GC POLICY 8: SUSTAINABLE INFRASTRUCTURE

RE8

Support

Summary of representations:

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.

Summary of representation changes to plan:

None

Response:

Support Noted

Action:

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

71

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

Change suggested by respondent:

-

Attachments: None

Support

Summary of representations:

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.

Summary of representation changes to plan:

None

Response:

Support Noted

Action:

None

142

Respondent: Rev Pauline Scott [136]

Change suggested by respondent:

-

Attachments: None

Support

Summary of representations:

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

Summary of representation changes to plan:

None

Response:

Support Noted

Action:

None

171

Respondent: Mr Andrew Scott [141]

Change suggested by respondent:

-

Attachments: None

Support

Summary of representations:

- 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.

Summary of representation changes to plan:

None

Response:

Support Noted

Action:

Statement of Common Ground prepared between Environment Agency and the Councils.

221

Respondent: Environment Agency (Mr Giles Ward, Planning Officer) [165]

Change suggested by respondent:

-

Attachments:

Environment Agency - https://tcbgardencommunity.oc2.uk/a/sd

Support

Summary of representations:

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.

Summary of representation changes to plan:

Ref to be made to the Government's Environment Improvement Plan (Water Efficiency Roadmap) standard of 100 litres per person per day.

Response:

Support and comments noted. The policy is considered sound, however, upon further assessment and following discussions with Anglian Water and Affinity Water, the Councils consider that a proposed change to the DPD could be appropriate with regard to minimum water efficiency standards in line with the government's Environment Improvement Plan and in light of water stressed area. Further changes suggesting strengthening of policy on greywater and rain harvesting systems are not considered necessary or reasonable.

Comments noted with regard to insultation standards, the Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base. Insufficient evidence available to justify going beyond Building Regulations in this instance.

Action:

Modification suggested in Schedule of Modifications.

199

Respondent: Mr Mark Cory [147]

Change suggested by respondent:

-

Attachments: None

Support

Summary of representations:

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.

Summary of representation changes to plan:

Additional text to be added to policy justification to make reference to the Climate Focus Area (CFA).

Response:

Support and comment noted. The policy is considered sound, however, upon further assessment the Councils consider that a proposed change to the DPD justification wording could be appropriate to reference Climate Focus Area (CFA).

Action:

Modification suggested in Schedule of Modifications.

115

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

Change suggested by respondent:

-

Attachments: None

Support

Summary of representations:

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.

Summary of representation changes to plan:

Amendment to GC Policy 2 (Nature), Part I, Point 1. to include reference to biosecurity standards for sourcing, quarantining, and inspecting plant material supplied to the development.

Response:

Support and change to plan request noted. The policy is considered sound, however, upon further assessment the Councils consider that a proposed change to the DPD could be appropriate. It is recommended that the most appropriate section to include this addition is GC Policy 2 (Nature).

Action:

Modification suggested in Schedule of Modifications.

113

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

Change suggested by respondent:

-

Attachments: None

Object

Summary of representations:

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.

Summary of representation changes to plan:

Amend GC Policy 8, Part D to read:
All buildings must include water efficiency measures and seek to achieve water neutrality. All homes must include water saving measures and, as a minimum, meet the the Government's Environment Improvement Plan (Water Efficiency Roadmap) standard of 100 litres per person per day. Proposals should submit a water efficiency calculator report to demonstrate compliance, and developers are encouraged to demonstrate how they can go further utilising integrated water management and a fittings-based approach to minimise potable water use.

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

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

Response:

Comment Noted. The policy is considered sound, however, upon further assessment the Councils consider that a proposed change to the DPD could be appropriate.

Action:

Statement of Common Ground prepared between Affinity Water and the Councils.

99

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

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

Attachments: None

Object

Summary of representations:

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).

Summary of representation changes to plan:

Amend GC Policy 8, Part D to read:
All buildings must include water efficiency measures and seek to achieve water neutrality. All homes must include water saving measures and, as a minimum, meet the Government's Environment Improvement Plan (Water Efficiency Roadmap) standard of 100 litres per person per day. Proposals should submit a water efficiency calculator report to demonstrate compliance, and developers are encouraged to demonstrate how they can go further utilising integrated water management and a fittings-based approach to minimise potable water use.

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

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

Response:

Comment Noted. The policy is considered sound, however, upon further assessment the Councils consider that a proposed change to the DPD could be appropriate.

Action:

Statement of Common Ground prepared between Anglian Water and the Councils. Modification to policy text suggested.

123

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

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.

Attachments: None

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

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

The removal of reference to a District Heating Network is not considered appropriate. The wording of Policy GC8 only refers to the Councils encouraging the provision of a potential district heating network, should it be viable. The Councils do not consider a change to the policy text is necessary.

Action:

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

234

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

Agent: Lichfields

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.

Attachments:

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

Object

Summary of representations:

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

Summary of representation changes to plan:

None

Response:

Comments noted. The Plan is considered to be sound, is in accordance with the NPPF and based on a robust evidence base, including consideration of air quality in the Sustainability Appraisal. Further assessment will be carried out at planning application stage in the form of Air Quality Impact Assessment.

Action:

None

32

Respondent: Mrs Pam Cowell [56]

Change suggested by respondent:

-

Attachments: None

Object

Summary of representations:

'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!

Summary of representation changes to plan:

None.

Response:

The Garden Community was designated in the joint Section 1 Local Plan. Policy 8 sets out the requirement for all buildings to be Net Zero Carbon in operation and achieve net zero operational energy balance onsite. Existing and new Green Infrastructure is a key element of the DPD with Biodiversity Net Gain targets expected to exceed the legal requirement and achieve 15%.

Action:

None.

75

Respondent: Mrs Sasha Phillips [91]

Change suggested by respondent:

Significantly reducing the amount of housing!

Attachments: None

Object

Summary of representations:

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

Summary of representation changes to plan:

None.

Response:

The Garden Community aspiration is to be an exemplar development that addresses the climate emergency. Proposals must comply with approved Design Codes that set standards in terms of climate change mitigation and adaptation and sustainable design. GC Policy 8 (Part A) states that 'all buildings must be net zero carbon in operation and achieve net zero operational energy balance onsite. The Councils will encourage carbon and energy positive buildings'.

Action:

None.

93

Respondent: Mr David Mead [27]

Change suggested by respondent:

-

Attachments: None

Object

Summary of representations:

- 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.

Summary of representation changes to plan:

None.

Response:

Policy GC 8 sets stringent energy standards for non-residential buildings. According to Part A, all buildings are required to be net zero carbon in operation and achieve an onsite net zero operational energy balance. As part of this mandate, Part B stipulates that the Councils anticipate all non-domestic buildings to attain either 'Excellent' or 'Outstanding' BREEAM ratings. While the Passivhaus standard for residential buildings is an effective measure of energy efficiency, it's important to note that there are alternative measures. The crucial factor is the construction of buildings that uphold high energy efficiency standards in both design and operation, thereby fulfilling the requirements of Part A.

The phrase 'where feasible' in Part C does not dilute the overall requirements. Instead, it offers a certain degree of implementation flexibility. In relation water efficiency, a Statement of Common Ground is currently being drafted between Affinity Water and the Councils, which will endorse more robust measures. This policy forms an integral part of the comprehensive strategy to address the climate change crisis. The projected breach of the 1.5C target in 2027 underscores the urgency and relevance of these measures.

Action:

None.

186

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

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'.

Attachments:

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

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

In response to the concerns raised, it's important to clarify that the financial implications of the sustainable infrastructure requirements have been thoroughly evaluated. The upgrades to the waste water treatment, which were carried out in February 2023, are incorporated in the Phasing and Infrastructure Delivery Plan (February 2023). On page ii of this plan, a budget of £6.8 million is allocated for these upgrades to ensure a seamless connection.
Furthermore, the Net Zero Carbon Viability and Toolkit Study, a report commissioned by the Essex Climate Action Commission, provides valuable insights. As per paragraph 26 of this report, the majority of residential developments have ample viability margins to accommodate the costs associated with achieving net zero carbon. Transitioning from the potential Future Homes Standard 2025, as proposed in the government consultation documents, to net zero carbon incurs an average additional cost of approximately £2,500 per house and £3,000 per flat. Therefore, a 10% allowance should adequately cover these costs.

Action:

None.

202

Respondent: Mr William Sunnucks [113]

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.

Attachments: None

Object

Summary of representations:

- 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.

Summary of representation changes to plan:

None.

Response:

In response to the concerns raised, it's important to clarify that the financial implications of the sustainable infrastructure requirements have been thoroughly evaluated. The upgrades to the waste water treatment, which were carried out in February 2023, are incorporated in the Phasing and Infrastructure Delivery Plan (IDP) (February 2023). On page ii of the IPD, a budget of £6.8 million is allocated for these upgrades to ensure a seamless connection. Alongside the upgrades the policy stipulates the provision of clear evidence on the approach to water conservation. The Councils are working with both Anglian Water and Affinity Water to prepare Statements of Common Ground.

Action:

None.

80

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:

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!

Summary of representation changes to plan:

None.

Response:

The principle of development was established in the Section 1 Local Plan. The Garden Community will actively tackle the climate emergency by promoting low carbon lifestyles. All buildings will be net zero carbon in operation, sustainable transport options and active travel will significantly reduce the amount of greenhouse gas emissions.

Action:

none.

158

Respondent: Mrs Susan Burns [69]

Change suggested by respondent:

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

Attachments: None

Object

Summary of representations:

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.

Summary of representation changes to plan:

None.

Response:

Policy 8 prioritises energy efficiency in buildings. Part A addresses the need to reduce regulated and unregulated energy use, as well as ensuring that all buildings have onsite renewable energy generation that matches total energy consumption. This is approach to increased environmental build standards is further advocated through the insulation fabric, building orientation, solar gain and other build factors promoted to maximise efficiency (Part B), with Passivhaus or similar certification being encouraged. With regards to future policy changes, the DPD will be subject to a review every 5 years, updates in national or local policy will be incorporated then.

Action:

None.

246

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

Change suggested by respondent:

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Attachments:

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