riding routes, but the equestrian user group has been completely ignored which is inequitable. A full response has been provided as have proposals for the incorporation new equestrian friendly routes.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The policy requires all proposals to demonstrate how connections are being made to the existing PRoW and green-blue infrastructure network, and how existing routes within the site will be retained, preserved and enhanced where relevant (GC Policy 7, Part B). Suitable routes within the garden community will be considered as part of the masterplanning and planning application process.

**Action:**

None

## 12

**Respondent:** Essex Bridleways Association (Mr Martin Crisp, Bridleways Development Officer) [25]

**Change suggested by respondent:**

We note that the Plan proposes the creation of a new Country Park, (Salary Brook), including land and woodland at and around Salary Brook Local Nature Reserve that connects with a wider network of green corridors and walking/cycleways throughout the garden community. Again, seemingly no thought for equestrians. It is our strong view that consideration should be given to the creation of a new circular bridleway as part of the Country Park planning, extending into adjoining planned green spaces, and that further consideration should be given as to whether said new Bridleways could link with the Restricted Byway 162-21 situated within the radius of the proposed Garden Community.

**Attachments:** None

# Object

**Summary of representations:**

I believe that the route to the A120 should be completed before any residential construction works occur. I feel that it would not be satisfactory to allow the additional traffic form the new residential dwellings to be routed via the existing Colchester to Elmstead A133 road.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

Planning permission has been secured for relevant sections of the RTS outside of the Garden Community and for the full A133/A120 Link Road. Funding for both strategic infrastructure projects is through the Housing Infrastructure Fund (HIF) to secure the full RTS route and Phase 1 of the Link Road. The funding and delivery of the remainder of the Link Road is a matter for any future garden community planning application and associated Section 106 agreement when it comes forward for determination. The DPD requires infrastructure delivery to align with each development phase.

**Action:**

None

## 13

**Respondent:** Mr James Biltcliffe [26]

**Change suggested by respondent:**

Ensure A120 access is completed and mandated for use before construction of any residential dwellings occur

**Attachments:** None

# Object

**Summary of representations:**

1) the new link road to the A120 is ESSENTIAL before ANY houses are built, to avoid Clinghoe Hill becoming Colchester's biggest car park and imprisoning Wivenhoe residents in the village

2) the 'rapid transit' is a complete con and will be an ordinary bus, which no one will use.

3) the 'cycling plans' ignore that (a) the development is on the top of a big hill and so cycling into Colchester will be fine, but not coming back. It also rains a lot and no one will cycle in the rain.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

Planning permission has been secured for relevant sections of the RTS outside of the Garden Community and for the full A133/A120 Link Road. Funding for both strategic infrastructure projects is through the Housing Infrastructure Fund (HIF) where £99m will secure the full RTS route and Phase 1 of the Link Road. The funding and delivery of the remainder of the Link Road is a matter for any future garden community planning application and associated Section 106 agreement when it comes forward for determination. The DPD requires infrastructure delivery to align with each development phase.

Further transport assessment will be required as part of any future planning application, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

**Action:**

None

## 14

**Respondent:** Mr Timothy Wood [29]

**Change suggested by respondent:**

The whole mad idea should be scrapped! But if it can't be, the new road and a viable 'rapid transit system' (not a ramshackle ex school bus) MUST be provided BEFORE any houses are built.

**Attachments:** None

# Object

**Summary of representations:**

Why do we need a link road?
Please don't say to reduce traffic when you are building the GC with 9000 homes averaging 27.000 people, not including the Industrial and travellers site and shops.
If this monstrosity was NOT being built we would not need this link road! A village meaning a "rural area" which this will be taken away from our village life! I moved to the countryside meaning "the land and scenery of a rural area" which is now being taken away from us and children of Elmstead. I cannot understand why an unfinished road that is costing £50 Million to build when the whole county/country is in poverty! Just because the council have a "pot" of money that you "need" to use otherwise it goes to another county, is not acceptable!
Distribute the money out to those that need it and change lives for the better! This is disgraceful behaviour from the council!

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment (TA), regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K. The TA would need to set out the trigger point for when Phase 2 of the Link Road will be required.

Planning permission has been secured for the full A133/A120 Link Road. Forward Funding is through the Housing Infrastructure Fund (HIF) where £99m will secure the full RTS route and Phase 1 of the Link Road. The funding and delivery of the remainder of the Link Road is a matter for any future garden community planning application and associated Section 106 agreement when it comes forward for determination. The DPD requires infrastructure delivery to align with each development phase.

The viability evidence (and the Infrastructure Delivery, Phasing and Funding Plan) prepared on behalf of the Councils demonstrates that the identified increased costs for the Link Road could be met by the developer.

**Action:**

None

## 25

**Respondent:** Gemma Robinson [54]

**Change suggested by respondent:**

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**Attachments:** None

# Object

**Summary of representations:**

There is a lack of road repairs, with a great number of potholes unrepaired. Increase in traffic flow would be detrimental to Elmstead and further damage our roads.
We don't have a dentist, fire station, secondary school or any other health facilities.
Only one small grocery store.
Increased traffic and homes would impact on our minimal street services ie street cleaning, fly tipping road repairs refuse service and bus route
There is also the Environmental Impact on our elderly residents through increased air pollution.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery. The impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

Planning conditions for the Link Road require appropriate mitigation during the construction phase.

**Action:**

None

## 27

**Respondent:** Elizabeth Thompson [53]

**Change suggested by respondent:**

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**Attachments:** None

# Object

**Summary of representations:**

Officers summary:No thought has gone into how our village can manage the volume of traffic when most local people have to travel to get medical treatment shopping and other important essentials to better their lives. The village has already grown to twice its size with new homes.
No thought has gone into our villages, infrastructure for roads crossings and just to maintain quality of life. The increased traffic will cause more accidents and people not being able to access medical help via ambulances the traffic which is going to cause delays. people will die.
Elmstead will become isolated with no way of getting to Colchester for the essentials to maintain a quality of life that we expect.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan. The impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

**Action:**

None

## 34

**Respondent:** Mrs Pam Cowell [56]

**Change suggested by respondent:**

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**Attachments:** None

# Object

**Summary of representations:**

Transport links must be improved for all residents in the area, not just those within the proposed development.
Expecting families or working-age residents not to own or use one or more vehicles is unrealistic.
Existing cycle routes in the city are ignored, so how is the very hilly proposed development area going to be any different?
Horse riding is mentioned more than once, where are these horses going to be kept, and who can afford to own one?

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K. This would include transport links within and beyond the site.

The DPD does not place any restrictions on car ownership.

The Colchester Local Cycling and Walking Implementation Plan shows a range of improvements and routes close to the garden community and these are reflected in the DPD and in the transport evidence base.

In terms of Bridleways, all legal users should be considered where plans are made for new and/or improvements to a route for active travel modes, on the Public Rights of Way network. The Councils believe this is covered in GC Policy 7 Part B. Suitable routes within the garden community will be considered as part of the masterplanning and planning application process.

**Action:**

None

## 38

**Respondent:** Miss Deborah Jones [62]

**Change suggested by respondent:**

Please consider how existing villages and towns outside the proposed development will be integrated. Transport links must be improved for all residents, not just those within the proposed development. There does not seem to be any joined-up thinking, or consideration for how the proposed development will impact existing infrastructure and services.

There is not enough employment locally so many people will travel outside the city. It is unrealistic to expect people to only work on their doorstep, and not to own or use a car for travelling distances. If families rely on parents/grandparents for childcare, how will these visitors access the development as they will not necessarily live locally? Expecting visitors to walk up to 20 minutes or use public transport after travelling some distance would be unpopular, impractical, and potentially impossible for some.

There are many cycle routes around the city already, the majority are ignored. The hills around the city are huge, and the proposed development is miles from anywhere. Cycling will not be popular, and is impractical as a sole transport option for many.

Why promote horse-riding as a travel option? Where are all these horses, and who could afford the stabling and upkeep? Maybe a few residents would possibly choose horse-riding as a leisure pursuit, but not as a viable sustainable transport option.

**Attachments:** None

# Object

**Summary of representations:**

Officers summary: This would cause huge amounts of traffic in a small village, causing more congestion and pollution. The back log of traffic along the A133 is very busy during rush making the road more dangerous than it already is. I have young children who attend the local school in Elmstead and crossing the A133 can sometimes take 6-7 minutes due to no crossing that has been promised for years. The roads are busy enough without adding more oncoming and outgoing traffic. This will just overpopulate the areas surrounding.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan. The impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

**Action:**

None

## 46

**Respondent:** Ria Lockwood [71]

**Change suggested by respondent:**

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**Attachments:** None

# Object

**Summary of representations:**

- Concerns raised with regard to the HIF funding and Link Road Phasing. No indication of how many dwellings etc might be built before the completion of the link road nor is there any guarantee that it will be 'practically and financially possible' for it to be funded.
- Insufficient detail with regard to the RTS route, operation and implications for Clingoe Hill.
- Demand for the proposed Park & Choose needs to be justified.
- Further detail is required for the junctions, crossing and roundabouts on the A133. With increased traffic levels the junction layout as shown on the Policies Map must be demonstrated to be workable.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K. This includes requirements related to Park and Choose and would need to set out the trigger point for when Phase 2 of the Link Road will be required.

The viability evidence (and the Infrastructure Delivery, Phasing and Funding Plan) prepared on behalf of the Councils demonstrates that the identified increased costs for the Link Road could be met by the developer.

The position of the Link Road has already been established through an approved Planning Application. The Policy Map is consistent with the consent granted.

The Policy Map provides an indicative route for the RTS, the details of which would be determined at planning application stage through detailed masterplanning and design development, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

**Action:**

None

## 56

**Respondent:** Wivenhoe Society (Prof Jane Black, committee member) [48]

**Change suggested by respondent:**

The phasing of the link road build out must be discussed. Details of the RTS off site need to be explained and justified. Access for this to the site should not be located at the A133/B1027 junction.

**Attachments:** None

# Object

**Summary of representations:**

Travel into Colchester will result in very much increased congestion in Clinghoe Hill, roundabouts near Tesco, East Street and level crossing.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K

The RTS is fully supported by a schedule of works and delivery programme for areas outside of the garden community. The Policy Map provides an indicative route for the RTS, the details of which would be determined at planning application stage, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

**Action:**

None

## 61

**Respondent:** Ms Jean McNeil [82]

**Change suggested by respondent:**

The plan needs to show how rapid transit and other vehicles will enter Colchester without putting any more pressure on present entry points.

**Attachments:** None

# Object

**Summary of representations:**

Imperative to build the "through road" first with construction traffic operating from A120 NOT A133 as this is a very congested road; not safe or viable to increase traffic even more down here.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

The proposed approach to phasing the Link Road has been agreed between Essex County Council and Homes England who administer the Housing Infrastructure Fund.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

The DPD seeks to emphasise and facilitate sustainable travel as required by the Section 1 Local Plan (Target modal shares for each transport mode and details of sustainable transport measures to support their achievement) but does not preclude or restrict the use of private vehicles. DPD GC Policy 7, Part G covers matters related to parking - vehicles, electric vehicles and cycling – and requires no resulting overspill and inappropriate on-street parking.

**Action:**

None

## 65

**Respondent:** Mrs Linda Forth [88]

**Change suggested by respondent:**

Imperative to phase the building works from A120, not A133, with proper slip roads from A120 as the access via A133 is not safe and will cause long term serious congestion.
Ensure Rapid Transit System and "through road" operational before start of these construction phases. RTS would need an extra lane on A133. It caters for the new garden community residents and not people travelling into Colchester from Tendering and surrounding areas, so will not improve traffic flow in that respect and it is already dangerously congested. Wivenhoe is the nearest railway station to the garden community, with the university running a regular bus service to it. It is a conservation area with very narrow roads, a weak railway bridge to cross and very narrow pavements. The RTS will not deter the new residents from trying to drive to Wivenhoe Station to commute rather than to Colchester Station. Naive to think they will choose to work on the site itself and the current Park&Ride in Colchester is barely used as it is, so why will the RTS be any different? 7000 new homes need bespoke doctors and dentists surgeries, not just regular visits to their local community centre as is currently proposed. Employment on site, please allow sufficient parking at the business park, bearing in mind people from outside the garden community may choose to work there and the RTS is planned to start from there and not from a park & ride on the eastern side of the development? 7000 houses/flats will result in parking issues. Ensure sufficient parking per household and enough space on roads for parking. People will continue to own cars, unless they're banned!! Environment/Nature - careful timing and handling of wildlife issues imperative.

**Attachments:** None

# Object

**Summary of representations:**

'To ensure neighbourhoods are walkable, low traffic and livable, where residents can access most of their daily needs within a 20-minute walk or safe bike ride from their home'. I for one would not want to try and cycle or walk home with my 6-8 shopping bags after my weekly food shop!!!! Nor would I take the bus. People with always navigate towards using their cars as it is quicker and easier. Most houses tend to have 1-2 cars, add a couple of kids who drive and a family household can have 3 cars + !

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan. The DPD seeks to emphasise and facilitate sustainable travel in accordance with Garden City Principles and as required by the Section 1 Local Plan (target modal shares for each transport mode and details of sustainable transport measures to support their achievement). It's not about making everyone walk or cycle but rather making shorter journeys easier where this can be done by walking or cycling.

**Action:**

None

## 74

**Respondent:** Mrs Sasha Phillips [91]

**Change suggested by respondent:**

There is no way Colchester can cope with 9000+ households with all their cars. The only change would be to dramatically reduce the size of the development.

**Attachments:** None

# Object

**Summary of representations:**

- The route of the RTS is too vague.
- The buses will always be in traffic struggling through bottlenecks. There are no plans to address these points by building new bridges or underpasses.
- A clear definition of the route and identification of the bottlenecks and costings for resolving them is required.
- There is no indication of how the RTS will be paid for.
- The RTS will be built in stages according to the sale of properties to fund each part. This means years of increased traffic, starting with Heavy Goods Vehicles.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Policy Map provides an indicative route for the RTS, the details of which would be determined at planning application stage through detailed masterplanning and design development. Further transport assessment by the applicant will be required and secured as part of any future planning application, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

Works for RTS infrastructure outside the Garden Community boundary are currently on site and include a range of priority measures.

**Action:**

None

## 78

**Respondent:** Mr Michael Watson [85]

**Change suggested by respondent:**

The plan is too vague and has not addressed issues raised by groups and individual members of the public.

**Attachments:**

Consultation document Garden Village.docx - https://tcbgardencommunity.oc2.uk/a/4

# Object

**Summary of representations:**

This is a vital aspect of the whole project and at the same time the most ill-defined. It's not clear how the RTS will work, esp. financially. It is not clear how it ties in with the other public transport in Colchester. "Active travel" is highlighted, also linked to the RTS, but how does this tie in with wider national rail links and/or travel to and from airports or the port of Harwich, for example?

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The Policy Map provides an indicative route for the RTS, the details of which would be determined at planning application stage through detailed masterplanning and design development, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

**Action:**

None

## 85

**Respondent:** Dr Christina Volkmann [102]

**Change suggested by respondent:**

I would like to see a lot more concrete information on the RTS - how it will be financed, how exactly it will work, how it ties in with other public transport infrastructure. The RTS should also be made a deal maker/breaker for the whole development.

**Attachments:** None

# Object

**Summary of representations:**

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

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery. Further transport assessment will be required as part of any future planning application, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

**Action:**

None

## 92

**Respondent:** Mr David Mead [27]

**Change suggested by respondent:**

-

**Attachments:** None

# Object

**Summary of representations:**

It has already been decided that the link road will not be open before development. A key selling point of the Project was that it would be infrastructure led. Colchester roads will suffer. The rapid transit system is a fantasy that will not solve the traffic problems

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

**Action:**

None

## 103

**Respondent:** Mr Michael Lucking [112]

**Change suggested by respondent:**

The developers need to deliver the full link road before houses are built

**Attachments:** None

# Object

**Summary of representations:**

- Building 7,500 new homes without the A133-A120 Link Road constructed first will put additional pressure on an already busy network, in particular Clingoe Hill and the Hythe.
- New bus and rail links are unlikely to come to fruition. This will add additional load to the traffic system.
- The reduction in parking spaces in the GC will lead to cars being parked on green areas/pavements. The cars will be there and will be needed.
- Traffic from the industrial parks will also put pressure on the A133 if there is no link road.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

DPD GC Policy 7, Part G covers matters related to parking specifically vehicles, electric vehicles and cycling and no resulting overspill and inappropriate on-street parking.

**Action:**

None

## 110

**Respondent:** Mr Shaun Raven [37]

**Change suggested by respondent:**

-

**Attachments:**

# Object

**Summary of representations:**

At present traffic from Elmstead going into Colchester and beyond via the A133 is heavy and there can be significant delays at peak times. The additional traffic caused by the new development would be negative and result in increased wait times to travel into Colchester and beyond. This would have an impact of increasing air pollution and reduce quality of life for residents. The new link road would potentially not be built for a considerable time and the period in the lead up to it's use would be awful for those travelling and those affected by the air
pollution.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery. The principle of development has been established by way of the adopted Section 1 Local Plan. The impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

Planning conditions places on the Link Road require appropriate mitigation during the construction phase.

**Action:**

None

## 117

**Respondent:** Mrs Helen Byrne [32]

**Change suggested by respondent:**

- Reduction in volume of houses to impact on traffic/air pollution.
- New road must be built early on in development.

### Attachments:

# Object

**Summary of representations:**

Concern about sequence and order of action, regarding RTS and link road between A120 and A133

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

Further transport assessment will be required as part of any future planning application, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

**Action:**

None

## 133

**Respondent:** Mrs Claudia Alsdorf [116]

**Change suggested by respondent:**

Link road is vital to be completed at the beginning of phase 1 housing development. Funding seems not secured completely, therefore priority might have to be changed from RTS to link road and funds reallocated, in order to complete link road first, with access to the business park in the corner off link road junction with A120 which would then attract businesses. The existing bus routes could be changed to create a reliable, frequent, affordable (say, flat fee of 2 pounds a trip, or smart card, free for residents), joined up loop linking new development with university, Hythe, north STation, hospital, stadium, and via link road back to A133.

**Attachments:** None

# Object

**Summary of representations:**

If Housing Infrastructure Fund monies are insufficient for the full cost of the A133-A120 link road how can planning approval be given to the Garden Community?
What happens if only the first phase at A133 end can be completed because rising costs make financial delivery of the second phase linking to A120 untenable?
I am concerned about the likely increase in traffic on the A133 affecting travellers from Elmstead Market, Wivenhoe, Alresford, Thorrington and Brightlingsea.
What is the exact route of the RTS alongside Clingoe Hill?
The impact of the RTS on Greenstead roundabout is unclear in the plan.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

The position of the Link Road has already been established through an approved Planning Application. The Policy Map is consistent with consent granted.

The Policy Map provides an indicative route for the RTS, the details of which would be determined at planning application stage through detailed masterplanning and design development, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

**Action:**

None

## 140

**Respondent:** Mrs Sarah Chandler [93]

**Change suggested by respondent:**

> Explanation of the two phases of construction of the link road A133-A120.
> The plan needs to include a detailed description of the RTS route outside of the Garden Community so its impact on Clingoe Hill and the Greenstead roundabout can be understood.

**Attachments:** None

# Object

**Summary of representations:**

Currently the traffic down Clingoe Hill to the roundabout into Colchester is frequently heavily congested. The work to Clingoe Hill for the RTS will be horrendous as sensible alternative routes into Colchester don't exist. It is brilliant that so much work is being considered to reduce the use of cars in the garden community but realistically there will still be a considerable number. Local residents had been promised the link road to the A120 would be completed before the building commenced and this is no longer the case. Without this link road I cannot see how the plan can work.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

Further transport assessment will be required as part of any future planning application, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

The proposed approach to phasing the Link Road has been agreed between Essex County Council and Homes England who administer the Housing Infrastructure Fund.

**Action:**

None

## 141

**Respondent:** Rev Pauline Scott [136]

**Change suggested by respondent:**

I think the money set aside for the RTS scheme should be used to complete the link road. In the interim, current bus services can be extended to cover some of what the RTS would offer - note current bus services are able to bypass Clingoe Hill by going through the university - a route banned for cars. The early days of the RTS scheme would be heavy on subsidy and the money could be used to more effect. The route for the RTS scheme also needs further work too in my opinion in order to maximise its effectiveness - up to date traffic surveys and proper consideration of where it is needed and whether Elmstead and Wivenhoe too could access its services. Doing the link road first would allow time for this work to be done.

**Attachments:** None

# Object

**Summary of representations:**

The completed A133-A120 link road is critical to the success of the TCB Garden Community. The TCBGC Community Liaison Group strongly recommend its completion as a matter of priority BEFORE house building commences PLUS radical re-routing of the planned RTS to utilise the link road onto the A120 in an anti-clockwise circular route around and into Colchester, thus avoiding the need for expensive road widening works, saving million of pounds on Clingoe Hill and in central Colchester, and ensuring the TCB Garden Community meets the modal shift and sustainability goals outlined in the DPD and Section 1 Local Plan.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

The Policy Map provides an indicative route for the RTS, the details of which would be determined at planning application stage through detailed masterplanning and design development. Further transport assessment will be required secured as part of any future planning application, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

Building upon the information set out in the DPD evidence base, to assist the PT strategy to be submitted as part of the planning application.

RTS routing options were explored as part of the Section 1 Local Plan RTS evidence base.

**Action:**

None

## 143

**Respondent:** TCBGC Community Liaison Group [104]

**Agent:** Mrs Manda O'Connell

**Change suggested by respondent:**

The CLG contends that
a) The £21 million ring-fenced for the RTS should be instead put towards completing the link road FIRST, so that it is in place before the first houses are built and
b) the route for the RTS should be drastically changed to a route which does not utilise the A133 Clingoe Hill, already hugely congested, or go through an equally hugely congested central Colchester necessitating millions to widen roads and introduce bus lanes. Instead it should be redrawn to use the route suggested by the CLG and shown in the attached file labelled Alt_RTS_Route. This is already in part dedicated bus routes and will all , once the link road is constructed, be fit for use for a modern RTS system. That suggested route is shown in the attached file. It avoids Clingoe Hill in favour of already dedicated bus routes through Elmstead Road, Capon Road and Boundary Road (used by First Buses, routes S1 and 87), links all the key destinations required including the Northern Gateway and Garden

Community Park and Choose, the hospital and North Station, together with a stop at the top of Balkerne Hill to access central Colchester, and the University and Knowledge Gateway. It would operate in a loop in an anti-clockwise direction, utilising roads which are already fit for use for a modern RTS system, thus saving millions of pounds. It would be in place as soon as the link road is constructed in full linking the A133 and the A120, ready for the new residents to adapt to new patterns of travel behaviour without the car, achieving modal shift, because all key destinations as listed above are quick, frequent and accessible via the RTS.

The key stops that the new route would link are as follows, starting from the Park and Choose at the bottom edge of the TCB Garden Community on the A133:
- The Garden Community stops (initially the first (southernmost) developed community)
- The A120 employment park, top right of the Garden Community (providing fast transport to work for Garden Community residents who are employed there)
- Severalls Lane and Colchester Business Park, also an employment hub. Shown on the map as being accessed via the Ipswich Road and Severalls Lane, Colchester Business Park does have a route into and through the Business Park from the A120/A12 junction, which may be preferable and give a smoother curve on the route.
- The Stadium
- Colchester Sports and Leisure Park
- Northern Gateway Park and Ride
- Colchester General Hospital
- Colchester North Station
- Top of Balkerne Hill stop for the town centre (by the old Embassy Suite)
- St Botolphs train station
- Bottom of Hythe Hill (for walking access to Hythe station just over the bridge over the river Colne)
- Start of Elmstead Road (for access to Tesco The Hythe)
- End of Capon Road, on Boundary Road, for access to Essex University's Innovation Centre, Essex Business School and the Knowledge Gateway Science and Business Park
- Back to the start of the loop at the Park and Choose on the junction of the A133.

The link to this Google map is shown below. It allows the user to zoom in, move the map around and view in different ways just as you can with a regular Google map. https://www.google.com/maps/d/edit?mid=1jDmOLSmGRF5PHD61n7TSBD5HlZiP__0&usp=sharing

Benefits of this recommended revised approach
The benefits completing the link road in its entirety BEFORE commencement of homes being built together with an RTS that utilises the anti-clockwise route shown are as follows:

1) Using the route proposed, no building work for extra bus lanes etc needs to be done on Clingoe Hill, in either direction, thus avoiding the horrendous congestion that would result therefrom.
2) No expensive road alterations need to be made through central and historic Colchester. The new route would skirt the town centre, with a key stop at the top of Balkerne Hill by the Embassy Rooms to access the centre, and then again at St Botolphs train station.
3) This could potentially pave the way for central Colchester to be pedestrianised or remain as it is, being served by local bus routes.
4) The proposed alternative to Clingoe Hill (Elmstead Road, Capon Road, Boundary Road, B1028/27 back to A133) is already a dedicated bus route (First Buses Routes S1 and 87)
5) Much of the route is already in place and fit for purpose for an RTS (A120, Severalls Lane, Axial Way, Via Urbis, plus Elmstead Road avoiding Clingoe Hill above) thus presenting a huge cost saving.
6) The saved cost of works on Clingoe Hill alone would contribute a large proportion of the monies needed for the completion of the link road.
7) The completed link road would immediately begin to relieve pressure on Clingoe Hill by providing a through route for traffic going to North Station or the hospital or the A12.
8) Because of the immediate fast access via the RTS anticlockwise route to North Station or the A120 employment

park in the north west corner of the Garden Community or even Colchester Business Park, or Colchester General Hospital, new Garden Community residents working in London or any of the other locations would very easily adopt this modal shift from the outset. If there is a wait of 5-16 years for the link road to be completed this opportunity will have been lost. Much of the soundness of the TCBGC derives from its having the link road and not having to be dependent upon routes into Colchester, either for employment, schools, hospital care, shopping or travel.
9) It would meet the previous inspection's criterion for soundness as the link road would be doing as it was intended in siphoning traffic with onward destinations beyond Clingoe Hill off from the A133 and onto the A120 or beyond.
9) The Park and Choose on the Garden Community with the new RTS anti-clockwise route to access these destinations then also becomes a very real possibility from the outset.
10) Already it is painfully difficult to get a parking space in the hospital car park because it is so overloaded and people often have to drive around waiting for someone to leave before they can park. This will only be exacerbated with a larger demographic. However, with a fast RTS system adopting the proposed anti-clockwise route, residents from all communities east of Colchester can use the Park and Choose on the Garden Community to not only avoid battling with the traffic on A133 Clingoe Hill and beyond but avoid driving to the hospital at all using the RTS with the looping anti-clockwise route proposed by the CLG.

Recommendation
Very much of the strength and soundness of the TCBGC project relies on its provision of self sustainability ie for schools, healthcare, employment and shopping without having to travel outside of the Garden Community either to put added pressure on road infrastructure, or services found in surrounding communities. The RTS route plan shown in the current DPD, based on a link road that does not link, is in direct contradiction of this. As the point of the link road is to reduce traffic going into Colchester and a central tenet of the Garden Community is to be self-contained, why are huge sums being spent to provide an RTS to increase this traffic and access services outside the Garden Community? And this is at the expense of the mitigating link road, and using the very route whose traffic the link road was intended to alleviate. This is also in direct contravention of the key principles of the Garden Community and one of the chief causes of controversy, concern and dismay, expressed from the outset, in local communities.

We would contend that the TCBGC Transport Evidence Base Part 2 Measures report commissioned by the Councils and provided by Ringway Jacobs is far too narrow and limited in its outlook and with its RTS proposals and routing is merely providing a very expensive sticking plaster which will not meet demands even 10 years into the future, as the report itself admits: p5 'The RTS HIF project is introducing priority measures on the approach to Greenstead roundabout which is expected to operate satisfactorily up to 2033 for RTS vehicles' but 'In the potential second phase of investment post 2033, it would be expected that the garden community would be continuing to grow but a general increase in car trips could be threatening RTS reliability and worsening RTS journey times on the route west of Greenstead roundabout, which would work against achieving mode share targets and sustainable travel aims.'

Recommended movement and travel routes must therefore adopt a much broader future-proofed approach to accommodate the transport needs of an additional 17,500 people (2.3 persons living in each of 7,500 homes) on the east of Colchester. This is represented by the proposal outlined here by the CLG in putting the unnecessary sticking plaster monies described above towards completion of the link road as originally intended by the Housing Infrastructure Fund, together with the wider circular and much more economical RTS revised route, shown in the attached file, which will accommodate a thriving community 50 years into the future and beyond, without impinging on or increasing congestion of surrounding road and central Colchester infrastructure. To do anything else is to render the whole of the good work done by the planners in other areas such as Land Uses and Spatial Approach, and the aspirations embodied in both the Section 1 Local Plan and other TCBGC policies hamstrung at best by this crippling and at best wholly inadequate approach.

Note: It is also of some concern that the plan currently proposed is based on a report (TCBGC Transport Evidence Base Part 2 Measures) by an organisation (Jacobs part of Ringway Jacobs, who describe themselves thus: 'We design, create and maintain world-class, safe, efficient and environment-friendly highway infrastructure for local authorities') which may stand directly to gain commercially and financially from these very expensive and by their own admission inadequate and time-limited plans. It is also of concern that the proposal actually in real terms

detracts from the soundness of and benefit to the TCBGC, by utilising funds which should go towards the full completion of the link road, as well as actually exacerbating harm to surrounding communities.

The CLG assert therefore that it is absolutely vital NOT to delay the completion of the link road – it was deemed to be fundamental to the soundness of the TCB Garden Community by the last inspection and on it hang very many of the Garden Community's goals and aspirations. To leave it undone is to strike at the very heart of the soundness of the project. We would therefore urge the Inspector to include our proposals – to complete the link road from the outset and to re-route the RTS – as main modifications in their inspection report to transform the DPD from what is otherwise an extremely unsound plan which may even see the vision of the TCBGC dashed entirely, to one that is sound, pragmatic and meets all of its aspirations.

### Attachments:

Alt_RTS_Route.pdf - https://tcbgardencommunity.oc2.uk/a/b
Alt_RTS_Route_inc_Wivenhoe+Elmstead.pdf - https://tcbgardencommunity.oc2.uk/a/c
CLG Rep Policy 7 - https://tcbgardencommunity.oc2.uk/a/tf

# Object

**Summary of representations:**

Additional traffic onto A133

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The position of the Link Road has already been established by an approved Planning Application.

**Action:**

None

## 145

**Respondent:** Mr David Ward [134]

**Change suggested by respondent:**

Vehicular access only available via the A120, no access to the A133, apart from public transport, cycles, footpaths etc.

**Attachments:** None

# Object

**Summary of representations:**

The link road must be completed before the first houses are built, otherwise there will be significant extra congestion in Colchester.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

The Policy Map provides an indicative route for the RTS, the details of which would be determined at planning application stage through detailed masterplanning and design development, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

Building upon the information set out in the DPD evidence base, to assist the PT strategy to be submitted as part of the planning application.

**Action:**

None

## 147

**Respondent:** Mr James Marchant [138]

**Change suggested by respondent:**

The link road should be completed before housing development starts.
The RTS should use the link road, going anti-clockwise around Colchester, a route which would require minimal expenditure and avoids Clingoe Hill using already existent bus routes.
Please see submissions from Tendring Colchester Borders Garden Community Liaison Group.

**Attachments:** None

# Object

**Summary of representations:**

What a wonderful idea that people will walk, cycle to work, school, etc. realistically this will not happen. I feel that this report glosses over the fact that most people have at least two cars, mainly because they need vehicles for work, shopping, school runs etc. to suggest that by merely installing these utopian visions of a green, traffic free, we will ignore the reality that the roads around colchester will be more congested by this development, people will not do their weekly shop by bus, or cycle, the rapid transit system will not cater to the needs of everyone.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery. The DPD seeks to emphasise and facilitate sustainable travel as required by the Section 1 Local Plan (target modal shares for each transport mode and details of sustainable transport measures to support their achievement) but does not preclude or restrict the use of private vehicles.

**Action:**

None

## 155

**Respondent:** Mrs Susan Burns [69]

**Change suggested by respondent:**

Drastically reduced and more realistic reports on the negative impacts this will have, as we know there will be many of them.

**Attachments:** None

# Object

**Summary of representations:**

The concept of the community was presented as being infrastucture driven, with a link road being a key feature due to the increasing traffic issues affecting this side of Colchester. Without this being built/ completed before development begins, these issues will only increase. Existing roads within the search area are country lanes, in the main, that cannot sustain large numbers of vehicles. The RTS that is proposed is a bus service that will be 'demand led', yet does not fully recognise the increasing growth of out of town amenities around Colchester which mean people need transport to get to them.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

Further transport assessment will be required as part of any future planning application, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network. Building upon the information set out in the DPD evidence base, to assist the PT strategy to be submitted as part of the planning application.

**Action:**

None

## 165

**Respondent:** Mr Christopher Burns [140]

**Change suggested by respondent:**

There should be a clear obligation for the link road to be completed before development begins.

**Attachments:** None

# Object

**Summary of representations:**

The Cling Hill access to Colchester is already very congested, with long delays at peak periods. The A133 to A120 link road needs to be in place before the development starts, to mitigate the impact of the new community on this choke point.
While the rapid transit system appears a good idea, it looks like it will need expensive subsidy and capital spend to deliver. Given that usage is likely to be low until there are a substantial number of houses in the new development, it would be better to complete the link road and delay the rapid transit system.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

Further transport assessment by the applicant will be required as part of any future planning application, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.
Building upon the information set out in the DPD evidence base, to assist the PT strategy to be submitted as part of the planning application.

The proposed approach to phasing the Link Road has been agreed between Essex County Council and Homes England who administer the Housing Infrastructure Fund.

**Action:**

None

## 170

**Respondent:** Mr Andrew Scott [141]

**Change suggested by respondent:**

Complete the A120/A133 link road before development starts.
Explain how developers will ensure that streets in Wivenhoe are not used for new community residents parking for Wivenhoe train station.
Delay rapid transit system until there is a reasonable number of houses, using the funds released to complete the link road.

**Attachments:** None

# Object

**Summary of representations:**

Our particular concern is Bromley Road. The policy states that 'The Garden Community must restrict vehicular connectivity, except for public transport and emergency vehicles, between the 'Link Road' and Bromley Road' meaning that Crockleford Hub residents will not be able to access the link road (although also meaning that residents of the other Hubs and people coming off the link road will not be able to drive to Bromley Road).

See earlier attachment.

**Summary of representation changes to plan:**

None

**Response:**

Comment Noted. Detailed design will come forward at planning application stage, including the character, layout and placemaking associated with the identified neighbourhoods. Further transport evidence/assessment by the applicant will be required as part of any future planning application, which will need to consider access arrangements for Bromley Road.

**Action:**

None

## 176

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

**Change suggested by respondent:**

We are worried about the potential implications on and beyond Bromley Road and want to see more modelling and evidence that this can deliver the objectives and not have unintended consequences for our residents.

**Attachments:** None

# Object

**Summary of representations:**

- Existing congestion in Elmstead village will be made worse. NO proposal to improve A133 in this location.
- Should make sustainable travel easier, not private car journeys harder.
- Streets should be primarily for travel, not play.
- Travel connections biased towards Colchester.
- Only connection to Tendring is by car.
- Concerns around illustrative plan, irregularities around access to southern neighbourhood and dead end connections, pedestrian connections over A133, indirect route of cycle route in north east.

Part A

- Unclear language and meaning.
- Modal share targets should be stronger and more aspirational.

Part B

- Concerned that parking control in GC will lead to problems elsewhere.

Part C

- Concerned over how convenient public transport will be.
- Greater distinction needed between RTS and other bus operators.

Part D

- Concerns regarding wider connectivity and effectiveness of RTS due to congested roads.

Part E

- Electric vehicle charging ranks will increase pressure on land use and density.

Part F

- Park and choose without direct access to A120 is ineffective.

Part G

- Concerned about moving parking problems elsewhere.
- No provision for HGV parking.

Part I

- Object to direct junction from A133 to GC. All access should be from the link road.
- Restricting car journeys between link road and Bromley Road will negatively impact existing residents of Bromley Road who have links to Elmstead.
- Horse riding shouldn't be a high priority.

Justification

- A single healthcare hub can't be accessible within 20-minutes from all neighbourhoods.
- Link road will lead to high to severe impact on breathable air quality in Elmstead (and GC site)
- Planning has been biased to Colchester's benefit.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted

Detailed design will come forward at the planning application stage/s, including the character, layout and placemaking associated with the identified neighbourhoods. The Strategic Framework Masterplan is illustrative only, whilst the Policy Map provides sufficient clarity and flexibility to secure and respond to the long-term aspirations and demands of the development.

The DPD emphasises the importance of sustainable travel which reflects Garden City Principles and Section 1 Local Plan Policy SP6 requirements where the DPD needs to specify target mode share. The targets reflect the DPD evidence base.

The impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.
Building upon the information set out in the DPD evidence base, to assist the PT strategy to be submitted as part of the planning application.

In terms of Bridleways (horseriding), all legal users should be considered where plans are made for new and/or improvements to a route for active travel modes, on the Public Rights of Way network. Suitable routes within the garden community will be considered as part of the masterplanning and planning application process.

**Action:**

None

## 185

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

**Change suggested by respondent:**

-

### Attachments:

EPC Representations - https://tcbgardencommunity.oc2.uk/a/tv

# Object

**Summary of representations:**

I support the alternative proposal submitted by the community liaison group as supplied by email as this portal is not suitable to input the arguments

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

The Policy Map provides an indicative route for the RTS, the details of which would be determined at planning application stage through detailed masterplanning and design development. Further transport assessment will be required secured as part of any future planning application, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

Building upon the information set out in the DPD evidence base, to assist the PT strategy to be submitted as part of the planning application.

RTS routing options were explored as part of the Section 1 Local Plan RTS evidence base.

**Action:**

None

## 189

**Respondent:** Mrs Julie Young [146]

**Change suggested by respondent:**

The route of the RTS to enable a saving to be made available to ensure the link road is completed.

### Attachments:

Movement and Connections Response 1.docx - https://tcbgardencommunity.oc2.uk/a/m

## Object

**Summary of representations:**

TCBGC risks serious traffic congestion in Colchester because:
* the modal shift assumptions are too optimistic
* there is doubt about whether the second phase of the A120/A133 link road will be delivered
* there is confusion about the traffic modelling - does it include the link road or not?
* the costs of the link road and RTS have not been disclosed, nor have the full terms of the HIF agreement

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence (modelling and mode share) and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

Further transport assessment will be required as part of any future planning application, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

Building upon the information set out in the DPD evidence base, to assist the PT strategy to be submitted as part of the planning application.

Funding for the RTS and Phase 1 of the Link Road has been agreed between Essex County Council and Homes England who administer the Housing Infrastructure Fund.

**Action:**

None

## 195

**Respondent:** Mr William Sunnucks [113]

**Change suggested by respondent:**

Two new restrictions are needed in addition to those in the Section 1 plan:
i) No new housing can be started until both phases of the A120-A133 link road are started on site, and
ii) no dwellings can be occupied before the link road is completed and operational.

Colchester needs reassurance that it won't be forced to accept further compromises on infrastructure provision without proper discussion. The duty to co-operate was tested by the last minute phasing of the link road, and the City Council's frustration was expressed in the formal resolution passed (see my appendix 3).

**Attachments:** None

# Object

**Summary of representations:**

The DPD does not require the completion of the "Link Road" prior to housing development taking place. This must be a stipluation to ensure it carries out the fuction it is there for. The consultation page outlines: "The A120-A133 Link Road... is scheduled to open in 2026. Its objective is to support growth at the Garden Community, manage congestion in this wider locality and improve connectivity. " It simply will not meet Garden Community Policy requirements or requirements outlined in the planning permission if it is built in two phases and not completed before house-building commences.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.
The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K. The TA would need to set out the trigger point for when Phase 2 of the Link Road will be required.

Further transport assessment by the applicant will be required as part of any future planning application, with further details relating to the provision and operation the of RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

**Action:**

None

## 197

**Respondent:** Mr Mark Cory [147]

**Change suggested by respondent:**

The A120-A133 Link Road must be completed in full prior to house-building starting. Full road completion is a requirement to carry out its strategic and directly important role for the local road network, delivering on its purpose and policy objectives.

**Attachments:** None

# Object

**Summary of representations:**

The Link Road must be built prior to the housing development commencing

**Summary of representation changes to plan:**

None

**Response:**

Comment Noted. The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

Further transport assessment will be required as part of any future planning application, with further details relating to the provision and operation of the RTS to be established.

**Action:**

None

## 201

**Respondent:** Mr Phil Sadler [152]

**Change suggested by respondent:**

Change to plan:
The A120-A133 Link Road must be completed in full prior to house-building starting. Full road completion is a requirement to carry out its strategic and directly important role for the local road network, delivering on its purpose and policy objectives

**Attachments:** None

# Object

**Summary of representations:**

The DPD does not require the completion of the "Link Road" prior to housing development taking place. This must be a stipluation to ensure it carries out the fuction it is there for. The consultation page outlines: "The A120-A133 Link Road... is scheduled to open in 2026. Its objective is to support growth at the Garden Community, manage congestion in this wider locality and improve connectivity. " It simply will not meet Garden Community Policy requirements or requirements outlined in the planning permission if it is built in two phases and not completed before house-building commences.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K. The TA would need to set out the trigger point for when Phase 2 of the Link Road will be required.

Further transport assessment by the applicant will be required as part of any future planning application, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

**Action:**

None

## 203

**Respondent:** Liberal Democrats Colchester (Mrs michelle burrows, Local Cit Councillor) [151]

**Change suggested by respondent:**

The A120-A133 Link Road must be completed in full prior to house-building starting. Full road completion is a requirement to carry out its strategic and directly important role for the local road network, delivering on its purpose and policy objectives.

**Attachments:** None

# Object

**Summary of representations:**

Extremely worrying that DPD fails to mention extreme difficulties there are with the delivery of a link road. WTC do not see how it can still be considered the most appropriate site, or sustainable at all, without the link road and rapid transport system being proven as deliverable.
No confidence link road will be completed. There is no limit specified as to how many dwellings can be built before the completion of a link road. Original HIF grant application set out road network would not be able to sustain more than 1000 new homes without the road.
No guarantee will be delivered in an infrastructure first capacity.

**Summary of representation changes to plan:**

None

**Response:**

Comment Noted. The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The principle of development has been established by way of the adopted Section 1 Local Plan which under Policy SP6 requires planning consent and full funding approval for the Link Road to have been secured before planning approval is granted for any development at the garden community. There is no requirement for the Link Road to be completed before other development is commenced. Notwithstanding this, the impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K. The TA would need to cover requirements related to any 'trigger' for when Phase 2 of the Link Road will be required.

The position of the Link Road has already been established through an approved Planning Application. The Policy Map is consistent with consent granted.

**Action:**

None

## 232

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

**Change suggested by respondent:**

-

### Attachments:

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

# Object

**Summary of representations:**

DPD does not detail design and delivery of RTS. No evidence that planning consent and funding have been secured.
Not credible to suggest classed as rapid, no evidence quicker or cheaper than using car.
RTS fundamentally flawed as existing roads not big enough for bus lanes and car traffic.
No detail on how traffic priority can be given to the bus.
No link to university campus or local bus routes from Brightlingsea via Wivenhoe to Colchester, new residents travelling from Garden Community would not be able to interchange to local bus network. University students would not finance the RTS.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The Policy Map provides an indicative route for the RTS, the details of which would be determined at planning application stage through detailed masterplanning and design development, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

**Action:**

None

## 233

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

**Change suggested by respondent:**

-

### Attachments:

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

# Object

**Summary of representations:**

The traffic modelling acompanying the DPD replies on demonstrably unachievable modal shifts.
Question independence and accuracy of modelling (work completed by Ringway Jacobs who are under direct appointment to ECC)
No plan to mitigate determinetal impact to overzealous emphais on active travel will have on getting other traffic moving.
Little detail on what mitgation measures will be, it is impossibnle to comment on if they will have a postive impact.
A more direct RTS route to a junction opposite the current Knowledge Gateway would be more productive and pedestrain and cycle crossings for A133 should be provided via bridges.
Disappointed not willing to introduce intiatives.
Modal shift predictions can go badly wrong. Looking too far into the future is inadvisable. Figures in DPD (pg 95) not fully explained.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The DPD emphasises the importance of sustainable travel which reflects Garden City Principles and Section 1 Local Plan Policy SP6 requirements where the DPD needs to specify target mode share.

Mitigation measures and details related to mode share (including the figures detailed on page 95 of the DPD) form part of the DPD transport evidence base and the DPD GC Policy 7 outlines matters needing consideration.

The Policy Map provides an indicative route for the RTS, the details of which would be determined at planning application stage through detailed masterplanning and design development, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

**Action:**

None

## 242

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

**Change suggested by respondent:**

-

### Attachments:

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

# Object

**Summary of representations:**

To comply with Policy SP6.1 of Local Plan, DPD needs to give details of Route 1 (RTS).
Conflicting infromation on position of RTS stops.
Uncertainty of RTS line to Employment Areas.
Clarification needed on 'Express route' to north station and location of park and choose.
No clearly defined start date for RTS
Active travel comprised if sport pitches other side of A133 and link road being a through route.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery.

The Policy Map provides an indicative route for the RTS, the details of which would be determined at planning application stage through detailed masterplanning and design development, with further details relating to the provision and operation of the RTS to be established.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing a "target an operational model" for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

**Action:**

None

## 244

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

**Change suggested by respondent:**

-

### Attachments:

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

# Object

**Summary of representations:**

Colchester's roads have no spare capacity, already suffer from chronic congestion and gridlock are an everyday event.
DPD is unambitious re public transport
DPD heavily dependent on Active Travel. Cyclingto and from Colchester along A133 is not attractive proposition.
Greenstead roundabout is lethal.
City Centre is not cycle friendly.
DPD active travel modal shift for longer journeys are very unambitious at 10%. Multi modal journeys overlooked.
Walking and cycling to RTS stops will be easy enough but RTS will take 25 minutes to Colchester North, unlikely to be popular option for long distance journeys.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

The DPD emphasises the importance of sustainable travel which reflects Garden City Principles and Section 1 Local Plan Policy SP6 requirements where the DPD needs to specify target mode share. The impact of any development must be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

**Action:**

None

## 245

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

**Change suggested by respondent:**

-

### Attachments:

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

# Object

**Summary of representations:**

Concerns are raised around traffic Forecasting of Strategic Models. In particular, the phasing of development.

Traffic Forecasting of trips rates & mode shares.
Design and capacity of the new A120 junction.
Concerns over noise and air pollution from highway network on new development.

Concerns that drainage will be into the highway network system.

The base year CTM represents a 2019 Base Year and will reflect the pattern of trip making and travel behaviour that existed prior to the Covid-19 pandemic.

There are no detailed forecasts available to review and there has been no separate assessment of the traffic generated by the TCBGC proposals. Therefore, there is no information available in order to assess the impact of TCBGC on the highways network.

**Summary of representation changes to plan:**

None

**Response:**

Comments noted. A Statement of Common Ground is being prepared with National Highways and the Councils.

**Action:**

A Statement of Common Ground is being prepared with National Highways and the Councils.

## 265

**Respondent:** National Highways (Mr Mark Norman, Spatial Planner) [173]

**Change suggested by respondent:**

Further review of the evidence base work needs to be undertaken.
If the link road is to be delivered in two parts, impact on the highway network must be assessed for that time until the new junction is complete.
Proposed working with the Councils to address noise and air pollution issues. Consideration should be given for a bespoke Policy on noise and air pollution.
It is recommended that the advice on proportionate accounting for Covid 19 in prior calibrated models as set out in Appendix B of TAG M4 (Forecasting and uncertainty) issued in May 2023, should be taken into account to adjust the 2019 CTM matrices.

Forecasts prepared using CTM would require sensitivity testing to take account of the greater uncertainty arising from Covid-19.

When preparing forecasts from assessing TCBGC, to comply with advice set out in paragraph B2.3 of TAG M4 issued May 20223 sensitivity testing should be carried out to assess the further potential for change with respect to the long-term impact of Covid 19. This sensitivity testing should be carried out in line with best practice set out within DfT's Uncertainty Toolkit.

Further information is required on modelling. See representation for further details.

### Attachments:

National Highways Full Rep - https://tcbgardencommunity.oc2.uk/a/ts
Appendix 1 - https://tcbgardencommunity.oc2.uk/a/tt
Appendix 2 - https://tcbgardencommunity.oc2.uk/a/t3

# Object

**Summary of representations:**

- Over reliance on car journeys.
- Too much workplace parking in Colchester.
- Insufficient public transport.
- Insufficient explanation to current modal share figures, impact on local road and origins of TCBGC.
- No costs of RTS and insufficient detail of operation.
- Existing Park and Ride failed, Park and Choose will also fail.
- No evidence of current and predicted flows on other roads in vicinity of TCBGC.
- DPD non compliance with S1.Policy.SP6 (RTS).
- Contradictory of location of Park and Choose.
- Unsustainable financial position of RTS.

**Summary of representation changes to plan:**

None

**Response:**

The impact of any development will need to be appropriately mitigated, and this will be considered as part of a future planning application through the applicant's Transport Assessment, regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K. This would include a range of transport improvements/transport links within and beyond the site and the location/operation of Park and Choose.

Planning permission has been secured for relevant sections of the RTS outside of the Garden Community and for the full A133/A120 Link Road. Funding for both strategic infrastructure projects is through the Housing Infrastructure Fund (HIF) where £99m will secure the full RTS route and Phase 1 of the Link Road.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

**Action:**

None

## 271

**Respondent:** Mr Peter Kay [94]

**Change suggested by respondent:**

-

### Attachments:

Peter Kay - https://tcbgardencommunity.oc2.uk/a/tz

# Object

**Summary of representations:**

Reduction in local adult rail communting.
Rail companies no apetite to increase number of trains per hour
Local bus services pushed into crisis
DPD policy needs to be bases on realistic and achieable propositions and robust enough it cannot be watered down at planning application
Nothing in evidence to justify RTS will be quicker than travelling by car
Park and Choose new route will not have incentive to attract enough users
Traffic modelling assumes full modal change being achieved. Creates overly optimisic figures. 2033 to 2041 figures need reworking.

**Summary of representation changes to plan:**

None

**Response:**

Comments noted. Mitigation measures and details related to mode share (including the figures detailed on page 95 of the DPD) form part of the DPD transport evidence base and the DPD GC Policy 7 outlines matters needing consideration.

The TCBGC applicant will be required to submit a Public Transport (PT) Strategy in support of the Transport Assessment (DPD GC Policy 7, Part K). This PT Strategy will set out the detailed approach to the operation of the RTS and other local public transport services. Building upon the information set out in the DPD evidence base, to assist in the evaluation of the PT strategy to be submitted as part of the planning application, Essex County Council is developing an operational model for RTS which will set out the County's vision for how RTS should operate including frequencies and vehicle standards as well as considering short- and longer-term financial sustainability. The RTS service must be supported by infrastructure to ensure reliable journeys competitive with or faster than private cars for equivalent routes and this infrastructure is currently being delivered outside of the GC boundary. The developer is expected to deliver and fund connections into the offsite network.

**Action:**

None

## 243

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

**Change suggested by respondent:**

-

### Attachments:

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

# Object

**Summary of representations:**

Supports the principle of Chapter 8 which includes GC Policy 7, welcome the changes in language introduced since the Regulation 18 response across a number of key areas which provide flexibility as the design process evolves. Some objections remain, principally to assist with seeking to achieve the aims and objectives for the Garden Community through the planning application process, so that it is designed and built in a way that reduces the need to travel, especially by car; promotes sustainable travel modes and can adapt and respond to future transport challenges and emerging technologies such as connected and autonomous vehicles.

**Summary of representation changes to plan:**

Minor changes suggested to policy wording, to be resolved through SoCG and detailed in Schedule of Modifications.

**Response:**

Comments noted. The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base.

It is an important principle of the DPD that there will be filtered permeability between the neighbourhoods. The RTS and active travel modes are the priority, the wording the DPD is considered to be sufficiently flexible and further flexibility in how this will be achieved is not considered to be necessary.

Suggested removal of mode share targets table would be unacceptable given that this is a requirement of the S1 Local Plan. Review mechanisms for the DPD will allow this to be reviewed and updated based on developing evidence.

The provision of the RTS ready for operation during the first phase of development is to influence sustainable travel behaviour and embed the use of the system and align with the Essex RTS operational model including the phased delivery plan for services. The first phase must include an operational RTS to influence behaviour from the outset.

Upon further assessment some minor amendment to policy wording may be considered acceptable to provide additional clarity with regard to existing adopted lanes, reductions for car use over time, encouragement of sustainable travel patterns, RTS accessibility, parking design, alignment with evidence base and further modelling, and monitoring.

**Action:**

Statement of Common Ground is being prepared between the Councils and Latimer.

# 231

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

**Agent:** Lichfields

**Change suggested by respondent:**

The DPD and accompanying evidence base is unclear on the vehicular access for the Crockleford Neighbourhood, including the approach stated in GC Policy 1 and GC Policy 7, Part A. It is unclear from reading these policies alongside the transport evidence base (para 1 and 2) whether the Crockleford Neighbourhood is expected to have vehicular access to the new A120 – A133 Link Road and/or the Bromley Road. Parts of the Crockleford Neighbourhood to the north of Bromley Road will require vehicular access from Bromley Road, however there are some references in the DPD to Bromley Road being a sustainable movement / active travel corridor only, which could restrict the use of Bromley Road and have an impact on existing homes and businesses as well as homes further north of the A120. It is important that the evidence base and policy wording across the DPD is clear and consistent on this point to identify a feasible strategy for movement to, from and within Crockleford and Bromley Road in the DPD. This will also enable the sustainable transport strategy required to support the Crockleford Community to be developed through the planning application.
Recommended detailed wording changes to the draft DPD text are provided at Appendix 3 of the attached document.

## Attachments:

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

## GC Policy 7. Movement and Connections

# Object

**Summary of representations:**

- Opportunity to strengthen policy and supporting documents – where there's potential to remove text saying "where appropriate" or "where necessary and appropriate"
- The transport evidence base documents would benefit from text or pointers to other documents to show expected RTS journey times to other destinations, given the importance afforded to this infrastructure. How long does modelling show RTS from TCBGC to eg University of Essex, Hythe station, City Centre, Colchester station, General Hospital, Severalls Business Park?

**Summary of representation changes to plan:**

Modification suggested to GC Policy 7, Part C:
Replace 'bus service' with 'public transport'

**Response:**

The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base including transport evidence and infrastructure provision, phasing and delivery. The principle of development has been established by way of the adopted Section 1 Local Plan. The DPD requires the applicant to prepare a detailed Transport Assessment, and impact mitigation will be required and secured as part of any future planning application, having regard to the DPD transport evidence base and the full range of transport related planning application requirements detailed in DPD GC Policy 7, Part K.

The policy is considered sound and sufficiently flexible secure appropriate facilities and mitigation over the life-time of the development in the long term. However, upon further assessment the Councils consider that a proposed change to the DPD could be appropriate as suggested in reference to GC7, Part C Public Transport.

**Action:**

Modification suggested, add to Schedule of Modifications.

## 131

**Respondent:** Mr TIM BATTS-NEALE [131]

**Change suggested by respondent:**

Attachment comments set out requests to generally: clarify text and assumptions in transport evidence reports including modelling; and proposing updating wording in DPD policies and justification.

### Attachments:

DPD Submission Version comments All Tim Batts-Neale.docx - https://tcbgardencommunity.oc2.uk/a/v