

2 August 2021

Report of	Assistant Director of Place and Client Services	Author	Alistair Day
Title	Development Brief for the ABRO Site		282479
Wards affected	New Town and Christchurch		

1. Executive Summary

- 1.1 The DSG site (formerly known as ABRO) forms part of the Defence Estate and was previously leased to Babcock International under a contract with the Ministry of Defence relating to its army vehicle servicing. The decision has been made to dispose of this site for development as it is no longer required for military purposes. The site is located in an historically sensitive location, and, for this reason, a development brief has been prepared to provide planning guidance on the issues and opportunities associated with the site and to provide a clear and robust development framework to aid the future smooth delivery of a suitable development scheme. Members are requested to endorse the recommendation that the development brief is adopted as a planning guidance document.

2. Recommended Decision

- 2.1 To adopt the ABRO Development Brief as a planning guidance document.

3. Reason for Recommended Decision

- 3.1 The adoption of the ABRO Development Brief as a planning guidance document will set out key parameters of how this site should be developed; once adopted, the brief will form a material planning consideration when determining planning applications.

4. Alternative Options

- 4.1 Members can decide not to adopt to the ABRO Development Brief. If this option is chosen, it would weaken the weight afforded to the development brief when considering future planning applications and thereby potentially reduce the ability of the Council to shape the redevelopment of this important site.
- 4.2 Alternatively, Members could decide that the ABRO Development Brief should be adopted as a Supplementary Planning Document (SPD). The adoption of the ABRO Development Brief Plan as an SPD would increase the weight afforded to the brief; however, further work would be required before the Development Brief can be adopted as SPD.

5. Background Information

- 5.1 The ABRO site was used as a military vehicle repair facility. The site was vacated in about 2019 and has not been used since that time. It is understood that Defence Estates intend to dispose of the site in the very near future for redevelopment.
- 5.2 The site is within an historically sensitive location. Along the southern edge of the site lies the Roman Circus Scheduled Ancient Monument (SAM). Discovered in 2005, it is the only known Roman Circus in Britain. The Benedictine Abbey of St John, which is also scheduled, is located to the east of the site. The site is thus located within an area of archaeological importance and there is high potential for encountering (unknown) below-ground archaeological remains of significance. The site was previously part of the Royal Artillery Barracks (later known as Le Cateau Barracks) which was initially constructed in 1874 - 75. The barracks complex featured stable blocks, living quarters, gun sheds, offices, a water tower, coal yard and guard house, along with schools, stores and recreational areas. The barracks were enclosed by a high brick boundary wall, part of which runs along the northern boundary of the ABRO site. Artillery Barracks Folley runs along the outer edge of the wall and appears to date back to this time. The Officers' Quarters - which adjoins the site to the southeast is listed Grade II listed and has recently been converted into housing. Within the site, most of the original barracks' buildings have been demolished. There are however two buildings of potential historic or architectural value; these are the Infirmary Stables and the Carpenters and Telecommunications Shop, both of which are built onto the boundary wall along the northern edge of the site. The Garrison Conservation Area has recently been extended to include the ABRO site. The Town Centre Conservation Area (Colchester Conservation No.1) adjoins the north eastern corner of the site.
- 5.3 The site is some 300m to the south of Colchester town centre and is situated in an accessible location. The redevelopment of this site has the potential to provide high quality housing that is befitting the rich architectural heritage of Colchester. The site occupies approximately 4.3 hectares of land, 3.8 hectares of which has been allocated for residential use within the Emerging Local Plan. The Roman Circus Scheduled Ancient Monument extends over the southern part of the site and forms the remaining 0.5 hectares of land, which is allocated as open space in the Emerging Local Plan. The purpose of preparing a development brief for this site is to provide guidance on issues and opportunities and to set out the Council's aspirations for the redevelopment of this important site. The document provides a clear and robust development framework, which is intended to help for the smooth delivery of a suitable scheme.
- 5.4 An informal 'light touch' consultation exercise was initially undertaken with Members, the landowner, Colchester Archaeological Trust, the Civic Society, Historic England, the Highway Authority and Essex Police in March / April 2020. The comments made by these organisations and interest groups were taken into account in drafting the development brief that was subject to a formal public consultation exercise between 8 February 2021 to 8 March 2021. The public consultation was undertaken in two ways:
- via the Council's Planning Consultation webpage; and
 - the owners or occupiers of the properties within and adjacent to the limits of the DSG Site were notified by letter.

Whilst the formal consultation exercise ran between 8 February 2021 to 8 March 2021 all representations that were received prior to writing this report have been considered.

- 5.5 The public consultation on the Development Brief for the ABRO site was coordinated with the consultation on the updated Roman Circus Management Plan and on the proposal extend the Garrison Conservation Area (to include the ABRO site within the conservation area). In total 34 responses were received; a summary of the representations received together with the officer response is set out in Appendix 1. In addition to the amendments made in relation to comments received on the draft brief, officers have also amended the text of the brief to: reflect the updated local plan position; to align the guidance more closely with the National Design Guide and has noted that there are existing views of Jumbo from Circular Road East and that the any future development proposal should seek to retain these.

6. Equality, Diversity and Human Rights implications

- 6.1 None directly arising from this report.

7. Strategic Plan References

- 7.1 The Development Brief for the ABRO site accords with the objectives of the Strategic Plan to:
- Strengthen Colchester's tourism sector and welcome more visitors each year; and
 - Protect, enhance and celebrate Colchester's unique heritage.

8. Consultation

- 8.1 The Development Brief for the ABRO site has been the subject of a public consultation exercise. No objections were received to the brief and where appropriate comments have been incorporated into the brief.

9. Publicity Considerations

- 9.1 The Development Brief for the ABRO site has been subject to publicity as a part of the public consultation exercise; any further publicity associated with the adoption the development brief should be seen in a positive light.

10. Financial implications

- 10.1 Appeals against a planning refusal can expose the Council to significant expense and costs where the Local Planning Authority is seen to have acted unreasonably. The provision of the Development Brief will increase developer certainty and will become a material consideration in the determination of planning application, thereby reducing risk of an appeal.

11. Health, Wellbeing and Community Safety Implications

- 11.1 None identified.

12. Health and Safety Implications

- 12.1 None directly arising from this report.

13. Risk Management Implications

- 13.1 The provision of a Development Brief for the DSG site will serve to inform planning decisions and is based on policies within the Local Plan which will help to reduce the risk of inappropriate development being permitted.

14. Environmental and Sustainability Implications

- 14.1 In order to support the achievement of sustainable development, the Development Brief recommends that new development is undertaken in the most sustainable way possible, delivering the Council's social and economic aspirations without compromising the environmental limits of the area for current and future generations. The brief recommends that new buildings seek to fully integrate sustainable design and construction with urban design to ensure the delivery of a high-quality new development and to maximise the opportunities to enhance the environmental performance of new development. The Brief relates to the reuse of previously developed land in a highly sustainable location.

Appendices

Appendix 1: Summary of comments received and Officer response.

Appendix 2: ABRO Development Brief

Background Papers

The Emerging Local Plan

Appendix 1: Summary of comments received and Officer response.

Comment	Response	Action / suggested way ahead
Cllr Barton		
Artillery Folley should be restored as a part of the proposals	The brief proposes the enhancement of the folley	None
Cllr Whitehead		
The Napier Road / Flagstaff Road junction is an important walking and cycling route and there are existing traffic safety issues along nearby Circular Road North (lack of an adequate crossing points). The surrounding roads are likely to get busier, making traffic control and maintaining an inviting environment for cyclists and pedestrians even more of a priority.	<p>The Brief promotes safe and convenient movement of pedestrians and cyclists.</p> <p>The need to safeguard pedestrians and cyclists will be a key consideration however at this stage is not possible to prescribe the scope of the highway improvement (mitigation) works as this will need to reflect the type / scale of the proposed development</p>	None
Local Residents		
The Brief is comprehensive, well thought through, easy to read and understand.	Noted	None
There is good coverage of all the issues relevant to making positive progress in this area of Colchester.	Noted	None
There is a lack of clarity around accommodating / enhancing the Roman Circus and its environs. This needs to be clearer, as it is a key piece of history within Colchester's timeline.	At this stage it is not known what form the improvements to the Roman Circus will take and there is it is not possible to be prescriptive on this matter. The brief provides flexibility to enable the possible expansion of Roman Circus House and/or facilities associated with the circus	None
Increased permeability afforded by the redevelopment of the ABRO site is welcomed.	Noted	None
Emphasis on landscaping and providing a 10m buffer zone	Noted	None

around the circus is a good idea		
The regard given to existing trees and their heritage as original garrison enhancements is welcomed.	Noted	None
Affordable housing - allowing people to invest in ownership brings about better outcomes than providing subsidised rented accommodation.	The provision and type of affordable housing is set out in the Local Plan and adopted guidance.	None
The Council will need to invest in street maintenance; the traffic calming furniture adjacent to the zebra crossing took years to be replaced, the weeds growing out of the kerbs are unsightly and in general it looks like Stable Rd has been forgotten.	The maintenance of adopted roads is the responsibility of Essex County and falls outside the scope of this brief	None
It is hard to make any substantial comments without knowing what the future plans are for it more precisely.	Noted ... until a planning application is submitted the detailing of the scheme will not be known. The brief sets out key principles / parameters for any future redevelopment proposals	None
Artillery Folley must be improved as a part of the development, and it is important to enhance natural surveillance of this key route	The improvement of the Folley is set out in the brief	None
Recognition that this is a site of great historical importance is welcomed.	Noted	None
The site is appropriate location for a significant visitor attraction – expansion of the Roman Circus facilities or a military museum.	The brief allows for the expansion of the facilities associated with the circus.	None
The Council should now purchase this site	The decision whether the Council should purchase the site falls outside the scope of the brief	None
The commitment to the enhancement of biodiversity importance of 'connecting' spaces for nature and wildlife is welcomed.	Noted	None
Any community facilities must be delivered in a timely	This falls outside the scope of the brief. Any community	None

manner ... the issues associated with the adjoining Bovis / Linden Homes development must be avoided.	facilities will need to be secured through a legal agreement as a part of any planning permission. The legal will need to include appropriate trigger points for the delivery of the community facilities	
Anglian Water		
There are several foul sewers in the vicinity of Roman Circus Walk (outside of the road) and a water main which runs parallel to Circular Road North (outside of the road). It would be helpful to refer specifically to Anglian Water's water supply and water recycling infrastructure as set above and direct applicants to seek advice of Anglian Water in respect of the need for any diversions or relocation of our existing infrastructure.	Noted	Comment incorporated.
Reference is made to integrating sustainable design and construction but this is not expanded upon further in the Development Brief. As part of which we would recommend consideration be given to increased water efficiency as part of any proposals and how this should be set out as part of the planning application.	The brief sets out general requirements in respect of sustainability issues.	
Anglian Water fully support the requirement for applicants to include the provision of Sustainable Drainage Systems (SuDS). The use of SuDS would help to reduce the risk of surface water and sewer flooding and which can have wider benefits e.g. water quality enhancement. We would recommend that a sustainable drainage and foul drainage should be submitted with any application to set out the proposed strategy for both SuDs and foul drainage and the adoption and maintenance of SuDs features.	Noted	Incorporated into the Brief

<p>Essex Police</p> <p>This is an exciting, proposed development seeking a synergy to provide high quality housing whilst preserving this unique historic environment.</p> <p>Essex Police would welcome the opportunity to provide assistance where we can and become consultees on these planned developments. Our early consultation with prospective developers is always of benefit and we would recommend such consultation with the objective of achieving a sympathetic, sustainable, safe and secure development. We would further recommend within this process that developers seek to achieve Secured by Design accreditation, providing evidence of a safe and secure environment</p>	<p>Noted</p> <p>This is already incorporated into the brief</p>	<p>None</p> <p>None</p>
<p>Colchester Cycle Campaign</p> <p>The list of policies to consider should include LTN 1/20 [2] and the Essex Cycling Strategy [3]</p> <p>We welcome the use of filtered permeability and home zones and we support the continuation of the Flagstaff Rd. filter</p> <p>Several of the diagrams lump pedestrian and cycle routes together, with “& cycles” in parentheses, c.f. Figure 1. Cycles must be treated as vehicles and not as pedestrians so any combined routes must be handled carefully.</p> <p>Cyclists should be happy to cycle in the road of suitably calmed streets</p>	<p>Noted</p> <p>Noted</p> <p>This will need to be considered as a part of the assessment of the detailed design.</p> <p>Noted</p> <p>Noted</p>	<p>Added LTN 1/20 as a good practice guidance document.</p> <p>None</p> <p>None</p> <p>None</p> <p>Amendment to text made.</p>

<p>Car parking is discussed but cycle parking is only mentioned in passing. Secure cycle parking should be provided in line with policy.</p> <p>Notwithstanding the proximity to the Town Centre and travel hubs, significant gaps in cycle infrastructure hinder their accessibility from the site by bike. These gaps should be addressed, which include, but are not limited to: the Abbeygate St. underpass, the East-West cycle route along Southway, and St. Botolph's Circus. – NB Given that an at grade crossing of Southway was specified in the Garrison masterplan, the underpass should be a high priority</p> <p>While the proposed renovation of Artillery Folley is welcomed, it is questionable whether it could ever be wide enough for use as a shared use path. Replacement of the steps at the Western end is clearly a pre-requisite.</p> <p>Any improvements to the junction of Flagstaff Road and Circular Roads North and East should improve facilities for cyclists on what is an important junction in the cycle network. Improving cycle infrastructure will ease problems around vehicular access</p> <p>Further mitigations of the constraints around access could include: – using both Flagstaff Road and Roman Circus Walk but preventing a through route with a modal filter – providing parking for St. John's Green School at nearby car parks, e.g. Napier Road</p>	<p>Any future development will need to mitigate its impact; this may include improvements to nearby cycle infrastructure. Any such improvements must be reasonable and related to the development. Until the type and scale of the development is known it is not possible to state what improvements works can be justified.</p> <p>The Folley is not formally designated as a cycleway and it is unlikely that this route can be improved to an adoptable standard. The brief requires pedestrian and cycle links to be provide through site and for these be integrated with existing routes.</p> <p>The brief requires improvements to pedestrian and cycle facilities. Any works to the adopted highway will require the approval of the Highway Authority.</p> <p>The brief requires that the site fully integrates with the surrounding area. The possible introduction of filtered routes will need to be considered as a part of the detail design.</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>
Transportation Team (CBC)		

<p>We understand that the Folly will be enhanced and will form its original function of a PROW. Therefore, with the removal of cycling in the Folly we would ask that a suitable, direct cycle route linking Butt Road with Abbeygate be provided within the development layout. This could be by way of linking into Roman Circus Walk.</p>	<p>The brief requires that the site fully integrates with the surrounding area.</p>	<p>None</p>
<p>Shared mobility hubs should be added in relation to supporting car free/low car development proposals. These would offer residents access to pay as you go shared transport opportunities to mitigate the reduced/removed car park provision. They could include standard or electric Scooters (if legalised), bikes and cargo bikes as well as car club vehicles.</p>	<p>Noted</p>	<p>Added to the brief.</p>
<p>Defra has confirmed funding for two eCar club cars in the town centre and 2 shared eMobility hubs made up of eBikes and eCargo bikes. The provision of 2 eCar club cars will kick start the network of car club cars that will come forward over the next few years through the various section 106 obligations that have a car club commitment. To further encourage/support the consideration of low/no car parking proposals reference should be made to eCarclubs and shared mobility hubs in Colchester, so if the development went down the car free route there will already be a car club network and established shared mobility hubs in Colchester to link in with?</p>	<p>Noted</p>	<p>None</p>
<p>Any car club proposals would need to be electric.</p>	<p>Noted</p>	<p>None</p>
<p>If no individual secure cycle parking is provided within each dwelling, then a properly secure hub with access for</p>		<p>Text amended for clarity.</p>

<p>residents only must be provided.</p> <p>A contribution towards the secure cycle hub in the town centre as this will be their</p>	<p>This will be determined as a part of the planning application process</p>	<p>None</p>
<p>Historic England - Comments on draft brief</p> <p>The comments are focused on the Heritage, Archaeology section, which seem very well thought out and put together.</p> <p>The strategy for managing archaeology is likewise fine.</p> <p>The only real comment is that the legal protection for the scheduled monument is not mentioned until Chapter 3.8. I would suggest that as this is legislation, it should rank above policy and be mentioned at the beginning of Chapter 2, as a Statutory Obligation.</p> <p>The statement at 3.8 is also erroneous as there is only one legislation (the 1979 Ancient Monument and Archaeological Areas Act) that protects the scheduled monument.</p> <p>In conclusion, overall we welcome the draft Brief as we acknowledge that it will provide a clear, coherent and robust framework for all potential stakeholders. We consider it demonstrates an appropriate level of awareness in relation to the sensitivity of the historic environment in the immediate vicinity and the wider area.</p>	<p>Noted</p> <p>Noted</p> <p>Noted.</p> <p>Noted</p>	<p>None</p> <p>Additional text added to state that it is statutory requirement to determine application in accordance with the development. Subsequent text left in the same order</p> <p>Text amended.</p>
<p>Sir Bob Russell</p> <p>The crucial phrase in the Brief is: "Fine-grain low-rise local townscape." In other words,</p>	<p>The text in question is describing the context in which with two post-war office</p>	<p>None</p>

no new buildings which are out of scale with nearby residential streets. There must be total resistance to new housing of 3-storeys or even 4-storeys.	blocks (Crown Office Buildings at 6 storeys and Wellington House at 8 storeys) sit.	
It is important that the height of buildings throughout the development are not higher than the 19th century dwellings in nearby streets – South Street.	In respect of building heights, any new development will need to respect the historic setting and local character, (the brief notes that buildings should generally be limited to 1-4 storeys, unless townscape and visual impact analysis demonstrates that taller buildings will not cause harm to the character of the area and are of an exceptional design).	None
Examples of good new housing are shown in the Brief – please, we must not have a repeat of the ugly new 3-storey buildings along Circular Road.		
The Draft is a document which I can support in principle (other than 3 or 4-storey dwellings) – but with the caveat that sufficient land needs to be allocated next to Roman Circus House for a coach park and bigger car park for tourists.	The Brief allows for the possible expansion of Roman Circus House however without having firm proposals it is not considered appropriate to identify a specific area of land.	None
There needs to be corporate joined up thinking across the whole Council. The site, and its potential, is too important for it to be regarded as purely a Planning matter. I would argue that the starting point should be: how can we (as in the people of Colchester) best use this surplus Ministry of Defence land to best advantage – best advantage in respect of its proximity to, and overlapping of, the only Roman Circus known to have existed in Roman Britain.	The Local Plan Committee has requested that the Council consider the possibility of purchasing the site. This is a separate piece of work to the development brief.	None
The Planning Brief needs to expand its boundaries beyond the ABRO site so that wider considerations relating to the Roman Circus can be fully incorporated.	The purpose of the brief is to set parameters as to how the ABRO site may be redeveloped. The Roman Circus Management Plan is the appropriate vehicle for developing the circus as destination feature.	None
Part of the Section 106 planning gain should include	It is not appropriate for the brief to prescriptively set out	None

<p>finance to construct a section of what the Circus seating would have looked like.</p> <p>A further planning gain should be the restoration of the historic 19th century tiled paving in Artillery Barracks Folley.</p> <p>I am strongly of the opinion that all vehicular movements must be from a single access road – from Flagstaff Road, at the location of the long-established entrance to the ABRO site. Pedestrian and cycle routes into Butt Road and from Abbey Field should be provided, as well as at the corner of Walsingham Road and Artillery Barracks Folley. I cannot see any advantages in creating gaps in the Wall to provide pedestrian access to the Folley</p> <p>With up to 300 dwellings there will clearly be traffic movement into and out of the site from Flagstaff Road, so in the interests of road safety I suggest that a 20mph speed limit is introduced from the crossroads junction with Napier Road and Circular Road and that within the ABRO site itself there be a 10mph speed limit</p> <p>It is further suggested that the Flagstaff Road/Napier Road/Circular Road crossroads be moved a few metres westwards so that space is created on the eastern side at Napier Road to enable a second pedestrian crossing to be installed to assist pupils & parents walking to and from the two sites of St John's Green School.</p> <p>A pedestrian crossing should also be installed near the junction of Walsingham Road and Flagstaff Road so that pedestrians can cross</p>	<p>s106 contributions. Any contributions will need to meet the statutory tests.</p> <p>The brief requires the restoration of the Folley</p> <p>The brief reflects these comments.</p> <p>The Highway Authority will need to determine the appropriate speed limit for the development site and surrounding road network.</p> <p>The land falls outside of the control of the applicant and would involve constructing a road over the Roman Circus (in conflict with the requirements of the adopted Management Plan)</p> <p>The Highway Authority is the responsible authority for determining what highway improvements will be required</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p> <p>None</p>
---	--	---

<p>Flagstaff Road in greater safety at that point than continuing to the junction into the ABRO site which would be less safe.</p> <p>I disagree with the proposal that the diagonal Public Footpath between Walsingham Road and Flagstaff Road (currently marking the physical boundary of the ABRO workshops site) should be closed. I think that the boundary of the 19th century barracks followed an historic field path. It has been a Public Footpath for more than 160 years. The line of this Public Footpath can be retained within the layout of the new housing.</p> <p>I believe that all trees within the site of the Roman Circus should be removed in order that the layout of the Circus can be more effectively displayed. Replacement trees should be planted within the development and nearby wider area to compensate for the loss of trees within the Circus.</p> <p>With it being impossible to re-route public roads which cut across the layout of the Circus, I recommend that where roads cross the Circus then they be clearly shown with "Roman purple" tarmac. It is important that the historic 19th century and early 20th century buildings are retained.</p>	<p>to mitigate the impact of this development.</p> <p>In the interest of creating an appropriate form of development it is considered prudent to allow for a flexible response in respect to the retention / diversion of the footway</p> <p>The trees form an integral part of the nineteenth century garrison development and have a positive effect on the character and appearance of the conservation area. The Roman Circus Management Plan allows for their retention.</p> <p>This proposal is not directly related to the development and should be considered as a part of the Roman Circus Management Plan. Any alteration to the surface of an adopted road would require the consent of the Highway Authority.</p>	<p>None</p> <p>None</p> <p>None</p>
<p>The Colchester Civic Society</p> <p>Our overall response is one of agreement and pleasure in it coinciding with so many of our own hopes and aspirations for the site. This particularly</p>	<p>Noted</p>	

<p>applies to the determination to improve the quality of design in the new housing provision.</p> <p>We very much hope to see the unfortunate elements of the nearby Bovis development recognised and not repeated.</p> <p>The need for retention of existing green areas abutting Abbey Fields and the creation of new in the housing provision is essential.</p> <p>We are equally pleased with the recognition of the need for restoration of the Artillery Barracks Folley to be an integral part of the brief. We would add that the addition of a cycle wheel ramp at the Butt Road steps would be a useful improvement to its functionality.</p> <p>The need for new access through the Barracks wall would be acceptable and there is a view that replacement of the rear fencing to the South Street houses that form the opposite side would be a considerable blessing too.</p> <p>We do endorse the “fine grain low rise local townscape” concept and the desire for an emulation of the barrack or terrace as a model.</p> <p>We would however be far from agreeable to any new housing seen to be of a four-storey height and would regard three as an absolute maximum to retain that link with the surrounding 19th century housing stock of the Butt Road area as well as that of the earlier built South Street/Chapel Street neighbourhood that the site adjoins.</p> <p>The aim for a 30% affordable housing mix is hoped to be</p>	<p>Noted</p> <p>Noted</p> <p>The Folley is not formally designated as a cycleway and it is unlikely that this route can be improved to an adoptable standard. The brief requires a pedestrian and cycle to be provided through site and to be integrated with existing routes</p> <p>This is addressed in the brief.</p> <p>The text “fine grain low rise local townscape” relates to the character of elements of the surrounding built form; it does not mean that the new development will be of a similar height.</p> <p>The brief requires the new development to respond to the historic setting and local character; the brief notes that building heights should not exceed 4 storeys, unless townscape and visual impact analysis demonstrates they would not cause harm to the character of the area and are of an exceptional design.</p> <p>30% affordable housing reflects the requirement of the emerging local plan.</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p> <p>None</p>
--	---	---

<p>achievable and we would very much encourage the concept of modern day alms housing to be considered for this site given the close proximity to the town centre and the need for young people and post army housing provision .</p> <p>There are concerns regarding the access and egress from the site through Flagstaff Road and into the Napier Road/Circular Road junction at such a sensitive position.</p> <p>The challenge of re designing usage of the St Botolph's roundabout and the possible consideration of one-way routing in lower Mersea Road.</p> <p>We heartily welcome the recognition of the importance to the town's heritage future of the Roman Circus site and the need to provide for it's safeguarding as well as it's greater development as an attraction through increased historical interpretation and higher quality display. The Society is convinced that if the Roman Circus is to attract the visitors it deserves coach parking will be a necessity as well as better signage and clear pedestrian routes.</p> <p>The need for the archaeological surveying of the whole ABRO site to determine the Circus's relationship with its greater milieu .</p>	<p>The Highway Authority will be consulted on any planning application for the redevelopment of this site and will consider the highway safety of this junction.</p> <p>This fall outside the scope of this brief. Essex County Council are currently exploring proposals for the improvement of St Botolph's roundabout</p> <p>Noted. The Roman Circus Management Plan provides the appropriate vehicle for developing proposals for the enhancement of this feaure ... the development brief provides flexibility for the development of facilities at the Circus</p> <p>This is reflected in the brief.</p>	<p>None</p>
<p>Landowner</p> <p>The DIO is strongly supportive of the proposals to deliver residential development on the Site. We consider that the Site comprises an excellent opportunity to deliver a high-quality housing scheme</p>	<p>Noted</p>	<p>None</p>

<p>We are strongly supportive of the DB as a means of providing an additional level of detail to sit alongside the emerging residential allocation in the local plan as this will further bolstering the principle of it being redeveloped for high-quality housing</p>	<p>Noted</p>	<p>None</p>
<p>The brief identifies a potential need to accommodate the expansion of the Roman Circus Visitor Centre in addition to delivering new homes there. It is unclear the form that such 'expansion' would take. Whilst the DIO is open to discussing this further with the Council, the aspiration for the Visitor Centre to be expanded on part of the Site could only be supported in the event that these works are demonstrated to be feasible, viable and not detrimental to the overall principle of optimising high-quality housing delivery at the Site. We strongly recommend that wording within the DB be updated to reflect this.</p>	<p>At this stage it is not known what form the potential expansion will take and is it not possible therefore to confirm the form that these proposals may take. It is not considered that the expansion of circus facilities would be detrimental to the principle of delivering high quality housing on this site in line with the requirements of the emerging local plan. The text has been amended in the brief to note that proposed housing and expansion of the circus facilities need to be mutually compatible.</p>	<p>Text amended.</p>
<p>The DB identifies that the Site should deliver an element of open space, citing a "requirement for a minimum of 10% (gross) of the residential development area to be open space". Through a high level Concept Masterplan it has been demonstrated that 10% open space can be comfortably accommodated within the Site. The DIO is therefore supportive of this wording noting the role of open space in high quality placemaking, and the location and heritage value of the Roman Circus SAM.</p>	<p>Noted</p>	<p>None</p>
<p>Given the site's central and accessible location, it provides a strong opportunity to deliver a reasonably urban scale/residential density. Our</p>	<p>Noted</p>	<p>None</p>

<p>indicative Concept Masterplan demonstrates how an overall proposed average density of 70 dwelling per hectare could be achieved at the Site (albeit this is on the basis that some individual plots on-site exceed this density range). The Concept Masterplan would result in a total of 294 residential units being delivered on-site, which aligns with the upper site capacity range outlined within the Draft DB</p> <p>The current DB seeks to establish the acceptability of a 'net' residential density of between 45-80 dwellings per hectare at the Site. However, our Concept Masterplan demonstrates that there are some parts of the Site where this residential density range could be exceeded (resulting in built form of up to four storeys) whilst still maintaining an overall average residential density below 80 dwellings per hectare. Given the above, we strongly consider that the DB should be updated to identify that an overall residential density of 'up to an average of 80 dwellings per hectare' could be acceptable on-site, where this is supported by robust design and townscape analysis.</p> <p>The DIO is supportive of the proposed requirement for new development to contribute to, and complement, local character. We also support the aspiration to respect the history of the area and the existing townscape as a key masterplanning principle, whilst ensuring that new development at the Site effectively and sensitively optimises new housing delivery</p> <p>The DIO has prepared a Concept Masterplan for the</p>	<p>The Development Brief sets out a density range for housing across site and this is considered to provide an appropriate degree of flexibility for the successful redevelopment of this site</p> <p>Noted</p> <p>Noted. The brief requires future development to</p>	<p>Text amended but still requires any new development to</p>
---	--	---

<p>Site, demonstrating a designed approach centred on responding to the key site-specific and local characteristics. The layout of the Concept Masterplan is driven by the creation of a green axis, intended to draw the parkland landscape associated with the Roman Circus through into the new development. The layout also seeks to utilise some retained non-designated heritage buildings as placemaking features. It is considered that the wording of Paragraph 4.10 of the DB be amended to be less prescriptive on the typology of buildings that should come forward and instead state that 'the design and layout of new development should be informed by design and townscape analysis, site topography and site constraints (including archaeology), and through an overarching masterplanning approach.</p>	<p>respond to the characteristic of the site (including its history) and its surroundings. Such developments are generally more regimented; an organic layout is not considered appropriate in this location.</p>	<p>respond to the characteristics of the site</p>
<p>The DB seeks to ensure several non-designated heritage assets on-site are retained through new development. We request that that the DB be updated to allow greater flexibility and the potential removal/demolition of non-designated heritage-assets on-site (where justified by robust heritage evidence at planning application stage). This approach would more closely align with national strategic planning policy objectives within the NPPF. We consider that the DB wording should not preclude the loss of non-designated heritage assets in the future and that Paragraph 4.15 of the DB should be re-worded as follows: "The Infirmary Stables and Carpenters Telecommunications Shop are considered to be non-designated heritage assets . Any impacts on or proposed</p>	<p>Noted The text in the brief has been amended from must retain the locally listed buildings to be should retain the buildings.</p>	<p>Text Amended</p>

<p>loss of these non-designated heritage assets should be carefully considered in the planning balance (at application stage), subject to reasoned justification’.”</p> <p>The DB also references the potential for improvements to the folley (including paving) to be delivered in the future. It is considered that the need for such improvements should be determined at planning application stage, and in consultation with CBC (rather than prescribed within the DB). As such, we consider that the requirement to contribute to the folley within Paragraph 4.16 of the DB should include a note that this is to be the case ‘only if demonstrated to be viable and deliverable in due course at application stage’.</p>	<p>Improving / enhancing pedestrian connectivity is a fundamental objective of brief</p> <p>The upgrading of the folley will encourage its greater use by pedestrians including those from the development</p>	<p>None</p>
<p>We note that CBC are currently consulting on proposals to extend the Garrison Conservation Area boundary (so that this now includes the Site). If extended, this conservation area would become an ‘onsite heritage asset’. As the DIO has already taken part in an earlier informal consultation process concerning the Draft DB, its team was already aware of the Council’s intentions to extend the conservation area boundary. Therefore, the current Concept Masterplan has been prepared to be mindful of this context, and we consider that it is fully compatible with (and respectful/sensitive to) the Garrison Conservation Area even in the event that its boundary is extended</p>	<p>Noted</p>	<p>None</p>
<p>We note that archaeology is a key consideration concerning redevelopment of the Site (and relevant archaeological investigations will be key to fully unlocking the Site’s redevelopment potential).</p>	<p>Noted</p>	<p>None</p>

<p>An assessment has been undertaken by Capita to identify the amount of traffic potentially to be generated by the DIO's masterplan proposals. We do not consider there to be any insurmountable transport consideration at this stage</p>	Noted	None
<p>It is not considered that there are any insurmountable ecological constraints at the Site which would prevent its redevelopment</p>	Noted	None
<p>The DB suggests that some trees on site may be subject to Tree Protection Orders. The submitted Concept Masterplan is sensitive to this, with trees proposed to be retained where possible</p>	Noted	None
<p>The DIO's masterplan includes the potential to incorporate or divert the Public Right of Way to ensure that the masterplanning approach is flexible. It is also noted that Artillery Barracks Folley is a Public Right of Way; the proposed masterplan increases permeability to this link which is considered to be a benefit.</p>	Noted	None
<p>We highlight that there is a disparity between Figures 8 and 9 within the DB. 3.54 Figure 8 (Key Principles Plan) shows the south western part of the Site to be within a 'greened character area'. However, this approach is incongruent with the spirit of the wider DB's vision, which seeks to optimise residential use on the Site whilst ensuring 10% open space is provided (focussed around the Roman Circus). 3.55 Figure 9 (illustrative Plan) is more accurately representative of the DB's wider vision. This shows the majority of the Site falling within an 'Urban Character</p>		

<p>Area', with 'Green Space' focussed around the Roman Circus. 3.56 Given the above, we strongly recommend that Figure 8 within the DB be updated to more closely align with Figure 9 (and with the DB's wider vision for the Site)</p> <p>Overall, the DIO and its team broadly support the vision and development principles outlined within the Draft DB, subject to the refinements recommended within above sections of this representation</p>		