32 Object

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE

Respondent: Mrs Pam Cowell [56]

Summary:

The air pollution will become intolerable to many of our village (Elmstead) with medical problems.

Full text:

comments re new development

The New development has been prepared with out thought on how the infrastructure is going to be available, we are struggling at the moment to live and get medical treatment as the hospitals and doctors are over whelmed with no capacity to treat the population as it is.
The village of Elmstead which has nothing but one shop and over subscribed doctors and not much else.
This project has been badly thought up it does not help normal people with housing ,just greedy builders who are jumping on the band wagon to build houses that the majority cannot afford. No thought has gone into how our village can manage with the volume of traffic when most local people have to travel to gat any medical treatment shopping and other important essentials availability to better their lives. The village has already grown to twice its size with new homes.

Elmstead will become out cast from all these things that are necessary to survive. The air pollution will become intolerable to many of our village with medical problems. 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 re 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.

These buildings are not for the local populous but for out siders who have no empathy with the way of life that we have all struggled to achieve in our small village good quality of life and a peaceful existence., good air quality. We are aware that things need change but Colchester has built so many house without any more hospitals schools dentists and doctors as it is we have to wait 5/6 weeks for a doctors appointment and with what is proposed now with out realistic management for all is abominable, no thought of how our village can cope with this distraction of our way of life.

Education will not be available to all children as there are no places for them as no extra schools are being built this again is unacceptable the impact of the population is not possible as no thought has gone into the extra land available for the infrastructure it is madness to continue in this unthought out plan. Colchester will spread making us an urban jungle.

This can not be allowed to continue with no thought on how people can survive with out adequate hospitals doctors schools etc this cannot be allowed to go on without some sensible input and constructive thinking ,councillors can not just do as they please forgetting the people that have paid their taxes supported the councils all these years to be brushed aside.
This is insane thinking without a proper constructive plan to help all without out destroying our way of life.
Government have no idea as to what they want regarding more homes no thought about quality of life. It will cause over crowding and no infrastructure to cope with the rise in the populous. The health of the area will become impossible with no health care available as there will be no capacity in the one hospital that is suppose to serve all.

Change suggested by respondent:

-

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

71 Support

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE
Respondent: Sport England (Mr Roy Warren, Planning Manager) [90]

Summary:
The policy is supported in relation to its approach to requiring developers to make provision for infrastructure which will include sport as provision is made for both on-site and off-site provision to be made which is likely to be necessary for sport.

Full text:
The policy is supported in relation to its approach to requiring developers to make provision for infrastructure which will include sport as provision is made for both on-site and off-site provision to be made which is likely to be necessary for sport.

Change suggested by respondent:
-

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

75 Object

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE
Respondent: Mrs Sasha Phillips [91]

Summary:
'A PLACE DESIGNED FOR THE IMPACTS WHILE MINIMISING ITS CONTRIBUTION TO CLIMATE CHANGE'
More cars on the road, more time spent in traffic = more pollution!!
The destruction of nature, ploughing up a whole area of agricultural and grassland to make way for houses and concrete roads= releasing into the atmosphere heat-trapping carbon dioxide that plants, trees, and soil stored safely.
This is not minimising the contribution to climate change!

Full text:
'A PLACE DESIGNED FOR THE IMPACTS WHILE MINIMISING ITS CONTRIBUTION TO CLIMATE CHANGE'
More cars on the road, more time spent in traffic = more pollution!!
The destruction of nature, ploughing up a whole area of agricultural and grassland to make way for houses and concrete roads= releasing into the atmosphere heat-trapping carbon dioxide that plants, trees, and soil stored safely.
This is not minimising the contribution to climate change!

Change suggested by respondent:
Significantly reducing the amount of housing!

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

80 Object

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE
Respondent: Mr Michael Watson [85]

Summary:
- Policy on grey and black water treatment is lacking.
- Concern due to odour emitted from the sewage works by The Hythe.
- Water / air pollution for the local residents of Elmstead and Crockleford Heath.
- Importance of identifying the means and method for the treatment of these waste water types at DPD stage, so they can be properly costed and prepared in advance of any building.
- Policy on sewage and water is missing.
- Major road disruption during pipe-work installation to link to at the groundwork stage.

Full text:

I oppose the building of the Garden Village on the Colchester / Tendering borders on the grounds listed below.
1. Infrastructure
2. Water Treatment
3. Salary Brook boundary
4. Rapid Transport System
5. Housing
6. Gypsy / Traveller site

1) Concerns have been raised that no infrastructure being in place during the first stages of the development. There is not enough social, health or education provision initially planned. The report says these views have been taken on board but the consultation document does not address the concerns raised in any depth.
Within the Community and Social infrastructure assets at the earliest stage of development, (for each development) there should be essential requirements for:
* Early years and nursery provision
*Primary school(s)
*Secondary school
*Dentist, GP surgery, Pharmacy and clinical facilities offering out-patient support that cannot be provisioned at Colchester General Hospital
*A Community multi-use building with sufficient self-contained spaces within it to accommodate use by different faith groups, clubs and societies, including youth clubs
The suggestion that an initial 100+ houses may be required to begin funding the project before any infrastructure begins is alarming and directly in contradiction to the local plan.

2) There is a gap in terms of lacking a policy on grey and black water treatment specifically. This being of particular concern because of the odour emitted from the sewage works by The Hythe.
The problems of water and air pollution for the local residents of Elmstead and Crockleford Heath caused by the building of up to 9,000 accommodation units. There is the importance of identifying the means and method for the treatment of these waste water types at DPD stage, so they can be properly costed and prepared in advance before the commencement of any building.
Currently any policy as to how sewage and water will be dealt with is missing; in view of the final size of the garden community development, surely there is a vital need to deal with this essential part of the infrastructure right at the start.
There is the problem of major road disruption, in an already heavily traffic congested area, for the whole of the East of Colchester during the pipe-work installation to link to at the groundwork stage.

3) In the area of the suggested Knowledge Gateway / Industrial expansion, there is a concern that the proposed development could end up spilling halfway down the Salary Brook slopes designated as country park area, which is at best a meagre offering of habitat for the size of the area to be desecrated. This would be a contradiction of two other agreed principles based on community and public input into the engagement process.
Building on the ridgeline would cause buildings, not in character with a country park, to dominate these slopes and the whole surrounding landscape. The buildings would have a detrimental effect and be viewable from great distances, ie The University Towers.

4) The description of the route of the Rapid Transit System (RTS) connecting the Garden Community with the rest of Colchester is too vague in stating “it will be in place to connect the Garden Community with the University of Essex, Colchester Town Centre, Colchester Railway Stations, Colchester Hospital, Community Stadium, Colchester Sports Park and the existing Park and Ride site in north Colchester”. Prospectively, the buses will always be in traffic struggling through bottlenecks at railway and river crossings from the East of Colchester right into the town. In the documents, there are no plans to address these points by building new bridges or underpasses.
There is no current map provided to indicate the exact route, therefore leaving the developers open opportunity to place the road at their discretion. We need a clear definition of the route and identification of the bottlenecks and costings for resolving them. There is no current indication of how the RTS will actually be paid for; except for the developer stating a (non binding) certain amount of houses will have to be sold first, to allow for the building of the RTS.
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, leading onto trade vans and domestic cars passing through the village of Elmstead and the adjoining back-roads for many years.
5) Affordable Housing Phasing: The public should have a definitive statement stipulating that the 30% affordable housing rule should apply at all stages of the development. Planning permission stage, housing starts and housing occupation. Otherwise the developers would use an “Affordable Housing Phasing Strategy” to justify the late delivery, or diminished quantity of affordable housing.
Accordingly, all ‘Affordable Housing’ should be first offered to locally living residents affected by the development; followed by Front line / Blue Light workers.
6) Within the guidelines of Gypsy and Traveller needs: the size of the gypsy and traveller provision is to be determined as part of Gypsy and Traveller Needs Assessment.
How are the developers and council going to deal with this issue?
Where is this site to be placed as it has not been shown in the context of the planners outline permission. The site needed would be very big in relation to the GC; and at what stage would this ‘mini development’ take place.

Change suggested by respondent:

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

Legally compliant: Yes
Sound: No
Comply with duty: No
Appear exam: Written Representation
Attachments:

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

93 Object

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE
Respondent: Mr David Mead [27]

Summary:

• This policy is commendable but does not seem to be reflected in in the design requirements for buildings in the GC.

Full text:

Compliance:
I consider that the Development Plan Document is Legally compliant.
It is not sound for the reasons stated below.
I consider that the document complies with the statutory duty to co-operate, but the consultation process using the engagement website is overly complex and biased. It seems likely that many people will have been deterred from participation in the consultation by these arrangements.

I would be pleased to participate in the oral part of the examination if this would be of assistance.

GC Policy 1: Land Use and Spatial Approach.

• The Garden Community Principles unproven. The GC vision overly aspirational and adopts a naive perception of the way in which communities are established and of human behaviour. The latter is not simply determined by environment.
• The GC is unlikely to address a local housing need, unless a greater proportion of rented housing is included. The present proposed approach will encourage further migration from the London suburbs, by the property wealthy whose pattern of work has changed post Covid-19.
• Many prospective residents of the GC will not be seeking local jobs, they will be occasionally commuting to London and working from home.
• Unrealistic assumptions are made in relation to the extent to which private car usage will be reduced by the RTS and other more sustainable transport initiatives.
• The practicalities of community ownership are unclear.
• Shared ownership and rented housing should be included in the DPD as separate categories and the possibility of transferring from rent to shared ownership should be included.
• I was told at a consultation event that environmental requirements for new homes cannot exceed current building regulations, this is not clear from the DPD, which suggests the environmental requirements will be much higher.
• The neighbourhood map does not clearly distinguish between the North and Crockleford neighbourhoods.
• The development of the TCBGC does not justify the concreting over of a large part of rural northeast Essex.
• It does not seem logical that two proposed garden communities in north Essex were not considered to be viable, while the TCBGC is considered viable.

Policies Map:

• The need for 7,500 new homes in north Essex is not clearly established.
• A development on the Bromley Road has recently been curtailed because the developer's expectation of potential sales has been reduced. Properties have also been sold to a London Borough to house homeless families.
• 1,000 to 1,500 new homes on Crockleford Heath will adversely impact on the special character of the area.
• The need for Knowledge Based Employment Land is not established, many the existing units at the University for Knowledge Based Employment remain vacant.
• The need for provision for Gypsies and Travellers is not supported by evidence.
• The term Green Links is not clearly defined. Are these for wildlife or walkers and cyclists? How wide are these corridors? A minimum of 100m may be appropriate.
• While Wivenhoe and Elmstead are provided with Strategic Green Gaps, why is no Green Gap provided for Crockleford Heath to preserve the special character of the area?
• The present proposals suggest that housing development to the south of the Bromley Road will encroach on Crockleford Heath. A Green Gap of at least 100m may be appropriate. Alternatively, given the high volume of traffic it may be appropriate not to develop any housing to the immediate south of the Bromley Road.

Policy 2: Nature.

• Nature and biodiversity are likely to be enhanced if housing development does not proceed.
• It is not clear how the safety of public spaces will be assured, and anti-social behaviour managed.
• Churn Wood is shown on the Framework Plan, but it is not made clear this is privately owned and does not have public access.
• What is an edible walkway – a licence to steal apples?
• How will community gardens be managed and maintained? If this is not clear these areas could become a focus for anti-social behaviour.
• This chapter of the DPD demonstrates an idealised and unrealistic approach to the relationship between people and nature. Many of the prospective residents of the GC may have little experience and knowledge of nature and little desire to develop such knowledge.

Policy 3: Place Shaping Principles.

• This chapter is commendable, but highly aspirational. It is not clear how quality of life, livability, equitable prosperity, and social cohesion are to be achieved in practice.
• Communities are not created by distinctive buildings. It is difficult to envisage that the TCBGC will not simply be another large housing development.
• There is a limit to which environment can have a positive impact on societal behaviour and crime can be designed out. Crime is a variable feature of human behaviour. It also reflects the quality and level of policing and other factors.

Policy 4: Meeting Housing Needs.

• There has been significant housing development around Colchester in recent years. Predominantly this has not met a local housing need, but has fuelled movement of people from other areas, particularly London It is difficult to imagine that if it proceeds the TCBGC will not have a similar pattern of home ownership.
• Residents on low income are likely to seek rented housing, from a provider of social housing and in this respect the chosen developer may be well placed to meet this need.
• To conflate shared ownership and rented housing in 30% figure for affordable housing is misleading. A greater proportion of rented housing may be necessary to meet local need.

Policy 5: Economic Activity and Employment.

• The objective of achieving one job per household in or near the garden community may be ambitious and will be dependent on factors such as the overall economic picture.
• It seems likely that a significant proportion of prospective residents will be employed in London and working remotely from home some of the time.

Policy 6: Community and Social Infrastructure.

• This section of the DPD is highly aspirational. Dependent upon the level of stewardship and management, what may emerge in practice could be very different.
• It is not clear whether multifunctional community buildings include the provision of healthcare services. This may be difficult to achieve in practice, given specialist medical needs.
• Management and longer-term stewardship of community provision of this nature could be clearer in DPD.

Policy 7: Movement and Connections.

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

Policy 8: Sustainable Infrastructure.

• This policy is commendable but does not seem to be reflected in in the design requirements for buildings in the GC.

Change suggested by respondent:

-

Legally compliant: Yes
Sound: No
Comply with duty: Yes
Appear exam: Appearance at the examination
Oral exam why: I would be pleased to participate in the oral part of the examination if this would be of assistance.

Attachments: None

99 Object

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE

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

Summary:

Change requirement for minimum 110 l/p/d to 100l/p/d
Include requirement for applicants requiring significant non-domestic water supply to submit a Water Resource Assessment in consultation with the relevant water company. This will look at maximising water efficiency and water reuse.

Full text:

Affinity Water supports the Plans positive messaging regarding water efficiency and opportunities for water reuse. However, GC Policy 8 refers to the 110 litres per person per day. A well planned development which incorporates water reuse systems can achieve less than this.

Due to the location of the development supply may be limited without substantial reinforcements. The area is subject to sustainability reduction plans which adds complexity to supply.
We believe that the government's Environment Improvement Plan (Water Efficiency Roadmap) intention to require 100 l/p/d in water stressed area, such as this, should be used as a minimum requirement and developers encouraged to demonstrate how utilising integrated water management and a fittings based approach will reduce potable water use.

It is worth noting that Affinity Water has a statutory duty to supply water for household purposes, including any domestic requirements for non-household buildings (e.g drinking water and toilets in offices). This statutory duty does not extend to non-domestic demand, such as industrial processes, where it compromises our ability to supply for domestic purposes. We therefore request developers/applicants for non-domestic use liaise with us looking at water reuse and efficiency measures.

Change suggested by respondent:

Affinity Water propose a criteria based approach that is proportionate to new non-household developments that requires applicants to demonstrate water efficiency measures and water reuse have been incorporated in proposals.
Where significant non-domestic water use is required developers should be required to submit a Water Resource Assessment with the planning application following consultation with the relevant water company.

The requirement of 110 l/p/d should be replaced with 100 l/p/d

Garden Communities are exemplars of sustainable and resilient development and should push boundaries to demonstrate that positive steps can be taken to deliver smarter and more efficient designs

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

113 Support

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE

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

Summary:

GC Policy 8, Part I (page 120). The justification for GC Policy 8 and Part E states it is essential to demonstrate how the proposed planting palette includes adaptable/resilient plant species. It then states that details should be submitted as part of the application of appropriate biosecurity standards for sourcing, quarantining, and inspecting plant material supplied to the development. To ensure consistency and clarity, Part I should reiterate the need for this to be set out in the Green and Blue Infrastructure Plan.

Full text:

GC Policy 8, Part I (page 120). The justification for GC Policy 8 and Part E states it is essential to demonstrate how the proposed planting palette includes adaptable/resilient plant species. It then states that details should be submitted as part of the application of appropriate biosecurity standards for sourcing, quarantining, and inspecting plant material supplied to the development. To ensure consistency and clarity, Part I should reiterate the need for this to be set out in the Green and Blue Infrastructure Plan.

Change suggested by respondent:

-

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

115 Support

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE

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

Summary:

ECC welcomes that the Essex Climate Action Commission (ECAC) is mentioned in the justification. The Garden Community is situated within the ECAC's recommended Climate Focus Area (CFA), which is formed of the Blackwater and Colne River catchment areas. The principal objective of the CFA is to become net zero carbon and the GC can contribute to the CFA targets. Accordingly, the Policy Justification can include a new sentence at the end of the second paragraph to state this.

Full text:

ECC welcomes that the Essex Climate Action Commission (ECAC) is mentioned in the justification for GC Policy 8 on page 121. The Garden Community is situated within the ECAC's recommended Climate Focus Area (CFA), which is formed of the Blackwater and Colne River catchment areas. The principal objective of the CFA is to become net zero carbon – meaning that the amount of carbon emitted from the area is no higher than that absorbed. The GC can contribute to the CFA targets.

Accordingly, the Policy Justification can include a new sentence at the end of the second paragraph.

"It should also be noted that the Garden Community is located with the ECAC Climate Focus Area (CFA). The principal objective of the CFA is to become net zero carbon – meaning that the amount of carbon emitted from the area is no higher than that absorbed. The Garden Community can contribute to the CFA targets."

Change suggested by respondent:

-

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

123 Object

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE

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

Summary:

Anglian Water welcomes the policy focus on water conservation and wastewater, but considers that the policy should be more representative of the North Essex Authorities Shared Strategic Plan policy requiring delivery of a smart, innovative and sustainable water efficiency and reuse solutions that foster climate resilience and forward looking approach to water supply, water and wastewater treatment. We propose introduction of new policy text for water efficiency and reuse given the scope for, and policy drivers to deliver rainwater/stormwater harvesting and reuse and greywater recycling, to move beyond the optional higher water efficiency standard of 110 litres/person/day (l/p/d).

Full text:

Anglian Water operates in the driest and flattest part of the country, making it particularly vulnerable to the impacts of climate change. As these impacts become more frequent and severe, water scarcity, environmental capacity and flood risk are increasingly important. The Garden Community is within an area identified as seriously water stressed1 which applies both to the natural environment and to public water supplies. Both will be affected by pressures arising from climate change and additional demands associated with new development and population growth. Public water supplies are also under pressure from reductions in abstraction to make them more environmentally sustainable. The Environment Agency (EA)'s abstraction reduction strategy is therefore essential for the health of our environment, but it does present some challenges as changes have been made to the EA's approach since the last Anglian Water water resources management plan (WRMP19).

Anglian Water develops a revised WRMP every five years setting out how water supplies will be managed to meet our future needs, ensuring our customers remain on resilient water supplies and preventing deterioration to the environment. A twin track approach was developed for WRMP19 (2020- 2045) for demand management and increasing supply, which together ensure our customers have a resilient, safe supply of water. Anglian Water's draft Water Resources Management Plan 2025-2050 (dWRMP24) outlines that the two reservoirs planned for Lincolnshire and Cambridgeshire are no-regret supply options. However, given the considerable planning, construction, and filling time-frames for these projects, even with the significant early work done, we will have a short-term regional deficit until the reservoirs are in supply. The Essex South water resource zone (WRZ) is based on the supply systems for Colchester and Braintree with water supplied from a combination of groundwater abstractions in the Essex Chalk Aquifer. The deployable output of water resources in this WRZ reduces by 30.7 Ml/day by 2050; driven by abstraction reductions and climate change, as our demand management strategy will offset growth in the region via our water metering programme, leakage reduction and water efficiency measures. In addressing the shortfall of water, a new supply-side option is required before the reservoirs are available. With little to no opportunity to utilise any surplus ground or surface water, the dWRMP24 identifies the need for a water reuse plant in Colchester, with other preferred supply side options including potable water transfer and desalination.

Anglian Water notes that the North Essex Authorities Shared Strategic Section 1 Plan (2021) Spatial Policies 8 and 9 refer to water resources and wastewater within the garden community that refer to the delivery of a smart, innovative and sustainable water efficiency and reuse solutions that foster climate resilience and forward looking approach to water supply, water and wastewater treatment. Anglian Water recognises the relevant policies within the respective Tendring District and Colchester City Section 2 Local Plans regarding flood risk, provision of drainage/sewerage and water efficiency measures. However, we consider that the TCBGC plan should reflect the aims of the Section 1 Local Plan in identifying measures that incorporate the highest standards of innovation in these areas which are reflective of Garden City Principles in terms of resource use and delivering a climate resilient large-scale new community2.

The Integrated Water Management Study Phase 2 (IWMS2) sets out water neutrality scenarios which extend from the baseline position of average per capita consumption to the adopted policy position in the Section 2 Local Plans of the 110 litres per person per day (l/p/d) optional higher standard with some retrofits, and theoretical neutrality. There is no scenario which takes an intermediate position to reflect the more ambitious approach set out in the North Essex Section 1 Local Plan policy approach for highest standards in innovation for water efficiency.

Whilst Anglian Water is supportive of the measures introduced by this policy we propose that the plan should introduce new policy text for water efficiency and reuse given the scope for, and policy drivers to deliver rainwater/stormwater harvesting and reuse and greywater recycling, meaning that the requirement of the optional higher water efficiency standard of 110 litres/person/day (l/p/d) can be more ambitious. Anglian Water suggests that the government's Environment Improvement Plan (Water Efficiency Roadmap) intention to require 100 l/p/d in water stressed areas should be used as a minimum with developers required to meet this and encouraged to demonstrate how they can go further utilising integrated water management and a fittings-based approach to minimise potable water use.

Anglian Water has a statutory duty to supply water for domestic purposes including any domestic requirements of non-household properties (e.g., drinking water, hand-basins, toilets and showers). In many cases, domestic demand will be the only requirement for many non-household properties. Non-domestic demand refers to water use for industrial processes, (e.g., agri-food production or car washes), and there is no legal requirement for us to supply for this type of water usage where it might put at risk our ability to supply water for domestic purposes. Although Anglian Water do not have a statutory obligation to supply for non-domestic purposes in these circumstances, we factor this into our WRMP and we do everything we can to support businesses in the region, with the help of the water retail market. However, as described above, the situation is now changing, due to water supply being squeezed by abstraction reduction, climate change and a fast-growing population. Therefore, where new and unplanned non-domestic requests are received, there might be the need to decline requests to protect existing supplies and the environment.

Anglian Water would therefore propose that the policy clearly directs a criteria-based approach that is proportionate to new non-household developments and requires applicants to demonstrate water efficiency measures and water reuse have been incorporated in proposals. Where significant non-domestic water use is required, developers should be required to submit a Water Resources Assessment with the planning application following consultation with the relevant water company to ascertain water availability and feasibility of the proposed scheme.

Anglian Water recommends that the proposed approach for residential properties and non-household development is incorporated in the Plan as steps need to be taken now to future proof new homes that are coming forward in the next five years and assist business to be more water efficient. Garden Communities are exemplars of sustainable and resilient development and should push boundaries to demonstrate that positive steps can be taken to deliver smarter and more efficient designs.

Anglian Water with the Environment Agency and Natural England are updating a Joint Protocol which has supported the majority of the 59 Councils across the Anglian Water region to adopt or be in the process of adopting a Policy requiring a 110 l/p/d water efficiency standard for all new homes. The updated Protocol will seek a water efficiency standard which goes beyond 110 l/p/d and seek water efficiency in new and expanding business. This will be through a combination of improved fixtures and fittings, education and support underpinned by Anglian Water's smart metering roll out.

Change suggested by respondent:

Anglian Water suggests that the government's Environment Improvement Plan (Water Efficiency Roadmap) intention to require 100 l/p/d in water stressed areas should be used as a minimum water efficiency standard with developers required to meet this and encouraged to demonstrate how they can go further utilising integrated water management and a fittings-based approach to minimise potable water use.

We propose that the policy clearly directs a criteria-based approach that is proportionate to new non-household developments and requires applicants to demonstrate water efficiency measures and water reuse have been incorporated in proposals. Where significant non-domestic water use is required, developers should be required to submit a Water Resources Assessment with the planning application following consultation with the relevant water company to ascertain water availability and feasibility of the proposed scheme.

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

142 Support

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE
Respondent: Rev Pauline Scott [136]

Summary:

Absolutely essential that this new community is built to the highest eco standards. I trust that gas will not be connected to the site as this would be short sighted.

Full text:

Absolutely essential that this new community is built to the highest eco standards. I trust that gas will not be connected to the site as this would be short sighted.

Change suggested by respondent:

-

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

158 Object

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE

Respondent: Mrs Susan Burns [69]

Summary:

Once again the comment that residents will have much reduced need to travel. This is beyond ridiculous, most people travel everyday and not just on routes served by public transport ! I believe it's time to accept that carbon emissions will increase massively, low emission boilers, cars and other household environs, will increase considerably. The convenience factor will far outstrip the idealistic notion of a carbon zero way of life. Nobody is going to travel on maybe two buses to their destination when your car is parked on the drive!

Full text:

Once again the comment that residents will have much reduced need to travel. This is beyond ridiculous, most people travel everyday and not just on routes served by public transport ! I believe it's time to accept that carbon emissions will increase massively, low emission boilers, cars and other household environs, will increase considerably. The convenience factor will far outstrip the idealistic notion of a carbon zero way of life. Nobody is going to travel on maybe two buses to their destination when your car is parked on the drive!

Change suggested by respondent:

Drastically reduced. More realistic expectations need to be factored in to this idealistic dream.

Legally compliant: No

Sound: No

Comply with duty: No

Appear exam: Written Representation

Attachments: None

171 Support

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE

Respondent: Mr Andrew Scott [141]

Summary:

Approach seems sensible. Need to ensure that planning permissions have the clout needed to ensure that the intentions set out are delivered.

Full text:

Approach seems sensible. Need to ensure that planning permissions have the clout needed to ensure that the intentions set out are delivered.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Appear exam: Not specified

Attachments: None

186 Object

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE

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

Summary:

- Question intention behind the illustrative plan

Part A
- Need to assess how homes will continue to met standards for a set period of time after construction.
- Schools and business premises must also have energy efficiency requirements.
- Ineffective language.

Part B
- 'Encouraging' is imprecise language that means policy is ineffective.

Part C
- 'where feasible' makes policy is too weak.

Part D
- Poor wording about water efficiency calculator report.

Justification
- 1.5C target is expected to be broken in 2027 – not a valid justification for policy.

Full text:

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

Change suggested by respondent:

Part A
- Energy efficiency standards for non-domestic buildings required.

Part B
- Passivhaus standard should be compulsory.

Part C
- Stronger wording required for policy to be effective.

Part D
- Change word 'should' to 'shall'.

Legally compliant: Yes

Sound: No

Comply with duty: No

Appear exam: Appearance at the examination

Oral exam why: It is necessary for the Parish Council to represent its community.

Attachments:

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

199 Support

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE
Respondent: Mr Mark Cory [147]

Summary:

I support the net-zero carbon objectives and policy requirements.

We should go further in the following areas:
Part D - Water Conservation - I believe with the evidence of water supply and climate effects locally we must update the policy from optional water consveration to complusory greywater and rain harvesting systems.

Part J should be created to make a requirement upon the highest insulation standards to conserve energy, beyond current Building Regulation stipulations.

Full text:

I support the net-zero carbon objectives and policy requirements.

We should go further in the following areas:
Part D - Water Conservation - I believe with the evidence of water supply and climate effects locally we must update the policy from optional water consveration to complusory greywater and rain harvesting systems.

Part J should be created to make a requirement upon the highest insulation standards to conserve energy, beyond current Building Regulation stipulations.

Change suggested by respondent:

-

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

202 Object

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE
Respondent: Mr William Sunnucks [113]

Summary:

The financial cost of the sustainable infrastructure requirements doesn't appear to have been considered properly. And the cost of upgraded the Colchester Waster Recycling Centre appears to have been forgotten.

Full text:

Policy GC8 – Sustainable infrastructure
Part L and F build costs: 10% has been added for extra Part L and F build costs in the Gerald Eve Housebuilder appraisal (page 34). I am pleased that there is some recognition of the cost burden of GC Policy 8 but the figure needs better justification. It is at the heart of the Garden Community concept and will have a major impact on viability. Gerald Eve themselves state that “this is an area that requires further clarity”.

Wastewater Treatment: it is clear (from the Integrated Water Management Plan supporting this DPD) that an upgrade to the Colchester Wastewater Recycling Centre is required for the garden community. It appears that Anglian Water have no plans to do the work and that there is no specific plan or funding for the work to be done from TCBGC s106 contributions (I can’t find anything specific in the IDPFP or in the viability appraisal). Instead there is mention of negotiating increased discharges, a matter of significant concern to residents.

Change suggested by respondent:

It may be necessary to review GC8 and make compromises to reduce build cost which is currently in the model at £94m.

A costed and phased plan for Colchester Wastewater Recycling Centre upgrade should be included in the financial appraisal.

Legally compliant: Yes
Sound: No
Comply with duty: Yes
Appear exam: Appearance at the examination
Oral exam why: I may be able to help the Inspector with the viability issues surrounding sustainable infrastructure.
Attachments: None

221 Support

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE
Respondent: Environment Agency (Mr Giles Ward, Planning Officer) [165]

Summary:
- Note that previous comments specifically on 'a water efficiency calculator report' have been taken on board. Therefore have no further detailed comments to make in relation to this plan.
- Comments submitted on flood risk and foul drainage capacity.

Full text:
See attachment

Change suggested by respondent:
-

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments:
Environment Agency - https://tcbgardencommunity.oc2.uk/a/sd

234 Object

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE
Respondent: Latimer (Tendring Colchester Borders Garden Community) Developments Limited [127]
Agent: Lichfields (Miss Charlotte Walker, Planner) [124]

Summary:
Generally, Latimer support the Councils' aspirations and expectations for creating a community fit for the future and which embraces Garden Community principles and incorporates measures aimed at tackling climate change, minimising carbon emissions and climate change adaptation. However, a few points of clarification and wording amendments are suggested within the representations, relating to Net Zero Carbon, Design and Construction.

Full text:
See attachment

Change suggested by respondent:
- Part A of GC Policy 8 has been expanded upon, and requirements are now more detailed. As such, the wording should make it clear that this is because the Garden Community will be 'aspirational' in achieving net zero carbon and make reference to advances in Building Regulations.
- Recommend the removal of reference to a District Heating Network.
- Latimer fully supports the potential that renewable energy could be provided in the Strategic Green Gaps ('SGG'). However, there is different language used to describe allowable development in the SGGs. The Wivenhoe SGG refers to "renewable energy"' whereas the Elmstead SGG refers to "low carbon energy generation". Renewable energy generation will be critical to supporting a resilient community but there should be an aligned approach to terminology to provide a consistent strategy for future planning applications to follow.

Legally compliant: Not specified
Sound: No
Comply with duty: Not specified
Appear exam: Appearance at the examination
Oral exam why: Developer
Attachments:
Latimer Reps - https://tcbgardencommunity.oc2.uk/a/sp

246 Object

Document Element: GC POLICY 8: SUSTAINABLE INFRASTRUCTURE

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

Summary:

Disappointed this chapter is not driven by bespoke design code.
Lacks ambition of setting high standards of envrionmentally sound building conditions
Too much reliance that developer would choose to build at a higher spec than already set by legislation
No caveat to conform to future new policy or locally set standards through project lifetime
All power generated should come from green energy. Opportunity to focus on climate emergency.

Full text:

See attached letter for full text

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Appear exam: Appearance at the examination

Oral exam why: WTC councillors request that they can make representations at the Hearing.

Attachments:

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