

# Local Plan Committee Meeting

**Moot Hall, Town Hall, High Street,  
Colchester, CO1 1PJ  
Monday, 22 July 2019 at 18:00**

**The Local Plan Committee** deals with the Council's responsibilities relating to the Local Plan

## Information for Members of the Public

### Access to information and meetings

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<https://colchester.cmis.uk.com/colchester/MeetingCalendar.aspx>.

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**COLCHESTER BOROUGH COUNCIL**  
**Local Plan Committee**  
**Monday, 22 July 2019 at 18:00**

**The Local Plan Committee Members are:**

Councillor Nick Barlow  
Councillor Lee Scordis  
Councillor Lewis Barber  
Councillor Tina Bourne  
Councillor Phil Coleman  
Councillor Andrew Ellis  
Councillor Chris Hayter  
Councillor Patricia Moore  
Councillor Beverley Oxford

Chairman  
Deputy Chairman

**The Local Plan Committee Substitute Members are:**

Other than the Local Plan Committee members, all members of the Council who are not members of the Planning Committee.

**AGENDA**  
**THE LIST OF ITEMS TO BE DISCUSSED AT THE MEETING**  
**(Part A - open to the public)**

**Members of the public may wish to note that Agenda items 1 to 5 are normally brief.**

**1 Welcome and Announcements**

The Chairman will welcome members of the public and Councillors and remind everyone to use microphones at all times when they are speaking. The Chairman will also explain action in the event of an emergency, mobile phones switched to silent, audio-recording of the meeting. Councillors who are members of the committee will introduce themselves.

**2 Substitutions**

Councillors will be asked to say if they are attending on behalf of a Committee member who is absent.

**3 Urgent Items**

The Chairman will announce if there is any item not on the published agenda which will be considered because it is urgent and will explain the reason for the urgency.

**4 Declarations of Interest**

Councillors will be asked to say if there are any items on the agenda about which they have a disclosable pecuniary interest which would prevent them from participating in any discussion of the item or participating in any vote upon the item, or any other pecuniary interest or non-pecuniary interest.

**5 Have Your Say!**

The Chairman will invite members of the public to indicate if they wish to speak or present a petition on any item included on the agenda or any other matter relating to the terms of reference of the meeting. Please indicate your wish to speak at this point if your name has not been noted by Council staff.

**6 Minutes of Previous Meeting**

The Committee will be invited to confirm that the minutes of the meetings held on 4, February, 2019, 6 April 2019 and 22 May 2019 are a correct record.

**Local Plan Committee Minutes 4 February 2019** 7 - 22

**Local Plan Committee Minutes of 8 April 2019** 23 - 32

**Local Plan Committee Minutes of 22 May 2019** 33 - 34

**7 Update to Local Plan and Evidence Base** 35 - 274

The Committee will consider a report providing an update on the Local Plan and the Evidence Base.

**8 Exclusion of the Public (not Scrutiny or Executive)**

In accordance with Section 100A(4) of the Local Government Act 1972 to exclude the public, including the press, from the meeting so that any items containing exempt information (for example confidential personal, financial or legal advice), in Part B of this agenda (printed on yellow paper) can be decided. (Exempt information is defined in Section 100I and Schedule 12A of the Local Government Act 1972).

**Part B**  
**(not open to the public including the press)**







# Local Plan Committee

## Monday, 04 February 2019

**Attendees:** Councillor Christopher Arnold, Councillor Lewis Barber, Councillor Phil Coleman, Councillor Nick Cope, Councillor Andrew Ellis, Councillor Adam Fox, Councillor Gerard Oxford, Councillor Martyn Warnes

**Substitutes:** Councillor Dennis Willetts (for Councillor Nigel Chapman)

**Also Present:**

### 156 Have Your Say!

Tom Foster, Chairman of the Campaign Against Urban Sprawl in Essex (CAUSE), addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He referred to the methodology consultation undertaken by LUC, independent consultants carrying out additional Sustainability Appraisal work for the North Essex Authorities, considering the process to identify the most sustainable solutions did not comprise a suitable analytical framework, with evidence of bias and pre-determination. He was also of the view that the plan was not deliverable and, as such the Sustainability Appraisal could not go ahead. The Barrister, Martin Edwards' opinion was that the Council had shown wilful disregard of the Inspector's advice with doubts about the legality of the process which needed to be addressed before the completion of further work. He explained that CAUSE was proposing that Committee members require the commissioning of a legal opinion on the process, the provision of evidence of financial viability, the cessation of funding to NEGC and the reversion to the Inspector's option 1 which would be the most reliable way of getting the Local Plan adopted with minimum delay.

Paul Frost, representing Hands Off Wivenhoe, addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He represented Hands Off Wivenhoe and highlighted the legal opinion of Martin Edwards, the Barrister for CAUSE. He considered the opinion supported what Hands Off Wivenhoe had been saying about Garden Communities. He referred to the appearance of Colchester, Tendring and Braintree Councils disregarding the comments and guidance of the Planning Inspector. He was also of the view that the public consultation was a token exercise without a genuine and substantive purpose and that opinions expressed by others had also been disregarded.

Andrea Luxford Vaughan attended and, with the consent of the Chairman, addressed the Committee. She referred to the scoping methodology and a 30-minute meeting she

and three other organisations had with LUC. She had deduced from the meeting that there would be no consideration of a proportionate growth strategy despite it being recommended by the Inspector. She also referred to the scope being different to the one submitted to the Inspector as well as the fact that there would be two stages to the assessment. She explained that the first assessment would be split into part A, without infrastructure and part B which would include infrastructure. This would be followed by the second stage would be undertaken by the Local Authorities using a framework, encompassing 15 points for consideration. She questioned how this second stage, which would drive which site would be chosen for development, could be independent. She confirmed she had responded to the consultation on behalf of Wivenhoe Town Council. She questioned how meaningful input from the consultations would be driven and responded to. She also referred to NEGC Ltd and that a promised Business Plan had not been published whilst a budget of £450,000 had been allocated by Colchester Borough Council. She queried what financial contribution the three other Local Authorities would be making and sought clarification regarding the work being undertaken to reflect this level of budget. She sought clarification on what sums of money had actually been paid to NEGC Ltd and from whom. She referred to the brief given to NEGC Ltd to deliver three Garden Communities and whether that had now changed. She also referred Locally Led Development Corporations, the Guidance on the New Towns Act 1981 (Local Authority Oversight) Regulations 2018 in relation to the appointments process for Chairmen and Board members and a statement from John Spence in relation to Braintree, Colchester and Tendring's control of land acquisitions. She also sought clarification on plans to use Compulsory Purchase powers. She asked about the Rapid Transport draft report and whether this had been seen by Committee members and the CAUSE legal opinion and the consensus among various campaign groups that the Sustainability Appraisal had been pre-determined and is very biased and what measures are being taken to counteract this view. She also referred to the existence of a Steering Group, set up to oversee NEGC Ltd the Chairman of which was also the Managing Director of NEGC Ltd, which, in her view, represented a conflict of interest. She also questioned the membership of the Group including a representative from the University of Essex but not from the Hospital Trust. She sought assurance on how the Steering Group could be democratically scrutinised.

## **157 Local Plan Update**

Ian Vipond, Executive Director, responded to the representations made by speakers under the have Your Say! Arrangements and provided a verbal update on the current situation in relation to the Local Plan. He referred to the January update on the Local Plan process, the issues the Inspector had asked the Council to look into and evidence gathering which had been circulated to members of the Committee and was publicly available on the Local Plan website hosted by Braintree District Council.

He referred to the sustainability work being undertaken by LUC and the challenge by the Inspector to ensure a robust and independent piece of work was delivered, although in

the context that it was being done on behalf of a Local Authority. He confirmed that LUC had proposed their methodology following the scope contained in the letter from the Inspector. The consultation exercise had enabled questions to be asked about the methodology and it would be for LUC to decide if they wished to change it and it was not for the Council to get involved in that process.

He referred to the Spatial Options which was the next stage of the process, including proportionate growth, and it would be for LUC to narrow down the number of options needed to be considered. He referred to comments about bias and pre-determination and confirmed that LUC, who were professionals in the Sustainability field, were undertaking an independent exercise which was ongoing. He confirmed he had no knowledge of what the outcome of that process would be.

He referred to comments made about legal opinions and confirmed that legal advice was received on an ongoing basis and the opinion obtained by CAUSE had been looked at a but a specific legal opinion would be sought at the stage when it was clear that all representations had been submitted and could be tested at one time. He reassured the Committee that nothing contained in the CAUSE legal opinion were matters which had not been raised before.

He explained that the consultation in relation to the Sustainability Appraisal was a technical piece of work to assess the sustainable impact of development and was over and above what would usually occur because it was considered important for the LUC methodology to be subject to a specific consultation exercise. The next stage of work would be in relation to Spatial Options which would be subject to a separate consultation exercise whilst it was likely there would also be further consultation on the Local Plan generally and which was an example of what the £450,000 funding was intended for. He confirmed that the funding budget for NEGC Ltd was held by Colchester, he was unable to confirm what funding had been received from the other Authorities, but he was aware that funding decisions by each of the Districts and the County had been agreed at relevant District Cabinet meetings.

He confirmed that a Locally Led New Town Development Corporation was one model by which Garden Communities could be proceeded with and legislative Regulations were now in place for that model. He explained the history of Development Corporations and the involvement of District Councils within them and chaired by an Independent person. Whilst Locally Led examples included an oversight body in the form of the relevant Local Authority. He explained that any Council project would generally include the establishment of a Board, involving Councillors and one or more Working Groups involving council officers. He confirmed that the Managing Director of NEGC Ltd had been appointed Chairman of the Garden Communities Steering Group and that this scenario was not uncommon.

He confirmed that a series of draft workings were expected to be brought to the

Committee for consideration in June/July 2019, with potential for a series of informal briefings at this time.

Councillor Ellis was of the view that the consultation exercise undertaken by LUC with stakeholders had been requested by the Inspector and he did not consider 30 minutes was a sufficient allocation of time for this. He explained that he was expecting the detail of the draft methodology and the results of the consultation exercise to be submitted to the Committee for consideration. He also referred to the suggestion made by the Inspector for the commissioning of a specific legal opinion on the wider Sustainability Appraisal and asked why this had not yet been done. He asked about the sites to be taken forward and the involvement of the Local Authorities in this process. He was in agreement with the need to know what funds had been made available to NEGC Ltd. He referred to the need for the process to be transparent and was of the view that consideration should be given to holding briefings in an open format. He commented that the Scrutiny Panel had been informed that £350,000 had been made available for NEGC Ltd with a further £100,000 to support the Local Plan process and further consultation generally. He referred to the detail and timing of the further consultation and asked when this would be submitted to the Committee for consideration. He considered it vital that the support of local communities for the process had been secured before this was concluded.

The Executive Director responded by confirming that the responses to the methodology would be made public and brought back to the Committee for consideration. He confirmed that the process had been made as robust and independent as possible and it would be for LUC to determine whether the methodology needed to be reviewed in the light of the responses received. In terms of the options for the next stage, due to the Local Plan being part way through an examination, LUC had been given information from the Inspector as to which sites needed to be included and alternatives which needed to be assessed and, in this context, there would be input from the Local Authorities in relation to the scale but there would be later opportunities to challenge from a strategy perspective. Ultimately, LUC would be required to stand by their methodology and their conclusions.

Councillor Ellis sought further clarification in relation to the independence of the process and he questioned the reasoning behind LUC's decision not to initially include proportionate growth in the methodology and the scope that LUC had applied to their definition of proportionate growth. He asked whether the responses to the next round of consultation would be referred to the Committee for consideration and for details of information as it was received by officers to be circulated to the Committee members for information. He also sought clarification on the reason why the Inspector's specific request for a legal opinion to be sought before any further work had been undertaken had not been implemented.

The Executive Director confirmed that matters of evidence would be submitted to the

Committee for consideration prior to submission to the Inspector. Nevertheless, whilst acknowledging the need for transparency, he did not consider it appropriate to bring draft documents to the Committee. In this context, he referred to the informal briefings for Committee members which had taken place in the past and which were intended to continue for the elements of the evidence. He also acknowledged the need for a legal opinion to be sought and confirmed that strong advice had been received that a Barrister's written opinion should be undertaken at the point when all the anticipated opinions from others had been received. He agreed to seek further confirmation on that point.

Councillor Barber was also of the view that the Council should seek to address the legal issues raised at the earliest opportunity and asked for internal legal advice on this matter to be shared with the Committee members. He did not support the allocation of any further funding to NEGC Ltd; he was of the view that consultation should be undertaken by the Council in its own right; he questioned the objectivity of NEGC Ltd given its stated brief to deliver three Garden Communities; he advocated the sharing of draft documents with Committee members, in confidence and welcomed the opportunity to see the contents of all Local Plan associated information so that he would be in a position to check on progress. He also sought clarification on the date for a check and challenge workshop.

Councillor T. Young, Portfolio Holder for Business and Culture attended and, with the consent of the Chairman, addressed the Committee. He explained that a wider Group including the actual Board of NEGC Ltd had been set up and confirmed that he was a Board member, along with a representative from the University of Essex and other agencies. The Group members attend Board meetings and receive help and advice from various sources in order to deliver the best solutions possible. He confirmed, as Portfolio Holder, that he was happy for information to be shared with Committee members on a confidential basis. He also confirmed that Richard Bayley, Managing Director of NEGC Ltd, was also a member of the wider Group so that information and advice could be shared jointly.

Councillor Arnold referred to the setting up of the Docklands Development Corporation and the transfer of planning powers from the Local Authorities to enable that to happen. He expressed concern that the establishment of a Development Corporation may mean that the decision making powers of the Local Plan and Planning Committees might be subject to a similar transfer and he explained that he did not wish to see any democratic deficit or any compromises in order to fit in with Braintree and Tendring. He sought assurances in relation to a Development Corporation potentially exercising planning powers.

The Executive Director was of the view that the three Authorities would not be investigating potential models which involved the imposition of a Development Corporation in this form. He confirmed that legislation had been passed in relation to

Locally Led Development Corporations which included putting the oversight in the hands of Local Authorities and provided for the retention of planning powers if wanted. The Development Corporation provided a mechanism to control the implementation of infrastructure, although there were variations such as for the delivery of regeneration. He also confirmed that Development Plan Documents for the potential Garden Communities would continue to be determined by this Committee.

Councillor Cope sought clarification regarding the definition of proportionate growth and whether it was compatible with the contents of the draft Local Plan.

The Executive Director confirmed that the majority of housing development in the Local Plan was through proportional growth and was what the Council had been doing for the last 50 years. He explained that this was by adding housing development to the edges of settlements with the bulk of the growth going to the bigger settlement, such that Colchester town had taken the bulk of the growth by extending its urban area. He further explained that the proposed Local Plan continued with this proportionate approach, in terms of housing numbers, whilst the three Garden Communities would grow through the Local Plan process and it would be in the following version of the Local Plan that they would come to fruition and housing development in the Borough would then be concentrated in the Garden Communities. This process would therefore change the way development was traditionally delivered in the Borough, although it would still be necessary to provide some development by proportional growth.

Councillor Willetts referred to the matter of pre-determination and remained unconvinced regarding the explanation provided in relation to the separation of decision making and implementation, as such he speculated whether the speaker who had raised the issue was satisfied with the responses given.

Tom Foster, the Chairman of CAUSE, was further invited to address the Committee and explained that, in his view, officers had not listened to the opinions expressed by CAUSE and had declined invitations to attend meetings and conferences organised by CAUSE. He considered this to strongly suggest that the Garden Communities issue had been pre-determined.

*RESOLVED* that the current situation in relation to the Local Plan be noted and arrangements be made for clarification on the funds received from the other Local Authorities to be made available to Committee members following this meeting.

## **158 Minutes**

The minutes of the meeting held on 12 November 2018 were confirmed as a correct record.



## 159 Local Development Scheme

The Committee considered a report by the Assistant Director Policy and Corporate giving details of the Local Development Scheme (LDS) which required updating to reflect consultation and timetable variations for the Local Plan and the Strategic Development Plan Documents as well as the addition of a new Supplementary Planning Document on the Recreational Disturbance Avoidance and Mitigation Strategy.

Bethany Jones, Planning Policy Officer, presented the report and, together with Karen Syrett, the Planning and Housing Manager, responded to members questions. The Planning Policy Officer explained that the LDS was an essential tool used to keep the Local Plan up to date and provide details of consultation periods, public examinations and expected dates of adoption and publication for each document. The Committee had previously reviewed the LDS on a number of occasions with the last update being in November 2017 and it now required updating to reflect further consultation and timetable variations for the Local Plan and the Strategic Development DPDs as well as the addition of a new Supplementary Planning Document on the Recreational Disturbance Avoidance and Mitigation Strategy.

The LDS also set out which documents would form part of the Colchester Local Plan along with the timetable for the preparation and review of each document. The key dates for planning documents, which were further explained within the LDS document itself, attached to the report as an Appendix, were:

- Local Plan
  - Submission – October 2017
  - Examination of Section 1 - January and May 2018, Autumn 2019
  - Examination Section 2 – Spring/Summer 2020
  - Adoption of Section 1 – Spring 2020 (if adopted independently)
  - Adoption of Full Plan – Winter 2020/21
- Planning Obligations SPD, 2019
- Recreational Area Disturbance and Mitigation (RAMs) SPD 2019
- Joint Development Plan Documents for Garden Communities;
  - Issues and Options consultation – Nov 2017- Jan 2018
  - Preferred Options consultation - Winter 2020/21
  - Submission version consultation –Winter 2021/22
  - Submission – Spring 2022
  - Examination – Summer 2022
  - Adoption – Winter 2022/23
- Neighbourhood Planning;
  - Boxted – NP Adopted December 2016
  - Myland – NP Adopted December 2016
  - Wivenhoe – Adoption expected in summer 2019
  - West Bergholt – Adoption expected in autumn 2019
  - Eight Ash Green – Adoption expected in autumn 2019

Great Tey – Adoption in Summer 2020

Tiptree – Adoption in winter 2019/20

Marks Tey – Adoption in Summer 2020

West Mersea – Adoption in spring/summer 2020

Copford – Adoption in spring/summer 2020

- Evidence base documents and updates which will be necessary to support the Local Plan Review
- Changes to the text of the LDS to reflect the range of documents outlined above.

Changes to Regulations meant that there was no longer a requirement to include Supplementary Planning Documents in an LDS, but they had been included to demonstrate the links between all the documents which contributed to the Colchester Local Plan.

Councillor Ellis sought clarification on the timing of a consultation exercise on Section 1 of the Local Plan modifications, whether this would be affected by changes required as a result of a consultation and whether the consultation responses would be submitted to the Committee for consideration prior to further submission the Inspector.

The Planning and Housing Manager confirmed that the LDS would be updated to include a consultation exercise on modifications following the examination of Section 1 of the Local Plan.

Councillor Willetts sought clarification on the timescales for the Neighbourhood Plans and the likely implications due to the potential for some Neighbourhood Plans to be approved prior to the approval of Section 2 of the Local Plan.

The Planning and Housing Manager confirmed that there was no problem with Neighbourhood Plans being approved in advance of the Local Plan and those approved Neighbourhood Plans which contained policies would take precedence. This being particularly important in relation to those Neighbourhood Plans which include allocations as it was then only necessary to provide evidence of a three-year housing supply. She acknowledged the potential to include Neighbourhood Plan timescales in the LDS and was willing to do so if this was considered beneficial, on the understanding that this may lead to more frequent reviews to update the document to take account of matters outside of the Council's control.

Councillor Barber asked about the implications of a Neighbourhood Plan which included housing allocations which were contrary to that contained in the draft Local Plan and whether it was possible to amend the Plan to take account of policies contained in emerging Neighbourhood Plans.

The Planning and Housing Manager confirmed that this was not possible, because the Local Plan was part the way through the examination and the variety of stages of each

of the numerous Neighbourhood Plans.

The Planning Policy Officer proposed the amendment of the LDS document by means of the addition of the words 'hearing session' after Examination in order to clarify this point.

*RESOLVED* that the changes to the Local Development Scheme (LDS) be agreed.

## **160 Mill Field Conservation Area Designation**

The Committee considered a report by the Assistant Director Policy and Corporate seeking authority to proceed to the statutory designation of the proposed new Conservation Area to be known as Mill Field Estate Conservation Area, together with the inclusion of an Article 4 Direction. The Mill field Conservation Area Appraisal and Management Plan document was attached to the report and an amendment sheet had been published giving details of an amendment to page 28 of that document.

Eirini Dimerouki, Historic Buildings and Areas Officer, presented the report and, together with Karen Syrett, Planning and Housing Manager, responded to members questions. The Historic Buildings and Areas Officer explained that the Committee had approved public consultation on the Consultation Draft Conservation Area Character Appraisal and Management Proposals on 19 March 2018.

Fifteen responses had been received with the main concerns including:

- disagreement with the boundary on Maldon Road, which included the corner properties on Errington, Hamilton and Constantine Road but not the intervening properties;
- disagreement with the exclusion of Alexandra Road from the boundaries;
- disagreement with the inclusion of the word 'Estate' in the name, as historically inaccurate and/or unsuitable for the area's character;
- concerns about the financial implications for the Council and suggestion of alternative uses for the Council's financial resources;
- disagreement with the appraisal of the area's quality and state of preservation;
- concerns about the implications for property owners due to the designation, including the added need for planning permissions which would impede the proper maintenance of the properties.

The report provided the reasoning behind the exclusion of the majority of properties in Maldon Road and the whole of Alexandra Road and the historical development of the area on what had been the Mill Field Estate was detailed. Reference was made to correspondence with Councillor Whitehead about street trees in Errington Road and the cost of replacement. It was also explained that the use of an Article 4 Direction would require the submission of a planning application for specified categories of development which would otherwise benefit from permitted development rights and would provide for scrutiny to be given to domestic extensions and alterations to secure the preservation

and enhancement of the character and appearance of the area

The results of the consultation exercise had not generated the need for any amendments to the Character Appraisal and Management Proposals and, as such, the designation of the proposed Conservation Area could proceed as proposed.

Councillor Cope welcomed the report, noted the exclusion of some properties in Maldon Road and the whole of Alexandra Road and asked for the document to be amended to provide for their inclusion on the basis that these locations also contained examples of houses with architectural merit. He also referred to the lack of support from the County Council for the replacement of street trees.

The Historic Buildings and Areas Officer explained that the houses in Maldon Road had been excluded because they represented a type that was closer to the character of the Conservation Area 2 and it was the intention to extend the boundaries of that conservation area in due course. For the time being, however, the properties on the corners of Constantine, Hamilton and Errington Roads had been included because development on these properties would affect the Mill Field Estate Conservation Area.

Councillor Barber referred to Fixing the Link and the proposed Conservation Area around North Station Road, which had been considered at the Committee's meeting in March 2018 and asked when this would be considered again. He also referred to opportunities for dialogue with Essex County Council in relation to improving infrastructure and he supported the comments made in relation to the replacement of street trees and potential funding streams being investigated.

The Planning and Housing Manager explained that the proposed North Station Road Conservation Area would be submitted to a future meeting of the Committee when resources permitted. She also confirmed the existence of a recent consultation exercise in relation to street trees and she acknowledged the potential for street trees to enhance an area but explained that it was difficult for work to be undertaken in the highway by anyone other than the Highway Authority. She invited the Committee to consider raising this issue with Essex County Council.

Councillor Willetts referred to the decision to exclude Alexandra Road from the proposed Conservation Area and considered this to be an arbitrary one, with no real evidence to support it. He was of the view that varied architectural style would enhance the street scene in the area and asked how the decision to exclude them had been derived. He was also concerned about the implications for owners of properties with satellite dishes and parking spaces.

The Historic Buildings and Areas Officer confirmed that the determination of the boundaries of a Conservation Area could be difficult and, in this instance, the decision was made on the basis of character and strong architectural cohesion. She

acknowledged that Alexandra Road included some very interesting buildings but that the street's development had not taken place in an organised way. She confirmed that protection could be provided by a property's inclusion in the Local List. She also explained that the controls available through the Article 4 Direction would not necessarily mean that features such as satellite dishes and parking spaces would not be permitted but it would enable an assessment to be made of whether a feature was justified.

The Chairman supported the suggestion that correspondence be initiated with Essex County Council to seek guidance on the continuing planting and replacement of street trees.

Councillor Ellis welcomed the report and supported the designation of a Conservation Area on the basis of its architectural similarity and defined character. He also supported the proposal to include an Article 4 Direction and was of the view that alternative solutions to satellite dishes would now be possible, in terms of fibre broadband, which would deliver a more visually pleasing environment.

Councillor Cope explained that he was aware that residents in existing Conservation Areas had the ability to seek approval for features such as satellite dishes and solar panels and he was of the view that the system worked reasonably well. He also referred to email correspondence he had exchanged with the County Council's Chief Arboriculturalist and the Borough Council's Arboricultural Officer in relation to the replacement of street trees which he intended to circulate to the Committee members after the meeting.

The Planning and Housing Manager confirmed that, if the Committee members were concerned about the visual impact of solar panels, it would be necessary to amend the list of items excluded from permitted development in the proposed Conservation Area to include solar panels. This addition wouldn't prevent the installation of solar panels but would provide more control over them.

*RESOLVED* that –

- (i) Subject to the addition of solar panels to the list of items excluded from the permitted development rights in the Conservation Area, approval be given to proceed to the statutory designation of the proposed new Conservation Area to be known as Mill Field Estate Conservation Area, together with the inclusion of an Article 4 Direction.
- (ii) Correspondence be initiated with Essex County Council indicating the Committee's strong support for street trees and seeking guidance on measures to provide for the continuing planting and replacement of street trees.

David Cooper addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He considered the policy to be a mechanism to finance two rangers on behalf of Natural England and the RSPB. He referred to comments made by Natural England at the East Mersea caravan site appeal that signage and instructions to the public did not work and the construction of a large play area at Cudmore Grove by Essex Council which had resulted in significant traffic problems along the one-track road during school holiday periods. He considered this was typical of projects undertaken without consultation or a coherent plan. He referred to the current compilation of Neighbourhood Plans by Tiptree, Wivenhoe and Mersea which included consideration of appropriate locations for play areas. He considered this approach needed to be adopted for the proposed larger developments for open spaces, recreation spaces and leisure centres. He considered these areas would also need to provide their own community centres to provide for social cohesion with links to public transport. He referred to Mersea Island being the closest beach to Colchester and the River Blackwater and asked about the protection envisaged for recreational water craft. He confirmed that the Beach Water Quality Classification compliance for East Mersea had found no evidence of sewage pollution, however this may not always be the case with increased tourism. He also asked about the solution for unsustainable transport as a result of tourism by car to Mersea Island.

John Akker addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He confirmed that the RAMS was a matter of concern to people living on the coast and needed to be given serious consideration. He asked about the policy of the Council on consultation with the public on the implementation; the careful handling of the definition of wildlife and the environment in terms of the significant impact of visitors arriving by car on wildlife and water quality and the level of the RAMS tariff proposed, asking that it be kept under review to ensure full accountability was maintained.

The Committee considered a report by the Assistant Director Policy and Corporate giving details of a mitigation strategy to protect the internationally designated Essex Coast from the effects of increased recreational disturbance as a result of population growth throughout Essex.

Shelley Blackaby, Planning Policy Officer, presented the report and, together with Karen Syrett, Planning and Housing Manager, responded to members questions. The Planning Policy Officer explained that eleven Essex local authorities had been working together to deliver the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) which set a tariff of £122.30 per dwelling, applicable to all residential planning proposals in the borough.

A large portion of the Essex coastline was covered by various wildlife designations to protect wildfowl, wading birds and their coastal habitats. Population growth in Essex was likely to increase the number of visitors to these sensitive coastal areas, with potential

for conflict via increased recreational disturbance of the species and habitats, unless adequately managed. The Essex Coast RAMS had been designed to identify the mitigation measures necessary to address recreational impacts at the ten Habitats sites in Essex from additional residential development, focusing on management activities and behavioural change rather than any additional infrastructure, such as Country Parks. Zones of Influence (Zol) had been identified for each Habitat site and the whole of Colchester Borough was located within a Zol meaning all residential development in Colchester would be within the scope of the Essex Coast RAMS. The RAMS Supplementary Planning Document included information about the need to avoid and mitigate, the types of development covered by the RAMS, details of what the applicant needed to do and the tariff.

Councillor Ellis asked about the proposed consultation and whether the outcomes would be referred back to the Committee for further consideration. He asked about the use of the funds which would be collected, whether there would be a mechanism for local people to influence where the funds were spent and the accountability processes around that. He considered it would be an important issue for the Mersea estuary area and should be welcomed, whilst asking about the implementation of the policy in terms of the additional charge already being imposed on developers.

The Planning Policy Officer explained that the intention was for the Planning and Housing Manager to be given authority to approve minor changes to the draft Supplementary Planning Document prior to consultation but more significant changes would be submitted to the Committee for approval. In addition, once the representations to the SPD had been collated and finalised it would be submitted to the Committee for approval. She also explained that the RAMS would be governed by a Project Board with Chief Officer representation from each Local Authority effected to oversee the direction of the funding, a Steering Group with officer representation from each Authority and an Accountable Body which would be assumed by one of the Authorities, yet to be agreed, who would directly employ the Delivery Officer to manage the project. The Delivery Officer would report annually and this would be included in the Committee's Annual Monitoring Report. She further explained that there were many local organisations which knew the area well and, as such, were invited to recently held workshops where much useful information was gathered and would be used to develop the project moving forward.

Councillor Willetts agreed with the principles of the RAMS in terms of mitigation of very sensitive areas. However, he was concerned about the Committee's policy to pursue increase growth across the borough which would have a damaging impact on the coast and other sensitive areas. He also considered these were two mutually exclusive policies and an inevitable impact on the wildlife and environment would take place. He referred to the consultation, the Zones of Influence (Zol) and the proposed £122.30 tariff per dwelling on each planning application. He asked how the level of the tariff was arrived at and considered this had been undertaken on an arbitrary basis. He was of the

view that a sensitivity analysis should have been undertaken which have concluded that a smaller Zol with a larger tariff was more appropriate. He also questioned the inclusion of Braintree and Chelmsford within the Zol, given neither Authority contained any coastal areas within their boundaries, whilst Uttlesford had not been included.

The Planning Policy Officer confirmed that the purpose of the RAMS was to mitigate likely and significant impacts of future development. She also confirmed there may be a need for bespoke mitigation in relation to specific sites which would be applied in addition to the tariff. The boundaries of the Zol had been derived from desktop studies, visitor surveys and workshops with interested bodies. She confirmed that Braintree and Chelmsford had accepted the need for the tariff and were already collecting contributions on the basis that the pull of the coast was strong for residents in their areas. She considered the proposed tariff to be fair and proportionate. She also confirmed that a small part of Uttlesford District Council fell within the Zol and discussions were taking place regarding its potential inclusion.

The Chairman referred to the play area at Cudmore Grove which he welcomed on the basis that children needed to be encouraged to play outdoors.

Councillor Cope referred the views of the Highway Authority in relation to traffic impact from developments such as the play area at Cudmore Grove and the historical features located along the sea wall from Cudmore Grove and his concern about the defence of the coastline from the sea and the lack of commitment for residents to defend against erosion from the sea.

Councillor Fox welcomed the RAMS in terms of the impact on the coast and the further impact from additional development. He referred to the strategy duration of 20 years and asked when the process would be implemented and when it would be reviewed. He was mindful that within that period further changes would have taken place, the impact of which would need to be further assessed.

The Planning Policy Officer confirmed that she was aware that the Environment Agency were working on matters related to sea erosion but this was outside the scope of the RAMS. She confirmed that the RAMS would be continually reviewed by the Delivery Officer once in post, prioritising projects identified by the Project Board. Visitor surveys would be undertaken on a 5-year basis and an annual report would be submitted which would be included in the Committee's Annual Monitoring Report.

Councillor Barber welcomed the report but was concerned regarding the process in terms of the potential for the decision making to be slowed unnecessarily. He asked how long it was likely to be between the completion of a development and the delivery of a project.

The Planning Policy Officer confirmed that the initial costs would be utilised to employ



the Delivery Officer, followed by a Ranger, responsible for monitoring the sensitive areas. However, it would be difficult to associate and identify a tangible project to a specific development.

Councillor Ellis also referred to the impact of sea erosion and the need for breaches to be defended which he considered to be an important issue. He also referred to the Shoreline Management Plan and whether details of this could be shared with the Committee members. He also sought clarification regarding a comment made in relation to RSPB receiving funds via the RAMS.

The Planning Policy Officer confirmed that the RSPB had been involved in the project and attended one of the workshops but it would not be receiving money through the RAMS. She agreed to look into the current status of the Shoreline Management Plan and would update the Committee members accordingly.

The Planning and Housing Manager explained that the reference to potential for entering into Unilateral Undertakings was not something they had expected developers to actually do, with the intension being that the payment of the tariff would simplify the process. She also confirmed that the tariff would be paid up front so that mitigation would be in place prior to the occupation of each dwelling.

Councillor Warnes welcomed the report and asked whether the Ministry of Defence had been included as one of the participants who contributed to the drafting of the strategy.

The Planning Policy Officer confirmed that representation from the Ministry of Defence had been invited to one of the workshops.

*RESOLVED* that -

- (i) The Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) Supplementary Planning Document be approved for consultation and the contents of the RAMS Strategy Document (Technical Report and Mitigation Report) be noted;
- (ii) Authority be delegated to the Planning and Housing Manager to make minor changes to the Supplementary Planning Document, should it be necessary, and any changes considered to be more than minor by the Planning and Housing Manager, in consultation with the Group Spokespersons of the Committee, will be reported back to the Committee prior to the consultation commencing.



# Local Plan Committee

Monday, 08 April 2019

**Attendees:** Councillor Christopher Arnold, Councillor Lewis Barber, Councillor Nigel Chapman, Councillor Nick Cope, Councillor John Elliott, Councillor Andrew Ellis, Councillor Adam Fox, Councillor Gerard Oxford, Councillor Martyn Warnes

**Substitutes:** Councillor Andrea Luxford Vaughan (for Councillor Phil Coleman)

**Also Present:**

## 162 Have Your Say!

Sir Bob Russell addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He referred to the recent closure of the former REME workshops in Flagstaff Road which he considered created an opportunity for the Council to consider the acquisition of the building, given its location close to the site of the Roman Circus in order for it to become a national visitor attraction. He also mentioned Salary Brook and its vulnerability to an application being made by Gladman Estates, given the company's recent activity in Colchester and surrounding areas. He also asked for an update on the Middlewick Ranges site and he was also of the view that the proposed North Station Road Conservation Area needed to include Colne Bank Avenue and Albert Street.

John Akker addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He agreed with the comments made in relation to the activity of Gladman Estates. He welcomed the invitation he had received to the North Essex Engagement Event which had been very successful in providing additional information about the Local Plan and the long-term direction of the Borough and he praised the officers who had organised it. He also welcomed the attendance of the Clinical Commissioning Group at the meeting as there were important medical issues to be addressed, in particular in relation to access to GP appointments and he referred to pessimistic consultation responses from statutory consultees in relation to this matter.

Councillor T. Young, Portfolio Holder for Business and Culture attended and, with the consent of the Chairman, addressed the Committee. He referred to the Check and Challenge Workshop / Engagement Event and agreed with the positive comments made by Mr Akker. He confirmed that, due the current pre-election period, information from the event would be circulated more widely after 2 May 2019.

**163 Local Plan Committee Minutes 17 December 2019**

The minutes of the meeting held on 17 December 2018 were confirmed as a correct record.

**164 Local Plan Update**

Tom Foster, Chairman of the Campaign Against Urban Sprawl in Essex (CAUSE), addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He referred to a resolution made by the Committee in September 2018 approving Garden Community proposals subject to necessary infrastructure being confirmed, the proposals proven to be financially viable and environmentally sound and including constructive engagement with local communities. He also referred to the clause relating to the triggering of a review of the Local Plan if the necessary strategic infrastructure had not been agreed within a reasonable period of time. He went on to mention manifestos for the forthcoming local election including reference to the need for a review of the Local Plan. He compared the decision making at Braintree District Council and the Council Leader's approval of the Inspector's Option 2, with the submission of new evidence and results of consultation in early 2019. He hoped that after the election, the Committee would revert to the acceptance of the Inspector's option 1.

Ian Vipond, Executive Director, responded to the representations made by speakers under the have Your Say! Arrangements and provided a verbal update on the current situation in relation to the Local Plan. He explained that updates were supplied to the Inspector every month with the latest being issued at the start of April which was available on the website hosted by Braintree District Council. He explained that a legal opinion on behalf of the North Essex Authorities had been issued to the Inspector, in response to the opinion of Martin Edwards, on behalf of CAUSE. A second opinion, relating to issues raised by Lightwood Strategic, was being sought and would be available shortly. He also explained that the Housing Investment Fund (HIF) bids had been submitted by Essex County Council for improvements to the A12 and the provision of a link between the A133 and the A120 and the first phase of the Rapid Transport Scheme in the Tendring/Colchester borders locality. It had initially been envisaged that a period of approximately three months would be required for the Government to consider the bids. He welcomed the positive feedback received on the workshop events on the Sustainability Assessment which had been managed by LUC and to which around 60 invitations had been issued. He confirmed that LUC were now working on the Stage 1 sites and the workshop information before bringing their conclusions together for submission to the Committee. He explained that the time to review a Local Plan was after one was in place and the wording in the Committee's previous decision making was in relation to what would trigger such a review.

Karen Syrett, Planning and Housing Manager, referred to Middlewick and explained that

an update meeting with the Ministry of Defence was due to take place in 10 days' time, bearing in mind the disposal of the site had been put back by 12 months. She was hoping the meeting would be an opportunity to agree arrangements for public engagement. She confirmed more close working relationships with various health bodies and regular meetings were taking place reviewing various planning issues.

Councillor Luxford Vaughan asked for an explanation on state aid regulations and how it worked with a Local Development Corporation and Councillor Barber asked for the advice on this matter to be shared with the Committee members. Councillor Luxford Vaughan also asked for a summary of Sustainability Appraisal responses to be made available as well as a copy of the HIF bids. She also asked about the timing for the viability work to be completed.

The Executive Director explained that this related to legislation to ensure no company obtained an advantage from being funded by the state, that is to ensure fair competition between businesses. He explained further that Development Corporations had been in existence for many years with state funding being provided to ensure a project could achieve approval and proceed. He also explained that formal advice would not be completed until the base level viability had been confirmed. He confirmed that a commitment had been made to make the responses received public, LUC would undertake an assessment of the Sustainability Appraisal responses and would form a technical evaluation of the impact on their thinking. He explained that the HIF bids had been submitted by Essex County Council and he would need to find out whether these had been published. He also explained that multiple elements impacted on the viability work and, as such, he was not currently aware of the status of that work but he was committed to bringing the evidence back to the Committee in the context of a series of briefing sessions which would be taking place in June and July 2019.

Councillor Ellis referred to the Check and Challenge workshops and regretted that Local Plan Committee members had not been given the opportunity to attend and asked for similar events in the future to include such invitations to the three North Essex Authorities.

Councillor Barber welcomed the setting up of informal briefing sessions and was of the view that they would be a valuable way to discuss some of the update information in more detail, including some of the information which may not be ready for release publicly.

*RESOLVED* that the Executive Director and the Planning and Housing Manager be thanked for presenting the update information.

## **165 Presentation on Plans for Improving Health Services in North Essex**

**Councillor Ellis (in respect of his spouse's employment by the North Essex**

**Wheelchair Service) declared a non-pecuniary interest in this item pursuant to the provisions of Meetings General Procedure Rule 7(5).**

Laura Chase, Planning Policy Manager, introduced Chris Howlett (Programme Director) and Jane Mower (Estates Development Manager) at the North Essex Clinical Commissioning Group to the Committee members.

The Committee received a presentation from the Programme Director and Estates Development Manager on plans for improving health services in North Essex, highlighting the current comprehensive approach to incorporating health into future development. The health service had needed to adapt to a number of recent challenges including:

- Year on year growth in demand for services outstripping increase in funding
- Ageing population with more complex health needs
- Population growth/housing development
- Changing public expectation of service standards
- Changing health needs (obesity, diabetes, COPD, mental health, dementia)
- Workforce recruitment and retention not keeping up with demand
- Political and structural instability.

The presentation explained how these challenges were being responded to through new organisational structures and long-term strategies. In particular, the Hub and Spoke model of delivery was presented which was intended to tailor the delivery of health services to the needs of local areas.

Councillor Arnold sought clarification on the reason why there was a limit to the number of development proposals on which representatives could be made as health statutory consultees.

The Planning and Housing Manager explained that the Community Infrastructure Levy Regulations provided for a limit of five comments and that the removal of this limit had been part of a recent consultation which were now subject to the publication of secondary legislation.

Councillor Luxford Vaughan asked whether the Estates Development Manager had been involved in the submission of the response to the LUC consultation and expressed her extreme concern in relation to the remarks referring to the impact on health services being inadequately addressed and that no new primary health care facilities would be provided. She also referred to the cultural shift which would be required to move patient care to new digital solutions and how this would work in a tangible sense. She also asked about the traffic implications of the Hub and Spokes model as a consequence of people travelling further.

The Estates Development Manager explained that she co-ordinated all health-related responses in relation to the Garden Communities and Section 1 proposals. She

confirmed that the three North Essex Authorities had acknowledged the health-related response to the consultation.

The Programme Director also explained that large scale development had a wider impact on health services and it was not just about providing additional primary care. He went on to explain that the Hub and Scope concept in reality would provide new facilities with a range of services in some areas but in other places there would be a reliance on existing health care practices which would need to be adapted to accommodate a range of services, dependent upon the needs of the area. He further explained the rapid growth in online care which targeted the healthy younger population who preferred to access care while on the move and around their working lives. It was envisaged that this growth in new technology solutions would free up capacity within the existing health premises for those that needed face to face consultation and even where populations were growing.

The Executive Director explained that the key part of the Sustainability Appraisal (SA) was about making places healthy first before thinking about how people would be treated. He considered that primary health was being used within the SA as a mechanism of health provision rather than an assessment of the nature of health provision going forward. He also confirmed his view that the SA could make certain assessments currently but it couldn't take account of the significant impact of the scale of new technology going forward. He considered that the real significant change to be made was the creation of healthier places to live.

Councillor Barber welcomed the presentation, explaining his sceptical view about the Garden Communities proposals and the presentation had helped his understanding of the health-related issues. He asked what contributions the Council could make towards preventable health measures and hoped the exchange of information from the Clinical Commissioning Group would continue.

Councillor Ellis welcomed the presentation from the North Essex Clinical Commissioning Group, he hoped it may become a regular exchange of information and he was encouraged to learn that there was now a good point of contact for Local Plan related issues. He questioned the assertion that GP recruitment could be assisted as a consequence of the growth in virtual health treatment and welcomed an explanation of recruitment measures and whether sponsorship had been considered. He asked about the Urgent Treatment Service proposed to be located at the front of the hospital and questioned how this would work given the proximity of the car park which was heavily over-subscribed.

The Programme Director explained that GP recruitment remained a current problem and that a range of different initiatives were being considered to reduce the gaps, including working with practices investing in a recruitment website and training, work with NHS England with international recruitment and working on a patient navigation approach to

ensure only those who need to see a GP do so, although this required a significant level of culture change to be successful. He explained that it was envisaged that the patients who currently attended the Colchester Primary Care Centre at the Walk in Centre would attend the Urgent Treatment Service and he did not consider this would create a significant impact and the hospital had introduced a range of new parking controls, improved capacity as well as the new Park and Ride bus stop provision. He also explained that the development proposals which were due to commence at the hospital included a complete re-modelling of the entrance area, including utilisation of part of the duck pond.

Councillor Ellis was of the view that a more sensible solution would have been to move the hospital within close proximity to the A12 and asked if this had been explored. He also about a reference to new Essex Design Guide principles and whether this version had been adopted by this Council. He went on to confirm he would be very pleased to receive further updates from the North Essex Clinical Commissioning Group and was very encouraged that positive working relationships had now been developed with health service representatives.

The Programme Director explained that Colchester Hospital was built in 1985 and it was apparent early on that the site would become constrained due to housing development. The Trust had looked at the feasibility of developing a new hospital under a Public Funding Initiative (PFI) but this had been rejected because of the costs. He further explained that large capital sums were no longer available due to the long-term viability concerns associated with PFI projects and projects involving the building of 'super' hospitals had problems in themselves such as accessibility problems and public consultation protests.

The Planning Policy Manager confirmed that the Essex Design Guide was an online document which was subject to changes and updating over time and, as such, was no longer a document which was subject to formal adoption.

The Estates Development Manager confirmed that Laura Taylor Green at Essex County Council and part of the Strategic Planning Group was able to provide an excellent presentation on the Essex Design Guide should the Panel members be interested.

Councillor Warnes was of the view that the discussion had confirmed his support for an infrastructure led approach whilst also acknowledging the difficulties for people currently trying to access health services. He supported innovative and creative solutions but delivery was subject to delivery on the ground. He referred to Colchester's long time acknowledged aging population and associated funding issues. He also referred to areas of deprivation in the Borough and the importance of preventative health measures as well as the importance of adequate social and primary care funding. He supported the use of new technology in terms of assistive and adaptive innovations, however, he advocated a more widespread fibre broadband network solution in order to deliver these



innovations. He also referred to his varying experiences of GP surgeries and the impact of restricted appointment access leading to people considering self-care as an easier option. He supported the need to build healthy places to live.

The Programme Director explained that the fibre broadband revolution was only a part of the solution to improved health services due to the mix in ability to use IT. He acknowledged that older people can use IT effectively in order to access healthcare but this was not the case for all. He also explained that many people would be accessing healthcare from their mobile phones rather than using broadband, although he accepted that health services were investing heavily in broadband infrastructure and were also improving IT practices to provide access from any health care building for any type of worker to improve portability and access to information. He also responded to comments about current access problems associated with growth in demand and the environmental impact on a person's health and wellbeing, such as whether they have company, transport etc. He advocated a collective approach to address inequalities together with a multi-faceted approach to enable that to happen.

Councillor Cope also welcomed the presentation. He referred to the amalgamation of GP practices and whether this was a welcome way forward as well as healthy environments in terms of the need for new housing for young families to provide gardens larger than the minimum area to achieve policy compliance. He strongly advocated the need for larger gardens to benefit the health of young children and asked how this could be addressed given current policy restrictions.

Councillor Warnes also referred to the Government's recent initiative to extend permitted development in respect of the change of use of office space to residential use and the problems associated with lack of amenity space as a consequence. He also lamented the lack of control that the Local Authority had in relation to this practice.

The Programme Director explained that the amalgamation of hospitals had produced some successes but not in all cases. The Ipswich and Colchester amalgamation was in its early years and it remained to be seen whether the merger would produce patient benefit, cost savings and efficiencies. In terms of GP practices, a new Government initiative had recently been implemented providing for all GP practices to join a primary care network which would lead to more sharing of resources across practices and it remained to be seen whether this arrangement would prove to be successful. He explained that he worked closely with public health colleagues to provide for healthy spaces in new developments through the Essex Design Guide.

The Planning Policy Manager explained that the Council had recently been awarded £250,000 to undertake an air quality project, which was one of a range of initiatives which would come forward.

The Planning and Housing Manager explained that minimum garden sizes were

specified in the Essex Design Guide but these minimum standards weren't prescriptive, dependent upon location. There were also local policies which might be different to the Essex Design Guide, which had not been adopted in its entirety, rather, elements of which were utilised according to what was considered appropriate for Colchester.

The Chairman referred to the Lifetime Homes provisions within the Essex Design Guide and his experience of external ramps for wheelchair users being constructed with unsafe gradients and the need for those involved in implementing and designing dwellings for people with disabilities to have actual experience of living as a disabled person.

The Estates Development Manager acknowledged the concerns expressed in relation to design and implementation of Lifetime Homes and the need for people from the local community to be involved in the design of community infrastructure. She was also of the view that the Garden Communities projects would provide opportunities to involve local people in the master planning of the homes and to have patients involved in health care decision making.

*RESOLVED* that the contents of the presentation be noted and Chris Howlett and Jane Mower be thanked for their very informative attendance.

## **166 Colchester Conservation Area No 4 North Station Road and Environs Designation**

The Committee considered a report by the Assistant Director Policy and Corporate seeking authority to proceed to the statutory designation of the proposed Conservation Area No 4 to be known as North Station Road and Environs. The North Station Road and Environs Conservation Area Appraisal and Management Plan document was attached to the report.

Eirini Dimerouki, Historic Buildings and Conservation Areas Officer, presented the report and, together with Simon Cairns, Development Manager, responded to members questions. The Historic Buildings and Areas Officer explained that the Committee had approved public consultation on the Consultation Draft Conservation Area Character Appraisal and Management Proposals on 19 March 2018.

Three responses had been received, none of which had required (other than a technical correction) any revisions or amendments to the Consultation Draft of the Conservation Area Appraisal and Management Proposals document or the Belle Vue Road, Northern end of North Station Road and Digby House and adjacent Riverside Addendum. As such, the designation of the proposed Conservation Area could proceed based on these documents.

The Historic Buildings and Conservation Areas Officer explained that an amendment to the boundary of the Conservation was proposed in order to include properties in Belle Vue Road and North Station Road between the Albert and Essex Hall Roundabouts, in

accordance with the delineation illustrated in the map circulated at the meeting. It was further proposed that the residents affected by the amendment would be consulted for a period of 21 days and, subject to no objections being received, the designation of the Conservation Area would proceed.

The Development Manager also confirmed the benefits of extending the boundary, as commented upon earlier in the meeting by Sir Bob Russell.

Councillor Barber supported the Conservation Area proposals and referred to previous comments he had made previously in relation to shop front issues and excessive amounts of street furniture which caused obstructions along the cycleways in certain parts of the area. He asked if representations could be made to Essex County Council to look into the street furniture issue, particularly in relation to the Fixing the Link project between the town centre and North Station, and whether discussions could take place with shop owners and including ward councillors, to improve some of the frontages.

Councillor Arnold also welcomed the report as well as the proposed boundary extension to the north. He asked for clarification regarding the process for including additional roads in the Conservation Area and sought an assurance that the matter would be brought back to the Committee, should any objections be received in response to the consultation.

Councillor Fox asked about progress to secure funding opportunities to support the enhancement of North Station Road and some properties in North Station Road.

Councillor Cope commented on the poor response rate to the consultation and asked about the expected benefits of the proposed Conservation Area designation.

The Historic Buildings and Conservation Areas Officer explained that the area was quite sensitive with properties of special interest and others associated with commercial activity and, as such, it was thought to be beneficial to have a level of control to avoid further detrimental development. It was also an important link between the railway station and the town centre deserving of special care and opportunities for improvement.

The Chairman welcomed the inclusion of the memorial and the former open-air swimming pool.

Councillor Ellis thanked the Historic Buildings and Conservation Areas Officer for her excellent presentation and also supported the potential to pursue funding opportunities to support enhancements.

*RESOLVED* that approval be given to proceed to the statutory designation of the proposed new Conservation Area to be known as Colchester Conservation Area No 4: North Station Road and Environs, including the proposal to include Belle Vue Road and

that part of North Station Road between the Albert Road and Essex Hall roundabouts, subject to the associated consultation with residents directly affected being satisfactory.

# Local Plan Committee

Wednesday, 22 May 2019

**Attendees:** Councillor Lewis Barber, Councillor Nick Barlow, Councillor Tina Bourne, Councillor Phil Coleman, Councillor Andrew Ellis, Councillor Chris Hayter, Councillor Patricia Moore, Councillor Beverley Oxford, Councillor Lee Scordis

**Substitutes:** No substitutes were recorded at the meeting

**Also Present:**

## 167 Appointment of Chairman

*RESOLVED* that Councillor Barlow be appointed Chairman for the forthcoming Municipal Year.

## 168 Appointment of Deputy Chairman

*RESOLVED* that Councillor Scordis be appointed Deputy Chairman for the forthcoming Municipal Year.



22 July 2019

<b>Report of</b>	<b>Assistant Director of Policy &amp; Corporate</b>	<b>Author</b>	<b>Karen Syrett &amp; Chris Downes</b>
<b>Title</b>	<b>Update to Local Plan and Evidence Base</b>		<b>☎ 506477</b>
<b>Wards affected</b>	All		

## 1. Executive Summary

- 1.1 In October 2017, the North Essex Authorities submitted their Local Plans to the Secretary of State to begin the formal process of Examination in Public.
- 1.2 Section 1 of the submitted Local Plan ('the Section 1 Plan') sets out an overarching strategy for future growth across Braintree, Colchester and Tendring – the 'North Essex Authorities' ('NEAs'). As well as including policies setting the overall housing and employment requirements for North Essex up to 2033, the Section 1 Plan proposes three new cross-boundary 'Garden Communities' along the A120 corridor with the potential for longer-term and comprehensively-planned growth. In contrast, the 'Section 2' Plan for each of the three North Essex Authorities contains more specific local policies and proposals relevant only to their individual administrative area.
- 1.3 Before a Local Plan can be formally adopted it must be examined by a government-appointed Inspector whose job it is to ascertain that 1) the plan has been prepared in line with various legal requirements and 2) that the policies and proposals in the plan comply with the 'tests of soundness' contained within the National Planning Policy Framework (NPPF). Examination hearings for the Section 1 Plan took place between January and May 2018; and in June 2018 the Inspector wrote to the NEAs setting out his initial findings. Whilst he confirmed the legal compliance and soundness of some elements of the plan and praised the NEAs' innovation and ambition, the Inspector found some of the evidence and justification in support of Garden Communities to be lacking and was therefore unable to find the Section 1 Plan sound.
- 1.4 In his letter, the Inspector offered the NEAs advice and options for how best to proceed. Having considered his advice, the NEAs in October 2018 confirmed that they remained committed to using Garden Communities principles to secure the future housing requirements in North Essex and would produce additional evidence to address each of the Inspector's concerns. On the 10th December 2018, the Inspector confirmed that he was satisfied that the proposals for further work on the evidence base satisfactorily responded to the points he had raised as identified issues. At this point the Inspector formally paused the Examination until the NEAs' further work on the evidence base and the Additional Sustainability Appraisal was completed. Monthly updates have since been submitted to the Inspector on the programme timetable as requested.
- 1.5 The additional evidence has now been completed and the findings are detailed within the main body of this report at Section 5.
- 1.6 As well as producing the evidence in response to the Planning Inspector's concerns about Garden Communities, the North Essex Authorities have also compiled a table of proposed

'modifications' to the Section 1 Plan. These modifications are aimed at addressing certain issues identified by the Inspector, partner organisations and objectors to the Plan and ensuring the plan meets the tests of soundness. Many of the proposed modifications arose from suggestions and discussions at the Examination hearings in 2018 and the Inspector's interim findings whereas others arise from the findings of the additional evidence base.

- 1.7 Importantly, Officers are not recommending any substantial changes to the strategy for growth as set out in the Section 1 Local Plan. The additional evidence prepared in response to the Inspector's original concerns demonstrates that the establishment of three Garden Communities in the broad locations already identified in the plan is justified and represents an appropriate, sustainable and deliverable strategy.
- 1.8 It will be the Inspector's decision whether or not to accept the proposed modifications to the Local Plan through the resumed Examination process. Section 20(7C) of the 2004 Act provides that the Inspector must (if asked to do so by the local planning authority) recommend modifications to the Local Plan that would ensure its legality and soundness. Therefore, additional modifications could be suggested by the Inspector through the Examination process.
- 1.9 It is proposed that the Additional Sustainability Appraisal and all of the additional new evidence base documents along with the table of proposed modifications are published for six weeks public consultation between 19th August and 30th September 2019 before they are submitted, along with people's comments, to the Planning Inspector to enable him to resume the Examination. It is expected that the further Examination hearings will take place in November/December 2019.

## **2. Recommended Decisions**

- 2.1 The Local Plan Committee is asked to resolve that:
  - a. The additional evidence base contained within Appendices 1 to 12 of this report [or listed as background papers] is accepted as part of the evidence base to support Section 1 of the submitted Local Plan which contains strategic planning policies and proposals common to the North Essex Authorities of Braintree, Colchester and Tendring;
  - b. It agrees that the evidence base (including the additional evidence) supports the existing spatial strategy for growth in the submitted Local Plan proposing three cross-border Garden Communities and is justified as being the most appropriate strategy;
  - c. It approves the Additional Sustainability Appraisal (SA) work (attached as Appendix 1) and it considers and takes account of the findings of the additional SA work which appraises the submitted Local Plan strategy for three cross-border Garden Communities and the realistic alternatives to this strategy;
  - d. It approves the schedule of proposed modifications to the Local Plan (attached as Appendix 12);
  - e. It agrees a six week public consultation on the schedule of proposed modifications, the Additional Sustainability Appraisal and the additional evidence base be undertaken, starting on 19 August 2019 and ending on 30 September 2019;
  - f. Following the period of consultation, the above documents along with any duly made representations received during the consultation period, be submitted to the



Secretary of State to enable the Local Plan Inspector to resume and complete the Examination of the Section 1 Local Plan and recommend any further changes to the Publication Draft Local Plan as necessary to make it sound.

- g. To note that the evidence base confirms the need for the infrastructure contained in the current HIF Bids submitted by Essex CC with regard to the North Essex Garden Communities and as currently being considered by Government and that the Councils would expect a decision on those Bids before submitting further evidence to the Secretary of State under recommendation 2.1.f above.

### **3. Reason for Recommended Decision**

- 3.1 To enable the Local Plan Examination to resume.

### **4. Alternative Options**

- 4.1 The alternative course of action available to the Council is withdrawing the plan and then starting the plan-making process from the beginning. However, significant time and resource has been applied to producing the evidence following committee approval of the current option in October 2018. Failure to resume the Examination would mean this time and money would have been wasted. It would also jeopardise the Housing Infrastructure Funding applications (HIF bids) that are being considered by Government and amount to £328m potential funding for infrastructure. It would also mean starting the Local plan process again delaying adoption by several years and leaving the Council vulnerable to 'planning by appeal'.
- 4.2 Officers recommend continuing with the Examination as it provides the "best opportunity" to protect government funding applications and ensure a robust and demonstrable housing land supply.

## **5. Background Information**

- 5.1 In October 2017, the North Essex Authorities submitted their Local Plans to the Secretary of State to begin the formal process of Examination. The Secretary of State then appointed a Planning Inspector, Mr Roger Clews, to undertake the Examination of the shared Section 1 Local Plan.
- 5.2 Following the Examination hearing sessions, the Councils received three letters from the Local Plan Inspector containing interim feedback on the soundness and legal compliance of the Section 1 Local Plan. The first letter dated 8 June 2018 set out the Inspector's initial findings mainly in respect of legal compliance and the soundness of the Garden Community proposals. The second letter dated 27 June 2018 set out the Inspector's findings in respect of the need for new homes. The third letter dated 2 August 2018 contained the Inspector's response to questions of clarification raised by the NEAs in respect of the Inspector's first letter. The contents of these letters were all reported to Members at the time.
- 5.3 Overall, the Inspector was satisfied that the NEAs had complied with the legal duty to cooperate and other legal and procedural matters and was also satisfied that the overarching employment and housing targets in the plan had been justified on the basis of sound evidence. He also praised the Authorities for their innovation and ambition in promoting three new Garden Communities and stated that if carried out successfully it has the potential to provide for housing and employment needs not just in the current Plan period but well beyond it.
- 5.4 However, the Inspector found the evidence provided to support the Garden Communities was lacking in a number of respects. The main areas of concern the Inspector raised, related to:
- Sustainability Appraisal – the Inspector questioned the objectivity of the appraisal and raised concerns that it was biased in favour of the NEAs preferred strategy.
  - Strategic road improvements – in particular the lack of certainty over the delivery, timing and funding of the A12 and A120;
  - Rapid Transit System - the Inspector asked for more details relating to the feasibility of delivering the system (including route options) as well as the system's commercial viability
  - Build out rates – the Inspector raised concerns over the level of evidence to support housing delivery higher than 250 dwellings per year at the Garden Communities;
  - Employment provision – the absence of any indication as to how much employment land would be provided as part of the new Garden Communities was asked to be addressed;
  - Viability – in particular the assumptions used in the original assessment relating to transport infrastructure costs, land purchase and interest costs, and contingency allowances.
  - Delivery mechanisms – in respect of the NEAs approach to delivering Garden Communities through the formation of a locally-led New Town Development Corporation and whether the development could be delivered through other alternative methods.
- 5.5 In summary, the Inspector identified a number of key issues about the viability and deliverability of the Garden Community proposals and the way in which the NEAs had selected the strategy of Garden Communities over other reasonable alternatives in the

Sustainability Appraisal. Due to this, he was unable to find the Section 1 Local Plan sound. Instead, the Inspector provided the Authorities with three options for how to progress the Local Plan towards adoption.

- 5.6 Option 1 would have involved removing Garden Communities from the Local Plan and proceeding with the Examination of Section 2, so long as the Local Plan was reviewed again within 2-3 years (at which point the evidence in support of Garden Communities might have been stronger). Option 2 effectively meant undertaking more work to fill the gaps in the evidence and pausing the Examination of Section 2 until the Inspector had been satisfied that the Garden Communities were deliverable, and that Section 1 of the Plan was sound. Option 3 would have meant withdrawing the Local Plan and starting the process again.
- 5.7 On 22nd October 2018, the NEAs wrote to the Inspector to advise him that the Councils remained committed to using Garden Communities principles to secure the future housing requirements in the North Essex Authorities area and would provide the further evidence requested by the Inspector including evidence on:
- the availability of funding for the necessary strategic infrastructure;
  - the financial viability of the proposed communities;
  - the environmental effects, including transport issues;
  - employment provision within the Communities (and elsewhere); and
  - continuing engagement with local communities.
- 5.8 The Councils also committed to reviewing the original Sustainability Appraisal which informed original decisions on the choice of spatial strategy in the Local Plan, to ensure that it considered a full range of reasonable alternatives to the Garden Communities, at a range of different sizes. Importantly, the Councils committed to reviewing all the above evidence before submitting it to the Inspector and before any further consultation – to see whether any changes to the plan or the overall strategy were necessary.
- 5.9 The following part of this report covers the Additional Sustainability Appraisal commissioned by the NEAs to address the Inspector's concerns on the original Appraisal. The report then addresses other updates.
- 5.10 The role of Sustainability Appraisal (SA)  
The strategy for growth or 'spatial strategy' in the Section 1 Local Plan includes the establishment of three Garden Communities along the A120 corridor to deliver long-term growth within the current plan period to 2033 and beyond. One of the tests of soundness is to ensure that the plan and its spatial strategy is 'justified'. To be justified, the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. The Sustainability Appraisal (SA) is a legal requirement and key piece of evidence designed to test different policies, proposals and alternative strategies and to inform the decisions a planning authority takes when choosing its strategy for growth.
- 5.11 The purpose of the SA is to ensure that potential environmental effects are given full consideration alongside social and economic issues. SA is also a legal requirement and should be undertaken at each of the key stages of the plan making process. Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out an SA of each of the proposals in a Local Plan and the consequence of reasonable alternatives, during its preparation. More generally, section 39 of the Act

requires that the authority preparing a Local Plan must do so “with the objective of contributing to the achievement of sustainable development”. SAs also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the ‘Strategic Environmental Assessment Regulations’), which implement the requirements of the European Directive 2001/42/EC (the ‘Strategic Environmental Assessment Directive’) on the assessment of the effects of certain plans and programmes on the environment.

**5.12 The Inspector’s concerns about the original SA and suggestions for further work**

In his June 2018 letter (paragraphs 93-129) the Inspector raised a number of concerns about the previous SA prepared and submitted alongside the Section 1 Local Plan. He firstly questioned the objectivity of the assessment; concluding that its authors had made optimistic assumptions about the benefits of Garden Communities and correspondingly negative assumptions about the alternatives, without evidence to support many of those assumptions - thus he felt that the assessment lacked objectivity and was unreliable. He secondly questioned the rationale behind the choice of alternative strategies that were tested as part of the assessment and identified a lack of clarity in the description of the alternatives and why they were tested at certain scales – making it difficult for the public to understand the alternatives and to give an effective opinion. Thirdly, the Inspector questioned the combinations of sites that were tested, in particular the reasons for excluding of the alternative ‘Monks Wood’ development proposal from Lightwood Strategic as an option for testing in combination with other Garden Communities. Because of the shortfalls identified in the previous SA, the Inspector concluded that the choice of three Garden Communities as part of the preferred spatial strategy had not been properly justified and it had not been demonstrated that the chosen strategy was the most appropriate when considered against the reasonable alternatives.

5.13 In advising the NEAs on how to proceed, the Inspector provided some suggestions in his letter as to how the shortcomings in the SA might be rectified. He first suggested (paragraph 122) that before embarking on any Additional SA work the NEAs re-examine the evidence base for any Garden Community proposals they wish to assess, especially with regard to viability, the provision of transport infrastructure and employment opportunities, in order to ensure that they have a sound basis on which to score them against the SA objectives. As explained elsewhere in this report, additional evidence in respect of each of these subjects has now been prepared.

5.14 The Inspector also advised (paragraph 123) that Additional SA work must be an objective comparison of individual Garden Community site options at a range of different sizes, insuring (in particular) that the Monks Wood proposal is assessed as an alternative at an appropriate scale. Adequate reasons (paragraph 124) would have to be given for taking forward or rejecting certain options from the first stage of the assessment. In the second stage of the assessment, the Inspector (paragraph 125) would expect an assessment of alternative spatial strategies for the Plan area including, as a minimum, the following:

- Proportionate growth at and around existing settlements;
- CAUSE’s Metro Town proposal; and
- One, two or more Garden Communities (depending on the outcomes of the first-stage of the assessment).

The Inspector also advised (paragraph 128) that different consultants be used to undertake the Additional SA work than the authors of the previous SA to help ensure that the further work is free from any earlier influences and is therefore fully objective.

5.15 Methodology for the Additional Sustainability Appraisal

Independent consultants LUC have been appointed to undertake the Additional SA advised by the Inspector. The methodology that LUC has applied takes on board the Inspector's advice and was the subject of consultation in its own right with statutory consultees, other partner organisations and participants in the Local Plan Examination (including campaign groups and site promoters). The methodology has also been shared with the Inspector himself to allow him the opportunity to indicate any suggestions or concerns with the Additional Sustainability Appraisal [SA] Method Scoping Statement. In his letter in December 2018, the Inspector confirmed he was satisfied with the approach being adopted. There has also been engagement between LUC and various stakeholders in the form of meetings, a 'check and challenge workshop' and requests for information from alternative site promoters which have all helped to ensure that the assessment is as robust, and transparent, as possible.

5.16 The methodology for the Additional SA work has followed a two-stage process – the first involving an assessment of a range of potential development sites throughout North Essex at different scales of development; and the second involving an assessment of different 'spatial strategy' alternatives derived from different combinations of those sites, ensuring that the alternatives identified specifically by the Inspector are tested.

5.17 All sites and spatial strategy alternatives are assessed against the established 15 sustainability objectives which include creating safe, cohesive communities; meeting housing needs; achieving more sustainable travel behaviour; conserving and enhancing wildlife and geological sites; improving air quality; conserving and enhancing landscape quality; and safeguarding and enhancing soil quality and mineral deposits.

5.18 Options tested

The alternative spatial strategy options tested as part of the Additional SA work have been derived following some key principles to ensure they represent a good range of reasonable alternatives. The principles include: ensuring all options meet the required housing need in the plan period to 2033; reflecting the relative housing need and commuting patterns as they affect different parts of North Essex; and ensuring alternative strategies are coherent, logical and reasonable. 17 spatial strategy options have been tested which comprise 11 options for the area of North Essex to the west of Colchester (mainly affecting Braintree district) and 6 options for the area east of Colchester (mainly affecting Tendring) – with the idea being that the most appropriate option to the west is combined with the most appropriate option to the east to result in the most appropriate spatial strategy for North Essex overall.

5.19 As required by the Inspector, the option of proportionate growth around existing settlements has been tested. It takes two forms in the assessment – a 'percentage-based' approach to growth which requires all towns and villages in North Essex area to accommodate the same percentage increase in dwelling stock in the period up to 2033; and a 'hierarchy-based' approach which directs more development towards larger towns

and less development towards smaller villages with limited services and facilities. Both approaches take into account the amount of housing development that is already proposed through existing planning permissions and housing allocations in respective Section 2 Local Plans – which already account for some 80% of expected growth. The percentage-based growth scenario involves a ‘thin spread’ of development around nearly every town and village in the western part of the North Essex area (Option West 1) and a stronger focus for major development around the coastal towns to the east, including Clacton, Harwich, Frinton, Walton, West Mersea and Wivenhoe (Option East 1). In contrast, the hierarchy-based growth scenario involves a greater focus on development on the edge of Braintree and at Hatfield Peverel and Halstead to the west (Option West 2); and significant growth around the coastal town of Brightlingsea to the east (Option East 2).

- 5.20 Options involving different numbers and different combinations of Garden Communities have been also tested in line with the Inspector’s advice. To the west of North Essex, the current strategy in the Section 1 Local Plan of Garden Communities west of Braintree and at the Colchester/Braintree border at Marks Tey (Option West 3) has been re-assessed as well as alternatives incorporating the Monks Wood alternative Garden Community proposal from Lightwood Strategic. These include Monks Wood being developed alongside and in addition to the existing Local Plan Garden Community proposals (Option West 4); and as a direct alternative to either of the two current proposals (Options West 5 and West 6).
- 5.21 Strategic developments in the form of major urban extensions to the east of Braintree (Option West 7) and on land at Halstead (Option West 8) have been tested alongside proportionate growth around other settlements; and the option of just having one single Garden Community alongside proportionate growth around existing settlements has also been tested in a different combinations involving the West of Braintree Garden Community alone (Option West 9); the Colchester/Braintree Borders Garden Community alone (Option West 10); and the Monks Wood alternative Garden Community alone (Options West 11).
- 5.22 For the eastern part of North Essex, the alternative options that have been tested are the current Tendring/Colchester borders Garden Community (Option East 3); a north-east urban extension to Colchester (Option East 4); ‘Tendring Central Garden Village’ – a proposal for major development on land around Frating, as promoted by Edward Gittins & Associates (Option East 5); and, in line with the Inspector’s advice, the ‘Metro Plan’ concept promoted as an alternative by the Campaign Against Urban Sprawl in Essex (CAUSE) which involves developing land around the railway stations at the villages of Alresford, Great Bentley, Weeley and Thorpe le Soken which are all along the Colchester to Clacton branch line.
- 5.23 Assessment findings (see Appendix 1)  
The Councils have now received from LUC the ‘Summary of Draft Findings’ with the full SA report to be completed in time for the meetings of the three authorities’ respective Committees.
- 5.24 The options for further proportionate growth around existing settlements to end of the plan period in 2033 performed relatively poorly against the various sustainability objectives compared to alternatives that involved more focussed strategic development in the form

of new settlements or major urban extensions – particularly in relation to travel patterns, modes of transport and the delivery of affordable housing. The proportionate growth scenarios have therefore been found to be less sustainable - which demonstrates, importantly, that the NEAs are justified in exploring more strategic alternatives that involve the establishment of new communities.

- 5.25 For those more strategic spatial strategy alternatives to the west of Colchester, the SA finds that performance against the various sustainability objectives is fairly similar and there is consequently 'little to choose' between the different options. Professional judgement is therefore required to distinguish between them, taking other factors into account.
- 5.26 For the spatial strategy alternatives to the east of Colchester, again the options perform similarly against the sustainability objectives although the proposal for a north-east extension to Colchester (Options East 4) is considered to be the weakest due to its potential negative impacts on the Bullock Wood SSSI and limited transport connections into Colchester. The Tendring/Colchester Borders Garden Community (Option East 3) and Tendring Central Garden Village (Option East 5) perform better than the CAUSE Metro Plan (Option East 6) in the longer term because they would provide for a scale of development sufficient to accommodate a health care facility; although Tendring Central is likely to be subject to significant adverse effects from noise pollution.
- 5.27 The Tendring/Colchester Borders Garden Community performs well in terms of potential economic growth. Metro Plan performs well in terms of its easy access to railway stations which could help to reduce carbon emissions, however the rural location of the Metro Plan developments could lead to longer journeys by car where rail is not a realistic choice. For shorter journeys, the Garden Community performs most strongly.
- 5.28 In many respects Tendring Central Garden Village performs as well as the Tendring/Colchester Garden Community, although no better; and whilst it has the advantage of an existing employment area and would retain its own distinctiveness being separated by some distance from Colchester, its location and distance from Colchester is likely to encourage a high proportion of journeys by car.
- 5.29 Officers' recommendation following the findings of the Additional SA work  
Whilst many of the alternative spatial strategy options perform similarly against the various sustainability objectives, the findings of the Additional SA work do not suggest in any way that there is a clearly stronger alternative to the current strategy for three Garden Communities set out in the submitted Section 1 Local Plan. On this basis, there are no reasons arising from the SA findings for Officers to change their recommendation in respect of the most appropriate strategy for growth in North Essex. It is considered that the Additional SA work will satisfy the Inspector that reasonable alternatives have been considered in an objective way and that the choice of spatial strategy for the Section 1 Plan is both justified and sound.

### **5.30 Additional Evidence Base**

As well as the work on the Additional Sustainability Appraisal, there are various other pieces of evidence aimed at addressing the Inspector's specific concerns. Below is a

summary of the evidence, setting out the Local Plan position, the issues raised by the Inspector and how the evidence addresses those issues.

### **5.31 Strategic transport infrastructure funding**

The Section 1 Local Plan (through Policy SP5) identifies 'strategic priorities for infrastructure provision and improvements' to support the major growth proposed for North Essex. These include improved road infrastructure and strategic highway connections to reduce congestion and provide more reliable journey times along the A12, A120 and A133 to improve access to markets and suppliers for businesses, widen employment opportunities and support growth.

- 5.32 For the Tendring/Colchester Borders Garden Community, Policy SP8 in the Section 1 Plan requires primary vehicular access to the site to be provided off the A120 and A133 and the Concept Framework prepared by David Lock Associates shows a potential link road between the A133 and the A120.
- 5.33 For the Colchester/Braintree Borders Garden Community, it is already proposed that the A12 will be widened – however the form that widening will take will have implications for the scale of development that the Garden Community can deliver. Policy SP9 in the Section 1 Plan envisages between 15,000 and 24,000 new homes. The Concept Framework prepared by David Lock Associates shows how realigning the A12 to follow a more southerly route could release more land to enable development to achieve the upper-end of that range and a pattern of development that can be centred around key facilities.
- 5.34 Both the Colchester/Braintree Garden Community and the West of Braintree Garden Community benefit from additional road capacity being created through the dualling of the A120 between Braintree and the A12 – the form of which would also have implications for the way in which the Colchester/Braintree Borders scheme is to be laid out.
- 5.35 In his June 2018 letter, the Inspector (paragraph 37) indicated that greater certainty over the funding and alignment of the A120 dualling scheme and the feasibility of realigning the widened A12 at Marks Tey would be necessary to demonstrate that the Garden Communities were deliverable in full. At the time of the Local Plan examination in 2018, no decisions had been taken in respect of either of these schemes.
- 5.36 In response to the Inspector's advice, the NEAs can now provide an update on the progress of two bids that have been made by Essex County Council to the government's Housing Infrastructure Fund (HIF). Essex County Council has submitted two bids under the 'Forward Funding' element of the HIF programme, which seeks to provide upfront early funding of strategic infrastructure to enable housing to come forward:
- **Colchester Braintree Borders Garden Community (£229m):** The bid seeks funding to support the realignment of the A12 between Kelvedon and Marks Tey to facilitate and realise the full growth potential of the Garden Community. Land is currently being promoted either side of the A12 and a comprehensive development is unlikely to be deliverable given the severance that would occur should the A12 remain in, or near to, its current location. The infrastructure provided by the proposed scheme would facilitate the delivery of 21,000 new homes at the CBBGC



site of which 15,000 are unlocked by this HIF investment. Without this funding, development at the site would be capped at around 6,000 homes. Without HIF funding this is likely to continue to be promoted as a single site but unlikely to achieve full Garden City principles, would still suffer from access issues, and may well remain stalled. The realigned route is proposed to reconnect with the existing A12 south and west of Marks Tey, and not east of Marks Tey as per the Colchester Braintree Borders Concept Framework (DLA, 2017, reference EB/026) illustrative alignment, which reduces capacity of the site to 21,000 units. The bid also includes a new junction 25 which will provide direct access to the proposed Garden Community, signalling junction 23 at Kelvedon where the A12 meets a new A120 to facilitate traffic flow and widening of the Kelvedon Bypass to four lanes in each direction to accommodate future traffic volumes.

- **Tendring Colchester Borders Garden Community (£99m):** The bid seeks funding for a new A120 – A133 Link Road and provision for a rapid transit system (RTS). Funding is sought to implement the RTS which will prioritise public transport on key routes into Colchester for new and existing residents. The system will service a new Park and Ride and help to better connect the planned Garden Community on the borders of Colchester and Tendring with the rest of the town. A new strategic link between the A120 and A133 will improve connectivity locally and within the wider region and relieve traffic going to the University of Essex and its Knowledge Gateway technology and research park.

5.37 The bids are currently being evaluated by Homes England. Engagement between ECC (with the NEAs) and Government officials has been very positive to date, and ECC has written to Government Ministers setting out the importance of announcements on the outcome of the HIF bids as quickly as possible. The bids require works and spend to be implemented by April 2024 and therefore Essex County Council is continuing to evolve more detailed proposals and work on delivery of the infrastructure components in advance of funding decisions, in order to provide a strong foundation for future delivery.

### 5.38 A12 widening and junction improvements

As per the position at the examination, this scheme is included in the funding round known as Road Investment Strategy (RIS) 1 with funding already secured. The A12 programme between J19-25 will be delivered by Highways England under the Project Control Framework (PCF). It is anticipated that Highways England will make a preferred route announcement on the A12 widening project in Summer 2020. The A12 works will require consent through Development Consent Order and the current programme expects this to be submitted in 2022, with start of physical construction in Spring 2023 with works anticipated to be complete by 2027/28.

5.39 Highways England have recently announced the appointment of their Delivery Integration Partner, Costain, who alongside Jacobs, will deliver the A12 Chelmsford to A120 Widening scheme from preliminary design and planning application submission, through to construction. Highways England, Essex County Council, Braintree District Council and Colchester Borough Council are continuing to work closely to understand the impact of the scheme on the proposed Colchester Braintree Borders Garden Community as well as existing residents at Marks Tey. The proposed development is likely to affect the alignment

of the A12 between junctions 24 and 25, and consequently it may be necessary to put forward new plans that reconsider the road alignment between junctions 24-25. In this case, Highways England will consult with those affected on any potential realignments.

#### **5.40 A120 Dualling**

At the time of the hearing sessions held in January and May 2018 and the Inspector's June 2018 letter, there had been no decisions in respect of the proposed alignment for the dualled A120 and the Inspector was concerned (paragraph 36) that the various options for realigning the A120 that were under consideration at the time could have quite different implications for the A120's relationship with the Colchester Braintree Borders Garden Community.

5.41 ECC announced its favoured route in June 2018, which was recommended to Highways England / Department for Transport for inclusion in RIS2. The favoured route runs from Galley's Corner at Braintree to a new junction with the A12 to the south of Kelvedon. If the A120 Braintree to A12 upgrade is included in RIS2, it is expected to be announced in 2019. If successful, this would likely be followed by a Preferred Route Announcement by Highways England. Provided that the scheme progresses as planned, and funding is made available, it is anticipated that construction could commence in 2023 with the road ready for use by 2027. ECC will continue to lobby the Government if the A120 is not included in RIS2 to include it for improvement at the earliest possible opportunity.

5.42 The A120 Essex project team and Highways England have established a joint Project Board to take strategic and collective decisions and to review progress of the scheme. The project has been reviewed at several points both by Highways England and through an Independent Assurance Review process. Highways England is satisfied that the project has undertaken its technical and consultation processes effectively, and in accordance with its requirements. The review team concluded that the project team is on track to identify a viable scheme for consideration for inclusion in RIS2. They gave the project a 'green' Delivery Confidence Assessment, the highest available.

#### **5.43 Rapid Transit System**

The Section 1 Local Plan (through Policy SP7) proposes a step change in integrated and sustainable transport systems for the North Essex area that put walking, cycling and rapid public transit networks and connections at the heart of growth in the area, encouraging and incentivising more sustainable active travel patterns. Key to achieving this, it is proposed that each Garden Community is served by a 'rapid transit system' (RTS) to enable fast public transport connections into Colchester, Braintree and Stanstead. A Movement and Access Study produced in support of the plan set a target of 30% of all journeys to, and from the Garden Communities, to be made by rapid transit.

5.44 In his June 2018 letter (paragraph 39), the Inspector raised concerns that such a target could only be achieved if RTS was available early on in the lifetime of the Garden Communities and that, at the time of the hearing sessions, the planning for RTS was at a very early stage and that there was insufficient evidence on which to determine the likely form of RTS, its capital cost (which would be key to the overall viability of Garden Communities) and the timescales for delivery.

5.45 In response to the Inspector's concerns, Essex Highways (the partnership between Essex County Council and consultants Jacobs) have produced a document entitled 'North Essex Rapid Transit System – from vision to plan' (summarised in Appendix 2) which explains how a high quality, fast, reliable and frequent public transport system can be created which, alongside other measures incorporated into the Garden Communities, will provide the best possible chance of achieving a successful outcome in terms of mode share. The document considers different modes of rapid transport and recommends that in the early stages (up to 2033) the focus should be on delivering segregation route infrastructure. This would enable the system to evolve beyond the end of the plan period so that it could accommodate the very latest in transport technology, potentially using trackless tram technology. The report also sets out four clearly identified route options for the RTS (see below) which enable rapid linkages between the Garden Communities, town centres, key employment areas (including London Stansted Airport) and other important attractors utilising a combination of newly created routes and existing roads.

5.46 The four route options for the RTS are:

- **Route 1** connecting Tendring/Colchester Borders Garden Community, a potential eastern park and ride site, the university, the main rail station, the hospital and the existing Colchester northern park and ride site.
- **Route 2** connecting Colchester/Braintree Borders Garden Community, a potential western park and ride site, the town centre and the rail station.
- **Route 3** being planning jointly with Uttlesford District Council and connecting Stansted with Braintree via the West of Braintree Garden Community.
- **Route 4** connecting Braintree and the Colchester Braintree Borders Garden Community, and in doing so connects the two subsystems that would have been created.

5.47 More detailed study work has already begun on Route 1 as part of the HIF bid for the A120/A133 link road. In terms of delivery, it is expected that Routes 1, 2 and 3 will be in place by the end of the plan period. Post-2033, the intention is to extend the level of segregation on Routes 1-3 and introduce Route 4, which connects the two subsystems. The timescales for this further investment will be timed according to funding availability. Whilst significant investment is planned as part of the garden communities, it is expected that additional bids will be made to government for funding (e.g. Housing Infrastructure Fund; Strategic Infrastructure Tariff).

The report explains how the proposed form of RTS is commercially viable and that it can be incrementally developed, in a phased manner from the outset, alongside the growth at Garden Communities. The report is bolstered by input from national public transport operators, including the Go Ahead Group.

#### 5.48 **Modal Shift**

In addition to the document produced on RTS, a paper entitled 'Mode Share Strategy for the North Essex Garden Communities' (see extract in Appendix 3) has been produced separately by consultants ITP which sets out a variety of measures that can be put in place to influence the way in which people travel, which, alongside RTS will enable the 30% target to be achieved. Such measures include achieving mixed-use developments which

integrate residential, leisure and employment land uses together; higher density development in certain locations; building close to the public transport network; the use of car parking restrictions on specific streets; giving priority to walking and cycling in the layout of development; and creation of car free areas in certain locations.

#### **5.49 Marks Tey Station**

Policy SP9 in the Section 1 Plan in respect of the Colchester/Braintree Borders Garden Community states that opportunities will be explored to establish how Marks Tey rail station can be made more accessible to residents of the new community including through the improvement of walking, cycling and public transport links to the station, or to relocate the station to a more central location. A Concept Framework for the Garden Community shows the relocation of the station some 2km to the south-west where it could form part of a transport interchange in the centre of the community. Neither the Section 1 Plan nor the Concept Framework say that the relocation of the station is essential to the success of the Garden Community.

- 5.50 In his letter, the Inspector stated (paragraph 44) that the current peripheral location of the station would integrate poorly with the structure of the proposed Garden Community and whilst he acknowledged (paragraph 45) that relocation was not essential, he nonetheless felt it would be a missed opportunity if a Garden Community on the scale currently proposed were to proceed with the station on its periphery. Furthermore, the Inspector noted (paragraph 47) that the viability appraisal in support of the Local Plan allocated a considerable cost of some £50million towards the relocation of the station albeit 30 years into the build programme which, in his view, would be too late to enable the station to be integrated into the planning of the new town centre.
- 5.51 Further joint working is being undertaken with Network Rail regarding the potential for a new rail station. Network Rail has undertaken a timetable evaluation to understand the potential implications of a new station on the Great Eastern Main Line (GEML). This analysis indicated that the provision of an additional new station would have a detrimental impact on journey times between Colchester and Chelmsford. Network Rail have advised that it would be more appropriate to consider providing improved connectivity to/from existing stations on the GEML as opposed to the provision of a new station. Additional work is ongoing to look into the capacity of the GEML to consider the impacts of the GC and wider growth on the line.
- 5.52 Update from discussions with Network Rail that suggest relocating Marks Tey Station to the centre of the proposed Garden Community for the Colchester/Braintree Borders Garden Community is unlikely to be practical option. Although the Garden Community was never reliant on the station being relocated, there is now clarity in moving forward that the development will need to be planned to integrate with the station's existing location.

#### **5.53 Housing Delivery (build out rates)**

All three of the proposed Garden Communities are expected to deliver new homes partly within the timescale of the Local Plan up to 2033 but mostly beyond 2033 and potentially over multiple plan-periods. Whilst they propose between 29,000 and 43,000 in total over their full period of construction, it was only expected that 7,500 new homes will be delivered

i.e. 2,500 in each of the three locations up to 2033. To achieve this level of development between now and 2033, each location would need to see rates of development increasing over time to between 250 and 350 homes a year.

5.54 In his letter, the Local Plan Inspector (paragraph 53) found that whilst not impossible that one of more of the Garden Communities could deliver at rates of around 300 homes a year, he felt (based on the evidence before him) that it would be more prudent to plan on the basis of an annual average 250 a year. If the NEAs were to adopt this approach, the total number of homes that Garden Communities could be expected to contribute towards housing supply in the period up to 2033 would reduce slightly from 7,500 to nearer 7,000 but more importantly the overall construction period for the Garden Communities would be extremely long, particularly for the larger Colchester/Braintree Borders Garden Community where the construction period would be somewhere between 60 and 96 years. The implications on viability of such a long construction period are considerable – particularly in relation to interest payments.

5.55 In response to the Inspector's comments, Officers from the three NEAs have conducted further research into the rates of housebuilding that are achievable and have produced a topic paper entitled 'Build out rates in the Garden Communities' (findings summarised in Appendix 4). The topic paper includes a review of the evidence that was before the Inspector at the examination hearings and a review of recent publications which explore how to boost housebuilding (including the Oliver Letwin Review) as well as evidence on high build-out rates that have either been achieved or are expected to be achieved on sites in other parts of the country.

5.56 The topic paper concludes that since the examination hearings the Inspector's advice to plan for an annual average of 250 completions a year at the Garden Communities is overly cautious and that, based on the evidence compiled, rates of more than 300 homes a year are achievable.

#### **5.57 Viability**

It is important that proposals in the Local Plan are economically viable to ensure they have a realistic prospect of being delivered within the timescales envisaged. The Garden Community proposals were supported by an assessment of viability undertaken by Hyas (North Essex Local Plans (Section 1) Viability Assessment: Main Report & Appendices, April 2017), which was subject to considerable debate at the Examination in Public.

5.58 In his letter following the Hearing sessions, the Inspector acknowledged the 'strategic' nature of the viability work in light of the early stage of proposals, the residual valuation methodology and key importance of making sound assumptions. The Inspector accepted that generally reasonable assumptions had been adopted with respect to a broad range of key inputs but highlighted a number of areas where he felt that the viability assessment required additional work and therefore had not sufficiently demonstrated that the proposed Garden Communities were financially viable.

5.59 The specific areas of concern were:

- Transport infrastructure costs – where the Inspector (paragraphs 66 & 68) found that the potential cost of a rapid transit system and/or any likely developer contributions towards the A12 and A120 improvements required further consideration and needed to be fully taken into account as part of the viability assessment work.
- Land purchase and interest – where the Inspector (paragraph 71) found that no allowance had been included in the viability appraisal for the cost of interest on any borrowing to fund the purchase of land by a master developer – which, given the likely scale and during of the Garden Communities, could be substantial.
- Contingencies and sensitivity testing – where the Inspector (paragraph 77) found that the ‘contingency’ allowance being applied to certain capital sums for specific elements of infrastructure was potentially too low.
- Price of Land – where the Inspector (paragraphs 82-85) found that landowners would require sufficient land values to persuade them to bring land forward for development and that the viability assessment would need to demonstrate that such reasonable uplifts over and above current use values could be achieved.
- Other specific aspects including the cost and timing of a potential new rail station at Marks Tey (paragraph 47), the build out rate being achievable (paragraph 53), the provision of employment land consistent with the wider approach, and ability to deliver the required level of affordable housing.

5.60 In response to these issues, Hyas have produced an updated viability assessment (summarised in Appendix 5) which takes into account the latest information on the costs of all strategic infrastructure (including the RTS and elements included in the HIF bids), includes an allowance for interest costs on land purchase, applies higher contingency rates and addresses all other matters raised by the Inspector. The update also considers updates to national planning policy and guidance relating to viability since the previous Examination in Public which provide further clarity to the consideration of viability going forward. A detailed cost estimate produced by Gleeds (extract in Appendix 8) has set out the overall scope, scale and estimated costs of all strategic infrastructure requirements for each proposed Garden Community.

5.61 The updated assessment finds that all three of the Garden Community proposals can be considered viable in that they are capable of producing Residual Land Values that will create significant uplift for landowners well in excess of existing/current values. This is alongside generating sufficient profit for developers and investors to meet their requirements, including supplementary considerations of the time/value of money through a discounted cash flow analysis.

5.62 The assessment for West of Braintree Garden Community projects positive uplifts in land value (to circa £80,000-£140,000 per gross acre) without any grant assistance and with no allowance for inflation. This is considerably in excess of current use values with greenfield

agricultural land worth in the order of £10,000 per acre with positive inflation (which would be expected over time), the uplifts in land value could be considerable meaning that this Garden Community is comfortably viable across a range of scenarios.

- 5.63 The Tendring/Colchester Borders Garden Community is located in an area where house prices are generally lower than those achievable to the West of Braintree and therefore the projected uplift in land value are also generally lower. That said, even without grant assistance and no allowance for positive inflation, the development could still achieve a positive, albeit lower uplift (between £15,000-£70,000 per gross acre) beyond similar agricultural land values (circa £10,000 per acre). The site is more marginal in viability terms at the highest consideration of contingencies. However, the achievement of Government grant funding for upfront strategic infrastructure (such as via the currently shortlisted HIF bid, or any subsequent funding opportunity) would increase uplifts to higher levels (upwards to around £200,000 per gross acre). With positive inflation, the scheme could deliver a much higher uplift (upwards of £300,000 per hectare).
- 5.64 The Colchester/Braintree Garden Community comes with significantly higher upfront infrastructure costs than the other two schemes (primarily due to the need to invest in works to the A12) and, as a result, without grant or positive inflation, the development would not achieve an uplift beyond current land values and would not be considered viable. That said, the site benefits from a short-listed infrastructure funding bid and it is therefore not unreasonable to anticipate the proposals to be considered favourably for potential grant funding, either through the current HIF process, or through any future infrastructure funding opportunities that may be implemented to support strategic housing growth. In addition inflation based scenarios produce considerably higher residual land values. With grant but no positive inflation, the development could achieve a positive land value uplift (£60,000 to £100,000 per gross acre) and with inflation the uplift would be considerably higher.
- 5.65 The assessments therefore reveal that for both Tendring Colchester Borders and Colchester Braintree Borders there is a degree of reliance on securing either Grant funding, and/or inflationary impacts to demonstrate viability. The consultants consider that such scenarios are both credible and realistic given the long history of Government support in infrastructure to support housing growth, and trends in inflation over recent decades (including through periods of economic change and uncertainty, albeit recognising that forecasting over such a long timescale will be subject to considerable uncertainty).
- 5.66 The updated viability work is clear in that it can only provide a strategic overview of viability and a point in time consideration that will need to be monitored and reviewed over time. There will be a broad range of factors which could depress or enhance viability going forward and are set out in the viability update report. Some aspects such as unforeseen costs or wider economic conditions are considered as factors that may depress viability, but a wide range of other factors are identified that could enhance viability over time such as enhanced value created through placemaking, construction cost efficiencies such as through wider uptake of modular construction, inflation rates being higher than forecast, speedier delivery and ability to secure future Government investment support. The updated viability assessment has taken a relatively prudent approach to many

assumptions thus providing further confidence that the viability position could improve over time.

- 5.67 As a further consideration, the approach to the Garden Communities is based upon the preparation subsequent site specific Development Plan Documents and ultimately through the development management process. As such viability will need to be subject to ongoing monitoring and review as part of a future and ongoing processes to track costs, values and potential returns.
- 5.68 The overall findings of the updated viability assessment suggest that there is no reason to abandon any of the three Garden Community proposals at this stage in the process over insurmountable concerns about economic viability, as there are realistic and credible scenarios which can deliver viable schemes.

## **5.69 Employment Land**

- 5.70 Section 1 (through Policy SP6) aims to deliver sufficient employment within the Garden Communities to accommodate the 'one job per household' ambition set out in the NEGC Charter. The submitted Section 1 does not specify how much land should be allocated for employment uses, instead opting for an approach that would allow for the amount of employment land within each Garden Community to be defined through the Strategic Growth Development Plan Documents (DPDs).
- 5.71 In his interim findings the Inspector took issue with this approach and whilst he accepted the difficulties involved in forecasting employment requirements so far into the future, he nonetheless considered it appropriate for Section 1 to provide an indicative employment land requirement. He therefore recommended that the NEAs modify Section 1 to include employment land figures for each Garden Community; doing so would provide direction to the preparation of the DPDs in a similar way to how the housing ranges will be used to inform residential land requirements in the DPDs.
- 5.72 To address this issue, the NEAs appointed Cebr (Centre for Business and Economic Research) to prepare an evidence base document (Appendix 6) which defines the amount of employment land required at each Garden Community. In doing so Cebr have analysed the existing sectors within the North Essex economy and forecasted the growth of these sectors using a variety of assumptions including past trends and the ability to intervene to attract particular sectors to the area. From this analysis Cebr were able to apply industry standard employee to floorspace ratios (different sectors have different ratios) which provided a volume of employment floorspace for each sector. This floorspace information was then converted into gross employment land.
- 5.73 Using Cebr's work, the NEAs are therefore now in a position to modify Section 1 to include employment land requirements for three Garden Communities as follows:
- Tendring Colchester Borders – 6.9ha within the plan period (part of a total of 24.5ha)
  - Colchester Braintree Borders – 4.0ha within the plan period (part of a total of 70.1ha)
  - West of Braintree – 9.1ha within the plan period (part of a total of 43.4ha)



These employment land requirements are suggested for inclusion in the proposed modifications.

#### **5.74 Phasing and delivery**

Section 1 of the Local Plans sets out an ambitious plan to uphold high standards of placemaking and design, whilst also ensuring timely delivery of transport, community, health, education and green and infrastructure. For example, Policy SP7 (at point iv) states that infrastructure will be delivered ahead of, or in tandem with, residential development to support new residents and establish sustainable travel patterns.

- 5.75 In his interim findings, the Inspector concluded that whilst he supported the NEAs ambition to deliver infrastructure in such a way he was not convinced that he had seen sufficient evidence to demonstrate the deliverability of such an approach. For example at paragraph 134 he remarks:

*‘...The NEAs have, quite rightly, set high aspirations for the quality of their GC proposals and for the provision of affordable housing, open space, and social and community facilities in them. Clarity is needed at the outset over the affordability and deliverability of those aspirations, to ensure that they are not compromised during the development process because of unclear or conflicting expectations.’*

- 5.76 In response to the Inspector’s findings the NEAs considered it necessary to provide evidence on the deliverability of the ambition set out in Policy SP7 as well as the site specific Garden Community policies (SP8, SP9 and SP10). The NEAs therefore appointed AECOM to prepare an Infrastructure Planning, Phasing and Delivery report (extract for Tendring/Colchester Borders in Appendix 7 and Colchester/Braintree Borders in 7a), the purpose of which is to demonstrate the phased manner in which infrastructure will be delivered alongside new homes at the Garden Communities. The report looks in detail at the requirements of Section 1 to ensure that the phasing approach is compliant with policy requirements and more generally fulfils the NEAs’ ambition of infrastructure-led communities. Importantly the NEAs have ensured that this report is fully consistent with the viability evidence, demonstrating both the deliverability and the financial viability of the approach put forward in Section 1.

#### **5.77 Habitats Regulation Assessment (HRA)**

The ‘Habitats Regulations’ relate to the protection of wildlife sites of European importance including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) which include the Colne Estuary, Hamford Water and the Stour Estuary. ‘Habitats Regulation Assessment’ (HRA) is required to determine whether or not a proposal, policy or plan for development would adversely affect the integrity of a European site – either alone, or in combination with other plans and projects. The HRA has to be undertaken by the ‘competent authority’ who, for the Section 1 Local Plan, are the NEAs (i.e. Braintree, Colchester and Tendring Councils).

- 5.78 HRA was undertaken for the Section 1 Local Plan but in April 2018 (after the Local Plan had been submitted, but before the Inspector issued his letter) there was a landmark legal ruling from the Court of Justice for the European Union (CJEU) called the ‘People over Wind, Peter Sweetman v Coillte Teoranta’ judgement. That judgement had implications for

how HRA should be carried out and at which stage of the process mitigation measures (intended to avoid or reduce and harmful effects) should be carried out. In his letter, the Inspector advised that the NEAs would need to consider the implications of this legal judgement and would need to ensure that the HRA is compatible with this landmark judgement. In response, 'Land Use Consultants' (LUC) were commissioned by the NEAs to update the HRA for the Section 1 Local Plan, in consultation with statutory agencies including National England, in light of the legal judgement and this was completed in June 2019.

- 5.79 The 'HRA Report for North Essex Authorities Shared Strategic Section 1 Local Plan' (conclusions attached as Appendix 9) identifies the likely significant effects on European sites as being loss of offsite habitat, recreational impacts and water quality impacts. The assessment concludes that mitigation measures can be secured as part of the relevant developments to address loss of offsite habitat; that recreation impacts can be mitigated through the measures in the Essex Recreation disturbance Mitigation Strategy (RAMS) put in place by Essex authorities; and that the development should not result in adverse impacts to water quality so long as there is a commitment to address water treatment capacity issues prior to specific developments. Modifications to the policies in the Section 1 Local Plan are suggested to ensure that the plan properly reflects the findings of the updated HRA and that necessary mitigation is put in place. This report, alongside the suggested modifications, should demonstrate to the Inspector that the NEAs have complied with the Habitats Regulations in assessing the impacts of the Local Plan.

## **5.80 Delivery Mechanisms**

The Section 1 Local Plan explains that the NEAs are committed to ensuring that the new garden communities are as sustainable and high quality as possible and that the infrastructure needed to support them is delivered at the right time. This will require the Councils to work very closely with the relevant landowners using a robust delivery mechanism that ensures a fair and equitable distribution of the costs and land requirements needed to secure the ambitions for the Garden Communities and create a long term legacy appropriate to the scale of the ambition. Given the scale of complexity of the proposed Garden Communities, it is envisaged that 'Local Delivery Vehicles' (LDVs), with both private and public sector representation, will be used to oversee these developments.

- 5.81 Whilst, in his letter, the Inspector acknowledged that this approach was generally compatible with national planning policy and deploying new models of delivery was a legitimate aspiration, he questioned if other delivery mechanisms could be adopted – suggesting that there was no substantial evidence to show that only new models of delivery were capable of delivering Garden Communities in the way envisaged.
- 5.82 In response to this, the Councils' legal advisors Dentons have produced a specific paper entitled 'Delivery of the Garden Communities' (Appendix 10) which explains that since the submission of the Local Plan in 2017, the government has placed greater emphasis on local authorities taking a more pro-active role in the delivery of new homes and the delivery of Garden Communities. It also explains that new statutory provisions have been put in place promoting 'Locally Led New Town Development Corporations' (LLNTDCs) as a mechanism by which new development can be delivered. It is proposed that modifications

to the Local Plan are made to reflect the potential for Garden Communities to be delivered via LLNTDCs but that it will ultimately be for the Councils to decide whether this is the most appropriate means by which to proceed.

5.83 The paper also explains that if LLNTDCs are not used as a vehicle to deliver the Garden Communities and landowners and developers are left to bring the development forward on their own, they will be expected to meet all costs associated with their delivery in accordance with both the policies in the Local Plan and any more detailed requirements set to be included in the new Development Plan Documents (DPDs) for each of the schemes. It also explains that if landowners were unwilling to release their land at a reasonable price which allows for these costs to be met, the NEAs would be willing to use 'Compulsory Purchase Order' (CPO) powers to acquire the land – something that is supported by national planning policy, where necessary.

5.84 Dentons' paper will help to explain to the Inspector that whilst a Local Delivery Vehicle or a LLNTDC is the preferred means by which to deliver the Garden Communities, other delivery mechanisms are available and could be employed to ensure that the developments come forward in the way envisaged. When the detailed delivery mechanisms for the Garden Communities are discussed and decided, State Aid issues will be addressed (see Appendix 11).

#### **5.85 Proposed modifications**

If, through the examination process, an Inspector identifies certain issues with the soundness of a Local Plan that can be easily resolved, they can recommend 'modifications' to the plan. Under normal circumstances, modifications are published for consultation following the completion of the examination and responses are considered by the Inspector before they confirm that the plan is sound and can be formally adopted.

5.86 For the Section 1 Plan for North Essex, a number of areas have already been identified which would benefit from amendments which have arisen from a number of sources, including representations received in response to the publication of the plan in 2017; statements of common ground entered into with statutory consultees in the run up to the examination hearings; responses to the Inspector's initial Matters Issues and Questions (MIQs) before the examination hearings; the discussions at the examination hearings themselves; and the Inspector's post-examination letters.

5.87 Officers have compiled a schedule of proposed amendments and the Inspector has agreed that these should be published for consultation alongside the Additional Sustainability Appraisal work and other evidence before the examination is resumed. The majority of the proposed amendments are minor changes to the wording of policies and supporting text but others could be considered to represent more fundamental changes to policies and how they are interpreted.

5.88 Whilst Members are being asked to endorse the proposed amendments for public consultation, it will be the Inspector who will ultimately decide which, if any, of the amendments should be main modifications to the final version of the plan before it is adopted. Any final modifications recommended by the Inspector will require further consultation following the completion of the examination, but the consultation proposed for

the current schedule of modifications will enable objections to be considered, by the Inspector, when he resumes the examination in due course.

5.89 The full schedule of proposed amendments is provided at Appendix 12. None of these amendments represent fundamental changes to the overarching strategy in the plan. The most significant of the proposed amendments are highlighted below:

- New Policy SP1A ‘Delivering Sustainable Development through the planning system’

An additional policy is suggested for inclusion in the Section 1 Local Plan, on the advice of the Inspector, to clarify how the policies in the Local Plan, taken as a whole, will operate in practice in the determination of planning applications. The proposed policy would state:

*“Development that demonstrably contributes to the achievement of the policies in this Local Plan (and, where relevant, of policies in neighbourhood plans) will normally be permitted unless material considerations indicate otherwise.*

*Development that is not in accordance with, or which will prejudice the delivery of, the strategic scale development or the achievement of the place making principles, in this Local Plan will not normally be permitted.”*

- New Policy SP1B ‘Recreational disturbance Avoidance and Mitigation Strategy (RAMS)’

An additional policy is suggested for inclusion in the Section 1 Local Plan, as agreed with Natural England, to reflect the new Essex-wide approach to mitigating against the impacts on internationally important wildlife sites arising from an increase in development and the associated risk of increased recreational disturbance at those sites. The proposed wording would state:

*“An Essex Coast Recreational disturbance Avoidance and Mitigation Strategy will be completed in compliance with the Habitats Directive and Habitat Regulations. Contributions will be secured towards mitigation measures identified in the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMs) which will be completed by the time the Local Plan is adopted.*

*Prior to RAMS completion, the NEAs will seek contributions from proposed residential development to deliver all measures identified (including strategic measures) through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive.”*

- Policy SP3: ‘Meeting Housing Needs’

Modifications to Policy SP3 are suggested to provide some explanation, on the Inspector’s advice, as to how the housing figures in the policy will be used for assessing each authority’s five-year housing supply requirements. The additional wording proposed would state:

*“The annual housing requirement figures set out below will be used as the basis for assessing each authority’s five-year housing land supply subject to any adjustments in Section 2 of each plan to address any undersupply since 2013. The North Essex authorities will review their housing requirement regularly in accordance with national policy requirements, and in doing so will have regard to the housing needs of the wider area.”*

- Policy SP4: ‘Providing for Employment’

Adjustments to the employment land requirements for the three authorities have been recommended by the Inspector to reflect the outcome of discussions at the examination hearings. In particular, they will rectify errors found within the figures for Braintree and Tendring. The revised employment land figures will be as follows:

	Baseline (ha)	Higher Growth Scenario (ha)
Braintree	20.9	43.3
Colchester	22.0	30
Tendring	12.0	20.0
North Essex	54.9	93.3

- Policy SP5: ‘Infrastructure and Connectivity’

Modifications to the infrastructure and connectivity policy are suggested to provide greater clarity over what would happen if, for whatever reason, it becomes clear that the infrastructure required for the Garden Communities will not be funded or delivered. The modifications also provide greater clarity over what key infrastructure projects will need to be secured in advance of the start of the Garden Communities. The main relevant wording would be as follows:

*“If the necessary strategic infrastructure for the Garden Communities as required by Policy SP5 is not committed within a reasonable period of time and phased alongside the delivery of new communities a review of the Plan will be undertaken prior to any consent being implemented, in order that the consequential shortfall in housing delivery does not overburden the infrastructure of existing communities/settlements.”*

*“Infrastructure provision will be secured in a timely manner and programmed to keep pace with growth of new communities.*

*Funding and route commitments for the following strategic transport infrastructure projects will need to be secured in advance of the start of the Garden Communities as follows:*

- Colchester/ Braintree Borders –
- A12 widening and junction improvements
- A dualled A120 from Braintree to the A12
- Tendring /Colchester Borders –
- A120-A133 Link road
- A scheme and specification for a phased rapid transit network and programme for the integration of the three Garden Communities into the rapid transit network
- Provision of appropriate sustainable travel options will be required to encourage and facilitate sustainable travel behaviour from the outset and to provide viable alternatives to single-occupancy private car use, and will be informed by masterplanning.

*Requirements for other strategic Garden Community infrastructure are outlined in sections D, E and F of Policies SP8, 9, and 10 and will be further set out in the Development Plan Documents for each Garden Community.”*

- Policy SP7: ‘Development and Delivery of New Garden Communities in North Essex’

A number of modifications are suggested for the wording of this policy, the most significant of which is to address the Inspector’s request that the Section 1 Local Plan specifies the employment land requirements for the Garden Communities. The relevant wording would be as follows:

*“In accordance with the Garden Community Charter principle of providing one job per household within the new community or within a short distance by public transport, provide and promote opportunities for employment within each new community and within sustainable commuting distance of it. Around 850,000 square metres of floorspace will be provided in total, with allocations to be defined within Development Plan Documents for each Garden Community totalling some 138 hectares.”*

- Policies SP8, SP9 and SP10: Specific policies for each of the three Garden Communities

It is suggested that each of the policies that correspond with the specific Garden Community proposals are modified to include wording agreed with Natural England in relation to the impact of waste water on internationally important wildlife sites. The wording would be:

*“To ensure new development does not have an adverse effect on any European Protected sites, the required waste water treatment capacity must be available including any associated sewer connections in advance of planning consent.”*

Additional wording is also proposed to address issues raised by Historic England at the examination in respect of the potential impact of the Garden Communities on the historic environment, as follows:

*“A Heritage Impact Assessment for each DPD in accordance with Historic England guidance will be required in order to assess impact of proposed allocations upon the historic environment, to inform the appropriate extent, nature and form of the development and establish any mitigation measures necessary.”*

- 5.90 Each Garden Community policy will also include a section to set out the amount of employment space to be created as part that development – based on the evidence contained within the report from Cebr. For the Tendring/Colchester Borders Garden Community (SP8) the figure will be 24.5 square metres; for the Colchester/Braintree Borders Garden Community (SP9) it will be 70.1 square metres; and for the West Braintree Garden Community (SP10) it will be 43.4 square metres.

5.91 Further bespoke modifications to each of the Garden Community policies are also proposed to reflect specific infrastructure or environmental requirements, for example additional wording around the proposed A120/A133 link road, the realignment of the A12 and the dualling of the A120 and the need to protect relevant internationally and nationally important wildlife designations.

## **5.92 Overall Conclusions**

Officers consider that the findings of the further Sustainability work and the additional pieces of evidence outlined above provide responses to all of the issues raised by the Inspector in his 2018 letters and demonstrate that the spatial strategy for growth set out in the submitted Section 1 Local Plan, including the three Garden Communities, meets the tests of soundness set out in the National Planning Policy Framework (NPPF).

5.93 The further SA work provides an objective assessment that addresses the Inspector's concerns about the previous assessment and follows a robust and transparent methodology developed through positive engagement with objectors to the plan and promoters of alternative development proposals. The findings of the SA work demonstrate that none of the reasonable alternative spatial strategy options perform notably better than the current strategy in the Section 1 Plan and provides no reason for Officers to conclude that the strategy should change. Given that the findings of the additional SA work suggest that many of the options perform similarly against the sustainability objections, planning judgement based on wider factors has to be exercised in determining the most appropriate strategy for growth in North Essex.

5.94 The alternative of further proportionate growth around existing settlements up to 2033 has been assessed as part of the additional SA work to help determine whether or not the NEAs are justified in taking a more strategic cross-border approach involving the establishment of new communities. However, the Local Plan process has already considered options relating to growing the main urban areas across North Essex and the majority of housing allocations in the three authorities' Section 2 Local Plans comprise such sites. The NEAs consider that reasonable opportunities to accommodate growth around existing settlements have been exhausted for the purposes of the plan period to 2033. It should be noted that the NEAs have also had a strong record in making use of existing previously developed 'brownfield' sites within settlements where possible.

5.95 Adding more development to existing towns and villages to make up the residual housing requirement to 2033 raises some genuine concerns about the efficient provision of infrastructure with existing and future residents having to cope with unnecessary pressure and demand on existing services and facilities that are not able to be efficiently expanded to cater for growth. Applying a 'percentage-based' approach to achieving further proportionate growth around existing settlements, including rural settlements would result in a thin distribution of development around numerous settlements, particularly to the west of Colchester and from a transportation perspective, such a thin distribution of growth is likely to lead to further dependence on the private car. The percentage-based approach would also push more development to coastal towns such as Clacton, Harwich, Frinton/Walton, Brightlingsea, Wivenhoe and West Mersea and this raises serious concerns about environmental impacts on internationally important wildlife areas, impacts

on existing transport infrastructure and the ability for the market to realistically deliver the number of homes required given the weaker housing market conditions to the east.

- 5.96 A 'hierarchy-based' approach to proportionate growth which directs additional housing to larger settlements would, in contrast, place a large proportion of North Essex's development to land on the edge of Braintree (a town that is already earmarked for significant growth in the plan period to 2033 in the Braintree Section 2 Plan); and, to a lesser extent, Halstead and Hatfield Peverel. In the face of highly challenging housing requirements going into the future and the constraints and challenges associated with continuing to expand existing settlements, the NEAs are justified in working together to establish new communities in line with Garden Community principles that provide scope for long-term managed growth in strategically important locations extending beyond the timeframes of the current plan that achieve a scale of development that will incorporate and deliver new infrastructure and thus reduce the pressure for expansion of existing communities.
- 5.97 To the west of Colchester, whilst many of the alternative strategies for strategic growth perform similarly against the sustainability objectives in the additional SA work, the proposals for Garden Communities to the West of Braintree and crossing the Colchester/Braintree Border carry genuine advantages. The proposal West of Braintree provides a strategic long term opportunity to deliver growth within the current plan period and beyond and to address needs in the western part of North Essex with direct access to the A120. It is well located to Stansted Airport both as a centre of local employment but also providing opportunities for new business growth. It also provides access to the M11 and the London Stanstead Cambridge Corridor. It is well located to the urban area of Braintree thus enabling it to benefit from the services and facilities provided in that higher order settlement, with a rapid transport system integral to realising that benefit.
- 5.98 The Colchester/Braintree Borders Garden Community also provides the potential for long term growth on a site with close proximity to the mainline railway station at Marks Tey and regular train links to London, Colchester and beyond within walking, cycling or bus rapid transport system to the station. It is well located at the intersection of the A12 and A120 thus providing opportunities for good accessibility and attractiveness to prospective residents and employers alike. There are also more opportunities for sustainable travel links into Colchester, a regionally important centre of employment offering a full range of facilities including a hospital and a major shopping and cultural destination.
- 5.99 Lightwood Strategic's proposal for an alternative Garden Community at Monks Wood (Pattiswick) is located within 3km of the proposed Colchester/Braintree Borders Garden Community with Coggeshall located between the two. It performs similarly against the sustainability objectives in the additional SA work but given the scale and proximity of these two proposals, it is not considered appropriate to include Monks Wood in the plan as well as the current Colchester/Braintree Garden Community given the impact on infrastructure, landscape and the existing resident population that these two large developments would have. Monks Wood is accessible to a much smaller, albeit very successful, cluster around Earls Colne Airfield and Coggeshall and is closer to Braintree than the Colchester/Braintree Borders Garden Community. However, the employment market in Braintree is not as strong as Colchester's and major new employment areas are



proposed on the west side of Braintree which is in closer proximity to the proposed West of Braintree Garden Community. A Garden Community at Monks Wood would be located on the highly trafficked single carriageway of the A120 and whilst it is proposed that the A120 is dualled and realigned further south (between Kelvedon and Braintree), the only other roads in the vicinity are rural lanes with very limited opportunity to access a site of this size by other routes. The impact on the historic character of the dispersed settlement of Pattiswick is also considered to be greater than on the character of Marks Tey which is much more of a modern settlement.

5.100 To the east of Colchester, the Tendring/Colchester borders Garden Community offers multiple benefits to both Colchester and Tendring in terms of housing delivery, the A133/120 link road and the opportunities to relieve traffic and unlock the economic potential for more expansion of the University of Essex and the Knowledge Gateway whilst relieving pressure caused by continued growth on the edge of existing towns and villages. CAUSE's Metro Plan concept does not offer such mutually beneficial outcomes, raises concerns about encouraging car-borne journeys where rail is not a viable alternative, and would significantly and unnecessarily alter the character of a number of rural communities in Tendring. The Tendring Central Garden Village concept scores similarly to the Tendring/Colchester Borders Garden Community in the additional SA work, but critically does not offer the mutual cross-border benefits to Colchester and Tendring that arise from the link road and potential for growth at the University of Essex and the Knowledge Gateway – it would be an unnecessary standalone development further east into Tendring that would encourage longer car journeys.

5.101 Officers therefore consider that the current strategy in the Section 1 Local Plan which proposed three Garden Communities in the locations currently suggested remains the most appropriate strategy for North Essex. The other additional evidence, including studies on rapid transit, housing delivery and viability respond directly to the issues raised by the Inspector and demonstrate that the three proposed Garden Communities are viable and deliverable.

### **5.102 Next Steps**

The relevant Committees of the three Councils are all considering the additional evidence that has been prepared, the findings of the additional Sustainability Appraisal work, and proposed amendments. Braintree and Tendring District Councils will need to make recommendations to Full Councils following their respective Local Plan Committees. If all three authorities agree, the additional evidence base, Additional Sustainability Appraisal work and the proposed amendments will be published for six-weeks consultation to allow third parties the opportunity to consider both the modifications and the evidence and make any comments. The six-week consultation period is expected to run from 19 August 2019 to 30 September 2019.

5.103 The Officers of the three authorities will collect any representations made and, following the six-week consultation period, will submit the schedule of modifications, further SA work and all the other additional evidence to the Secretary of State, along with all the comments received from third parties. The Inspector will then consider all of this information and will liaise with the NEAs to confirm the timetable for resuming the examination and undertaking

further examination hearings. The Inspector may issue a further series of Matters, Issues and Questions (MIQs) to establish the main topics he wishes to examine and to invite written responses from participants in the examination ahead of the hearings. It is currently anticipated that hearings will take place either at the end of 2019 or in early 2020.

5.104 Following the completion of the further examination hearings, the Inspector will write to the NEAs to confirm whether or not his concerns about the Garden Communities have been addressed and whether or not the Section 1 Local Plan now meets the tests of soundness. The Inspector will have the ability to recommend additional post-examination modifications to the plan which would need to be the subject of further consultation in their own right before the plan can be finalised and formally adopted by the NEAs.

5.105 The examination of the authorities' individual Section 2 Local Plans will not take place until Section 1 has been examined and found to be sound.

## **6. Equality, Diversity and Human Rights implications**

6.1 An Equality Impact Assessment has been prepared for the Local Plan, and is available to view by clicking on this link: -  
<http://www.colchester.gov.uk/article/12745/Policy-and-Corporate>

## **7. Strategic Plan References**

7.1 The Strategic Plan is relevant in particular in contributing towards priorities under all the themes of Growth, Responsibility, Opportunity and Wellbeing:

- Growth - Develop jobs, homes, infrastructure and communities to meet the borough's future needs by creating new Garden Communities
- Responsibility - Promote responsible citizenship by encouraging residents to get involved in their communities and to identify solutions to local issues; and create new routes for walking or cycling and work with partners to make the borough more pedestrian-friendly.
- Opportunity - Ensure a good supply of land available for new homes through our Local Plan.
- Wellbeing- Encourage belonging, involvement and responsibility in all the borough's communities; and help residents adopt healthier lifestyles by enabling the provision of excellent leisure facilities and beautiful green spaces, countryside and beaches.

## **8. Consultation**

8.1 As outlined in the May 2019 update to the Planning Inspector, the NEAs will undertake consultation on the revised evidence base, additional sustainability appraisal, and proposed modifications to Section 1 from Mid-August to the end of September, subject to decisions made at the respective committees.

8.2 The purpose of the consultation will be to gather views on the additional evidence base documents that have been commissioned to address the issues raised in the Inspector's interim findings on Section 1 in June last year. By doing so the NEAs hope that any issues with the evidence base will be raised at the earliest opportunity to help inform the Examination.

- 8.3 The questions posed to consultees will be intentionally general in nature as the proper place for specific questions on the revised evidence base will be through any additional matters, issues and questions the Inspector may publish prior to reconvened hearing sessions. However, it will be important for the consultation and the responses to the consultation to avoid revisiting matters which the Inspector has not raised as of concern to the Examination of Section 1.
- 8.4 The consultation will be jointly hosted on the NEAs' web-based portal and measures will be put in place to avoid duplicate responses being made to individual authorities. Due to the technical nature of the consultation the NEAs do not intend to carry out any drop-in sessions, however previous consultees to Section 1 consultations will be informed of the consultation.
- 8.5 Following the consultation the NEAs will process all comments received and submit them (alongside the documents subject to the consultation) to the Programme Officer in a similar fashion to which followed the Regulation 19 Submission consultation in October 2017. They will be forwarded to the Inspector and used to inform further hearing sessions.

## **9. Publicity Considerations**

- 9.1 The report, evidence base and consultation is expected to generate significant publicity. The Council will approach this in a transparent manner and proactively seek to get accurate information into the public domain. Steps have been taken to improve the section of the Councils website which deals with Garden Communities.

## **10. Financial implications**

- 10.1 The additional evidence base has been funded through an approved budget.

## **11. Health, Wellbeing and Community Safety Implications**

- 11.1 The Garden Communities are intended to promote health, wellbeing and community safety by improving housing choice and employment opportunities, access to green open space and community facilities, as well as other infrastructure.

## **12. Health and Safety Implications**

- 12.1 N/A

## **13. Risk Management Implications**

- 13.1 Adoption of the Local Plan will reduce the risk of inappropriate development.

## Appendices

1. 'Additional Sustainability Appraisal of North Essex Local Plan Section 1: Summary of Draft Findings.'
2. Executive summary of 'North Essex Rapid Transit System for North Essex: From vision to plan'.
3. Conclusion and next steps from 'Mode Share Strategy for the North Essex Garden Communities'.
4. Summary of findings and conclusion from 'Build Out Rates in the Garden Communities'.
5. Executive summary of 'North Essex Local Plans (Section 1) Viability Assessment Update – Main Report'.
6. Employment Provision for the North Essex Garden Communities.
7. Tendring/Colchester Borders extract from 'North Essex Garden Communities Infrastructure Planning, Phasing and Delivery.'
- 7a. Colchester/Braintree Borders extract from 'North Essex Garden Communities Infrastructure Planning, Phasing and Delivery.'
8. Summary of 'North Essex Authorities Infrastructure Order of Cost Estimate (41,000 homes)'.
9. Conclusions of 'HRA Report for North Essex Authorities Shared Strategic Section 1 Local Plan.
10. 'North Essex Authorities' Position Statement on Delivery Mechanisms'.
11. 'North Essex Authorities' Position Statement on State Aid.
12. Schedule of proposed amendments.

## Background Papers

There are numerous background papers all of which are available on the Examination website hosted by Braintree DC;

[https://www.braintree.gov.uk/info/200643/section\\_1/1065/section\\_1\\_examination\\_publication\\_local\\_plan\\_braintree\\_district\\_colchester\\_borough\\_and\\_tendring\\_district\\_council](https://www.braintree.gov.uk/info/200643/section_1/1065/section_1_examination_publication_local_plan_braintree_district_colchester_borough_and_tendring_district_council)



# **Additional Sustainability Appraisal of North Essex Local Plan Section 1: Summary of Draft Findings**

Prepared by LUC  
July 2019

**Project Title:** North Essex Local Plan Section 1 Additional Sustainability Appraisal

**Client:** North Essex Authorities

Version	Date	Version Details	Prepared by	Checked by	Approved by
2.0	1 July 2019	Submitted to client	Jeremy Owen Stuart Langer Jon Pearson	Jon Pearson Jeremy Owen	Jeremy Owen



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## **Additional Sustainability Appraisal of North Essex Local Plan Section 1: Summary of Draft Findings**

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Planning & EIA  
Design  
Landscape Planning  
Landscape Management  
Ecology  
GIS & Visualisation

LUC LONDON  
43 Chalton Street  
London  
NW1 1JD  
T +44 (0)20 7383 5784  
[london@landuse.co.uk](mailto:london@landuse.co.uk)

Offices also in:  
Bristol  
Edinburgh  
Glasgow  
Lancaster  
Manchester



Land Use Consultants Ltd  
Registered in England  
Registered number: 2549296  
Registered Office:  
43 Chalton Street  
London NW1 1JD  
LUC uses 100% recycled paper

# Contents

<b>1</b>	<b>Introduction</b>	<b>1</b>
<b>2</b>	<b>Stage 1 – SA of Strategic Sites Alternatives</b>	<b>2</b>
<b>3</b>	<b>Defining Spatial Strategy Alternatives</b>	<b>4</b>
<b>4</b>	<b>Stage 2 – SA of Spatial Strategy Alternatives</b>	<b>6</b>
<b>5</b>	<b>Conclusions</b>	<b>17</b>
<b>Appendix 1</b>		<b>19</b>
	'Selection of Spatial Strategy Alternatives' document prepared by NEAs	19





# 1 Introduction

- 1.1 This Summary presents the draft findings of the Additional Sustainability Appraisal (SA) of the alternatives to providing growth in the North Essex Authorities (NEA) Plan Area.
- 1.2 The Additional SA of the North Essex Section 1 Local Plan followed a two stage process:
  - Stage 1 appraised strategic sites that could form part of alternative spatial strategies for the Section 1 Local Plan.
  - Stage 2 appraised alternative spatial strategies.
- 1.3 The SA of the strategic sites, which has fed into the SA of the spatial strategies, has been undertaken in a consistent and objective way, using assumptions for the SA objectives that have been applied in the same way for all strategic sites, using the same evidence base.
- 1.4 In carrying out the SA of the spatial strategies, an element of professional judgement has been required to interpret the findings of the individual strategic sites when combined into a spatial strategy, and taking into account existing commitments, Section 2 allocations, and strategic infrastructure.
- 1.5 In order to provide further context and evidence for the SA work, we carried out a review of academic research and guidance on urban form, which sought to identify the sustainability advantages and disadvantages of different approaches to delivering growth.
- 1.6 It should be noted that Quality Assurance checks of the Additional SA work are still being carried out, which may mean that there are some amendments and refinements to be made to these draft findings, which will be reflected in the final Additional SA Report. However, it is not considered that these will result in any fundamental changes to our conclusions.

## 2 Stage 1 – SA of Strategic Site Alternatives

2.1 At the outset of the Additional SA work, LUC felt it was necessary not only to appraise alternative new settlement proposals, but also to consider alternatives to new settlements. The Inspector specifically requested that proportionate growth be appraised, and LUC felt it was appropriate to explicitly consider urban extensions as alternatives to new settlements, in order to provide a complete and comprehensive SA.

2.2 The NEAs identified 26 sites that could be considered to be 'strategic' in size to be subject to SA. The sites were (NEAGC = North Essex Authorities' Garden Community; ALTGC = Alternative Garden Community; SUE = Strategic Urban Extension; VE1 = Village Extension; C – CAUSE sites):

- NEAGC1 West of Braintree
- NEAGC2 Colchester Braintree Borders Garden Community (Marks Tey)
- NEAGC3 Tendring Colchester Borders Garden Community
- ALTGC1 Land West of Braintree
- ALTGC2 Land east of Silver End
- ALTGC3 North West Coggeshall (Monks Wood)
- ALTGC4 Land at Marks Tey Option One
- ALTGC5 Land at Marks Tey Option Two
- ALTGC6 Land at Marks Tey Option Three
- ALTGC7 Land at East of Colchester Option One
- ALTGC8 Land at East of Colchester Option Two
- ALTGC9 Land at East of Colchester Option Three
- ALTGC10 Land at East of Colchester Option Four
- ALTGC11 Langham Garden Village
- SUE1 Land at Halstead
- SUE2 Land East of Braintree (including Temple Border)
- SUE3 Land south east of Braintree
- SUE4 Land south of Haverhill
- VE1 Land at Kelvedon
- VE2 Land at Coggeshall
- VE4 Weeley Garden Village
- VE5 Tendring Central Garden Village
- C1 CAUSE Alresford
- C2 CAUSE Great Bentley
- C3 CAUSE Weeley
- C4 CAUSE Thorpe-le-Soken

2.3 It should be noted that:

- VE3 (which was the combination of the four CAUSE sites) was, instead, considered as four separate sites C1-C4 under Stage 1 of the SA, then as a coherent whole under Stage 2 of the SA.

- ALTGC1 was subject to initial SA but was not taken any further as it was too similar to NEAGC1.
  - ALTGC4 and ALTGC5 were subsequently merged into one site, ALTGC4.
  - VE2 was subject to initial SA but the NEAs subsequently determined that there is no longer capacity for strategic development as part of the site is consented and the smaller, unconsented residual is appropriately assessed as an option for the Section 2 Local Plans.
- 2.4 The SA was carried out using a set of assumptions applied to each SA objective, in order to ensure consistency in the appraisal process. An initial SA using Geographical Information Systems (GIS) was undertaken, and this was then supplemented by more detailed appraisal of each site.
- 2.5 The detailed appraisal was informed by information included in site information forms (SIFs). The SIFs, which were drafted by the NEAs, were provided to each promoter of a site in order to give them the opportunity to validate or amend the information prepared by the NEAs. The NEAs sought to minimise any further changes to the SIFs, restricting these to clarifications, and aspects of deliverability. The information included the infrastructure that could be anticipated to be delivered as a component of development at each site, in addition to housing.

## Summary of findings of the SA of alternative strategic sites

- 2.6 The overall performance of the alternative strategic sites against the SA objectives found that the difference between them was not that great. There were no sites that performed extremely well against all the criteria and no sites that performed extremely poorly.
- 2.7 For example, all of the sites could involve the development of potential mineral resources and best and most versatile agricultural land, and all could have a potential effect on heritage assets and biodiversity assets. Although there was some variation in the potential for effects between sites, the scale of the sites could provide scope for mitigation.
- 2.8 In summary, no 'showstoppers' were found at this stage of assessment, which meant that it was concluded that no individual sites could be ruled out on the basis of the SA alone.

### 3 Defining Spatial Strategy Alternatives

- 3.1 Taking into account the findings of Stage 1 of the SA, the NEAs proceeded to define alternative spatial strategies to be subject to SA during Stage 2 of the Additional SA process.
- 3.2 The spatial strategy alternatives are set out in the NEA document 'Selection of Spatial Strategy Alternatives', a copy of which is included at **Appendix 1** of this Summary. This document sets out seven principles which the NEAs established to guide the selection of spatial strategy alternatives to be subject to Additional SA. These are:
- Principle 1: Meet the residual housing need within the plan period
  - Principle 2: Test the alternatives suggested by the Local Plan Inspector
  - Principle 3: Reflect relative housing need and commuting patterns in any alternative strategy
  - Principle 4: Ensure alternative strategies are coherent and logical
  - Principle 5: Ensure alternative strategies are reasonable
  - Principle 6: Strategic sites will deliver a minimum of 2,000 homes within the plan period to 2033
  - Principle 7: All strategy options will deliver social infrastructure
- 3.3 As a result of applying these principles, some of the potential strategic sites from the assessment (due to various reasons, as set out in **Appendix 1**) were removed by the NEAs from inclusion in any of the alternative spatial strategies :
- ALTGC1 Land West of Braintree
  - ALTGC2 Land east of Silver End
  - ALTGC5 Land at Marks Tey Option Two (merged with ALTGC4)
  - ALTGC8 Land at East of Colchester Option Two
  - ALTGC9 Land at East of Colchester Option Three
  - ALTGC10 Land at East of Colchester Option Four
  - ALTGC11 Langham Garden Village
  - SUE4 Land south of Haverhill
  - VE2 Land at Coggeshall
  - VE4 Weeley Garden Village
- 3.4 The remaining strategic sites were included in alternative spatial strategies, along with proportionate growth alternatives.
- 3.5 In order to meet principle 3, the housing provision was split across the plan area on a west / east basis, to reflect that the relationship between Colchester and Tendring is different to that between Colchester and Braintree and, that in effect, the choice of strategy for the west of Colchester was not reliant on the choice of strategy to the east of Colchester to a significant degree, and *vice versa*. Breaking down the North Essex area in this way made comparisons between strategies easier and, in our view, more logical.
- 3.6 Taking all the above into account, the following 17 alternative spatial strategies set out in **Table 3.1** were appraised (note that Spatial Strategy West 4 has two variants at different scales of growth). It is considered that these represent an appropriate range of spatial strategies, in that they both respond to the advice of the Inspector and are suitable for the purposes of SA.

**Table 3.1: Spatial strategy alternatives**

<b>WEST OF COLCHESTER</b> <b>(Whole of Braintree and most of Colchester)</b> <b>Target of approximately 5,000 additional homes up to 2033</b>	<b>EAST OF COLCHESTER</b> <b>(Tendring and eastern part of Colchester)</b> <b>Target to deliver approximately 2,500 additional homes up to 2033</b>
<ol style="list-style-type: none"> <li>1. Proportionate (percentage-based) growth</li> <li>2. Proportionate (hierarchy-based) growth</li> <li>3. West of Braintree GC [NEAGC 1] + Colchester/Braintree GC [NEAGC 2]</li> <li>4. West of Braintree GC [NEAGC1] + Monks Wood GC [ALTGC 3] + Colchester/Braintree GC [NEAGC 2]  West 4a: smaller scale of West of Braintree [NEAGC1] + Monks Wood GC [ALTGC 3] + smaller scale of Colchester/Braintree GC [NEAGC2]</li> <li>5. Monks Wood GC [ALTGC 3] + Colchester/Braintree Borders GC [NEAGC 2]</li> <li>6. West of Braintree GC [NEAGC 1] + Monks Wood GC [ALTGC 3]</li> <li>7. East of Braintree [SUE 2] + Kelvedon [VE 1]</li> <li>8. Land at Halstead [SUE 1] + proportionate growth.</li> <li>9. West of Braintree GC [NEAGC1] + proportionate growth</li> <li>10. Colchester/Braintree GC [NEAGC2] + proportionate growth</li> <li>11. Monks Wood GC [ALTGC3] + proportionate growth</li> </ol>	<ol style="list-style-type: none"> <li>1. Proportionate (percentage-based) growth</li> <li>2. Proportionate (hierarchy-based) growth</li> <li>3. Tendring Colchester Borders GC [NEAGC 3]</li> <li>4. Colchester North-East Urban Extension [ALTGC 7]</li> <li>5. Tendring Central Garden Village [VE 4]</li> <li>6. CAUSE Metro Plan [C1, C2, C3 &amp; C4]</li> </ol>

## 4 Stage 2 – SA of Spatial Strategy Alternatives

### The approach to the SA of alternative spatial strategies

- 4.1 The majority of the alternative spatial strategies comprised different combinations of the strategic sites appraised in Stage 1 of the SA. The SAs of the alternative spatial strategies were informed by the SA of the strategic sites carried out in Stage 1, including information included in the SIFs. Each alternative spatial strategy included information on employment and the strategic infrastructure that would be needed to support delivery of the strategy.
- 4.2 With respect to the proportionate growth alternatives, or those alternatives where a strategic site was combined with an element of proportionate growth, a greater element of professional judgement was required, particularly for the spatial strategy alternative whereby each settlement would grow at the same percentage (18%), because specific sites were not identified. However, the SA for these alternatives was based on clear descriptions of how much development would go to each settlement, which provided a reasonable basis for coming to judgements.

### Plan period versus fully built out scenarios

- 4.3 The SA has assessed the Section 1 Local Plan alternative spatial strategies both within the plan period (i.e. to 2033) and when fully built out (no specified end date, but likely to be several years, if not decades, beyond the end of the plan period). This makes direct comparisons between the alternative spatial strategies difficult, because some (e.g. proportionate growth) will be delivered by 2033, whereas others that include major strategic sites will continue well beyond 2033. In a sense, this is comparing 'apples and pears'.
- 4.4 It should be noted that, although some spatial strategies only allocate development to the end of the plan period, development is, in reality, likely to continue beyond 2033. However there is no spatial strategy for this post-2033 development, although it could be presumed that development would continue in the same vein. The effects of the spatial strategies that involve major strategic sites will not be fully felt until well after the end of the plan period. Similarly, temporary effects related to their construction (e.g. noise and disturbance) are likely to be experienced over many years.
- 4.5 In addition, it should be noted that existing commitments and allocations in the Section 2 Local Plans already make up over 80% of the total housing required to be delivered within the plan period (approximately 35,600 of 43,200 homes). In this respect, those spatial strategies that seek to deliver the remaining approximate 7,500 homes within the plan period and no more could be considered too small in scale to be strategic. Conversely, although all spatial strategy alternatives seek to deliver the required additional 7,500 homes in the plan period, some could go on to deliver potentially as much as 35,500 additional homes beyond the plan period. In fact, taking into account the 7,500 they will deliver within the plan period, they could total a similar amount of housing that is planned for through the Section 2 Local Plans.
- 4.6 The Section 2 Local Plans already seek to focus development at existing settlements within North Essex, through Policy SP2 of the Section 1 Local Plan, according to settlement scales, sustainability and existing role. In this respect, some of the settlements are already likely to experience significant housing growth, such as:
- Colchester (18% growth).
  - Braintree (22%).
  - Clacton-on-Sea (10%).
  - Witham (22%).
  - Halstead (11%).

- Manningtree, Lawford & Mistley (25%)
- Kelvedon with Feering (42%).
- Hatfield Peverel (16%).
- Alresford (28%).
- Elmstead Market (24%).
- Great Bentley (27%).
- Thorpe-le-Soken (24%).
- Weeley (57%).
- Eight Ash Green (31%).
- Rowhedge (21%).
- Tiptree (22%).

4.7 This provides the context for the additional SA work, and the consideration of further growth, both within the plan period and beyond.

## Pros and cons of different urban forms

- 4.8 The review of research undertaken with respect to urban form, which looked at the in-principle pros and cons of new settlements, urban extensions and dispersed development provided some useful indicators as to how these different types of urban form compare in sustainability terms. This found that:
- Dispersed development, which bears many similarities with the proportionate (percentage-based) growth spatial strategy alternative appraised in the Additional SA, performs less well across a range of criteria than new settlements or urban extensions, for example in relation to travel patterns and modes of transport and the delivery of affordable housing.
  - New settlements and urban extensions can perform similarly, depending upon where they are located, and how they are designed and delivered.
- 4.9 For new settlements to perform well in sustainability terms, it is critical that the infrastructure is provided in the early stages of development in order to avoid unsustainable travel behaviours becoming embedded before sustainable transport alternatives become available, and to develop a sense of community cohesion. New settlements can involve a significant amount of embodied carbon by having to develop 'from scratch', although new settlements can be designed to be efficient in carbon terms, including inclusion of renewable energy and encouraging low carbon behaviours, such as sustainable modes of transport. Larger new settlements are more likely to attract economic activity.
- 4.10 Urban extensions can make use of existing infrastructure, or expansions to existing infrastructure, rather than having to start from scratch. If well integrated with the settlements they are attached to, they can offer immediate access to a range of existing jobs, services and facilities, although they can lack a sense of place. Larger urban extensions can also deliver their own services and facilities, economic activity, and the design features associated with new settlements with respect to sustainable travel and reduced carbon.
- 4.11 Viability and deliverability issues can affect both new settlements and urban extensions, but tend to be more pronounced with new settlements unless appropriate funding and governance structures are put in place. Dispersed development may have less in the way of upfront investment, but on the other hand can lead to an accumulation of development with insufficient investment in supporting services, facilities and infrastructure.
- 4.12 In terms of guiding principles, the research found that new settlements are likely to perform best when they are in close proximity to thriving towns and cities in order to share infrastructure and access to jobs and services during the early stages. On the other hand, there is a risk that such new development can draw resources and investment away from the towns and cities with which they are associated.



- 4.13 Of critical importance is that new strategic development should be located in areas with high public transport accessibility, for example along well-served bus corridors, and in close proximity to railway stations and other transport interchanges. The potential to extend existing networks, making better use of existing mainline stations or disused lines, and additional branches (e.g. rapid transit systems) through new neighbourhoods are considered to help make new strategic development more accessible and more successful.
- 4.14 In terms of design, connectivity is important, and the need to avoid severance by major roads and roundabouts. While landscape buffers and green space are to be encouraged, they should not threaten permeability and connectivity with surrounding land uses.
- 4.15 It is acknowledged in the research that the achievement of 'self-containment' is an unrealistic ambition given the choice of modes of transport available to modern communities, but that if developments are of a sufficient scale, they can provide for many of the everyday needs of residents within the development, reducing the incentive to travel elsewhere. This can be helped by designing compact developments, which incorporate a mix of uses.
- 4.16 It is interesting to note that the Additional SA of the spatial strategy alternatives for North Essex largely mirrors the findings of the research. The proportionate growth alternatives, based on a simple percentage increase in growth of each settlement, performed relatively poorly against the SA objectives, whereas many of the new settlement and urban extension alternatives performed similarly. In some respects this is not surprising, because the strategic scale of development proposed under these alternatives is such that they are capable of including a range of services and facilities, including jobs, as well as supporting infrastructure.

## Summary of findings of the SA of alternative spatial strategies

### West of Colchester

- 4.17 As described above, the proportionate (percentage-based) growth spatial strategy alternative (West 1) performs less well across a number of the SA objectives than the other spatial strategy alternatives, and therefore can be considered less sustainable.
- 4.18 The remaining spatial strategy alternatives perform similarly, albeit with some differences between them:
- It is considered that the spatial strategy alternatives will all be capable of delivering the residual housing requirement (approximately 7,500 homes) within the plan period, and those that extend beyond the plan period will continue to deliver new homes for many years to come. This includes appropriate provision for affordable housing, and a mix of types and tenures, in line with North Essex policy objectives (SA objective 2). The only exception to this is West 2, being proportionate (hierarchical growth), which would require the delivery of 4,500 to 5,000 dwellings as an urban extension to the east of Braintree, which may be challenging to deliver within the plan period.
  - All spatial strategy alternatives are likely to have significant adverse effects on the existing communities affected by the large-scale developments, primarily because of the considerable change of character around existing settlements. However, several of the spatial strategy alternatives are considered to deliver significant positive effects when the new communities are delivered, due to their being designed as coherent settlements in their own right, with a range of services and facilities (SA objective 1).
  - The health benefits will tend to be delivered beyond the plan period, as the level of housing becomes sufficient to accommodate health care facilities at 4,500 dwellings (SA objective 3).
  - Given the scale of development proposed, all of the spatial strategy alternatives will be of sufficient size to incorporate local centres (SA objective 4) and employment land and other jobs (SA objective 5).
  - All of the spatial strategy alternatives could have adverse effects on biodiversity, and for West 3, West 4, West 4a, West 5, West 6, West 10, and West 11 this could be significant depending upon mitigation (SA objective 6). It should be noted that West 3, West 4, West 4a, West 5 and West 10 are located very close to Marks Tey Brick Pit SSSI, although being a geological SSSI it should be possible to mitigate and manage adverse effects. All spatial strategies

include development within SSSI 'Impact Risk Zones', whereby Natural England should be consulted for potential impacts, although this does not mean that they cannot be mitigated.

- With respect to shorter journeys, the majority of spatial strategy alternatives will have significant positive effects in the long-term as services and facilities, and jobs, are provided on site, although those strategies which involve building near existing facilities and services, or the provision of Rapid Transit System could achieve this within the plan period (SA objective 7).
- With regard to longer journeys, it is considered that those spatial strategy alternatives that include both access to a railway station, particularly on the Great Eastern mainline, as well as investment in a Rapid Transit System, will result in significant positive effects in the longer term (SA objective 7). This is because commuting patterns suggest that the primary commuting destinations for residents of Braintree are Chelmsford, Colchester, Uttlesford and London, and that Braintree, Chelmsford and London represent three of the top four commuting destinations for residents of Colchester. Therefore, those spatial strategy alternatives that include relatively easy access to a choice of sustainable transport modes (rail and rapid transit) perform most strongly.
- All of the spatial strategy alternatives could potentially have a significant negative effect on heritage assets (SA objective 9). In many instances, the heritage assets include Grade I and Grade II\* listed buildings either within the site or in close proximity.
- Although all of the spatial strategy alternatives are considered to have minor positive effects on carbon, this is primarily with respect to delivery on site, rather than from traffic. From a traffic perspective, those sites that perform strongest against SA objective 7 are also likely to perform strongest with respect to transport related carbon emissions (SA objective 10).
- None of the spatial strategy alternatives were identified as having significant effects with respect to water (SA objective 11), flood risk (SA objective 12) or air quality (SA objective 13).
- All of the spatial strategy alternatives were considered to have potentially significant adverse effects with respect to landscape (SA objective 14).
- All of the spatial strategy alternatives were considered likely to have potentially significant adverse effects with respect to minerals and likely to have significant adverse effects with respect to soils (SA objective 15).
- In many instances, there was uncertainty with respect to the effects identified as it may be possible to include mitigation, given the scale of the strategic sites that form components of many of the alternative spatial strategies, depending upon how development is designed and delivered.

4.19 In light of the findings of the SA, there is little to choose between the spatial strategies in terms of significant effects at the strategic scale (other than West 1, as noted above). However, the following observations using professional judgement may help to distinguish between them a little more than the objective, assumptions-led SA has achieved:

- The research into urban form suggests that access to good sustainable transport links and services is critical to the achievement of sustainability, and it also makes sense to work with established patterns of travel but seek to achieve changes in travel mode. Those strategies that combine both development focused on railway stations, particularly the Great Eastern mainline, and provision for Rapid Transit, are therefore likely to perform well.
- Those spatial strategies that do not include easy access to rail, especially to the Great Eastern mainline, could be considered to perform less well. For example, Halstead is not well connected in sustainable transport terms, and is not in the major commuting corridors, so those spatial strategies that include significant additional development at Halstead may be considered less sustainable than some of the other spatial strategies.
- On the other hand, those spatial strategies that focus a significant proportion of development along the Great Eastern mainline, for example West 3, West 4, West 5, West 7 and West 10, could, when coupled with development already committed or allocated in the Section 2 Local Plans, lead to the perception of continued urbanisation of the Great Eastern mainline/A12 corridor. Consultations during the SA have also highlighted the lack of capacity on the mainline services to accommodate more passengers at peak times.

- Some strategies rely on Rapid Transit to be successful, including West 3, West 4 and West 4a, West 5, West 6, West 9 and West 11. We understand that developments in the order of 2,500 homes should enable Rapid Transit to begin to become viable, and that as the number of homes increases, services can become more frequent, viability improves, and extensions to the Rapid Transit System (RTS) can be considered. However, it should be noted that this is based on informal advice from the NEA's transport consultants and in the absence of formal evidence is subject to uncertainty.
- Braintree is already earmarked for 22% growth in the plan period, through commitments and Section 2 allocations. Urban extensions to the east of Braintree, such as in spatial strategies West 2, West 7, West 8, West 9, West 10 and West 11 would increase this growth further. It should be noted that these strategies would result in the first encroachment of development east of the A120 Braintree bypass, and the bypass itself could act as a barrier to integration of new development with the town.
- The scale of development proposed, in particular under spatial strategy alternatives West 3, West 4, and West 5, is very significant (over 25,000 additional homes when fully built out). Once fully built out, each of these spatial strategies would provide more houses than there currently are in the town of Braintree (even before taking into account planned growth through commitments and Section 2 allocations). It is recognised that large scale development is more likely to attract investment, but it is also more likely to change the character of this part of North Essex. Primarily rural areas would become a chain of settlements linking into the existing settlements. This would particularly be the case for those strategies, such as West 4, which would see considerable development along the A120 corridor. It is also difficult to judge what the impacts may be on the existing settlements, which could either be positive (e.g. providing further support for jobs, services and facilities) or negative (e.g. diverting investment away from the existing settlements to new settlements).

4.20 With all the spatial strategies, given the scale of development proposed, there is considerable risk. If for any reason they are not delivered as planned, for example through lack of government funding, or changing market conditions, then delivery may not happen as quickly as anticipated, quality could be compromised, and some aspects may not be delivered as wished. For example, there may be choices to be made with respect to the delivery of affordable housing, a full range of services and facilities, open space, sustainable transport infrastructure and services. This is not to say that these will not be delivered, but simply to observe that development on this scale does carry the risk that its full sustainability potential may not be realised in practice. Much will depend upon funding and governance.

4.21 Summaries of the assessment findings for the sites West of Colchester within the plan period (**Table 4.1**) and when fully built out (**Table 4.2**) are included below.

**Table 4.1: Summary of SA scores for spatial strategies west of Colchester within the plan period**

		SA objective														
Strategy		SA1: Communities	SA2: Homes	SA3: Health	SA4: Centres	SA5: Economy	SA6: Biodiversity	SA7: Travel	SA8: Infrastructure	SA9: Heritage	SA10: Climate	SA11: Water	SA12: Flood risk	SA13: Air quality	SA14: Landscape	SA15: Minerals & soils
	West 1	--?/?	++?	--/0?	-	-	-?	--?/--?	+	--?/?	+	-?/?	0	0/-?	-?	--?/--
	West 2	--?/+	-?	+?/-	++	++	-?	++?/++?	+	--?/?	+	0/?	0	0/0?	--?	--?/--
	West 3	--?/+	++	+/-	++	++	--?	++?/++?	+	--?/?	+	0/?	0	0/-?	--?	--?/--
	West 4	--?/+	++	+/-	++	++	--?	++?/++?	+	--?/?	+	0/?	0	0/-?	--?	--?/--
	West 4a	--?/+	++?	+/-	++	++	--?	++?/++?	+	--?/?	+	0/?	0	0/-?	--?	--?/--
	West 5	--?/+	++	+/0	++	++	--?	++?/++?	+	--?/?	+	0/?	0	0/0	--?	--?/--
	West 6	--?/++	++	+/-	++	++	--?	++?/++?	+	--?/?	+	0/?	0	0/-?	--?	--?/--
	West 7	--?/+	++	+/-	+	++	-?	+?/+?	+	--?/?	+	0/?	0	0/0?	--?	--?/--
	West 8	--?/+	++	+/-	++	++	-?	+?/+?	+	--?/?	+	0/-?	0	0/0?	--?	--?/--
	West 9	--?/+	++	+?/-	++	++	-?	++?/++?	+	--?/?	+	-?/?	0	0/0?	--?	--?/--
	West 10	--?/++?	++?	+/-?	+	++	--?	++?/++?	+	--?/?	+	-?/?	0	0/-?	--?	--?/--
	West 11	--?/+	++	+?/-	++	++	--?	++?/++?	+	--?/?	+	-?/?	0	0/0?	--?	--?/--

**Table 4.2: Summary of SA scores for spatial strategies west of Colchester when fully built out**

		SA objective														
Strategy		SA1: Communities	SA2: Homes	SA3: Health	SA4: Centres	SA5: Economy	SA6: Biodiversity	SA7: Travel	SA8: Infrastructure	SA9: Heritage	SA10: Climate	SA11: Water	SA12: Flood risk	SA13: Air quality	SA14: Landscape	SA15: Minerals & soils
	West 1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	West 2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	West 3	--?/++	++	++/-	++	++	--?	++?/++?	+	--?/?	+	0/?	0	0/-?	--?	--?/--
	West 4	--?/++	++	++/-	++	++	--?	++?/++?	+	--?/?	+	0/?	0	0/-?	--?	--?/--
	West 4a	--?/++	++?	++/-	++	++	--?	++?/++?	+	--?/?	+	0/?	0	0/-?	--?	--?/--
	West 5	--?/++	++	++/0	++	++	--?	++?/++?	+	--?/?	+	0/?	0	0/0	--?	--?/--
	West 6	--?/++	++	++/-	++	++	--?	++?/++?	+	--?/?	+	0/?	0	0/-?	--?	--?/--
	West 7	--?/+	++	++/-	+	++	-?	++?/++?	+	--?/?	+	0/?	0	0/0?	--?	--?/--
	West 8	--?/+	++	+/-	++	++	-?	++?/++?	+	--?/?	+	0/-?	0	0/0?	--?	--?/--
	West 9	--?/+	++	+?/-	++	++	-?	++?/++?	+	--?/?	+	-?/?	0	0/0?	--?	--?/--
	West 10	--?/++?	++?	+/-?	+	++	--?	++?/++?	+	--?/?	+	-?/?	0	0/-?	--?	--?/--
	West 11	--?/+	++	+?/-	++	++	--?	++?/++?	+	--?/?	+	-?/?	0	0/0?	--?	--?/--

## East of Colchester

- 4.22 East of Colchester, the choice of strategies is more straightforward. As previously described for West of Colchester, proportionate (percentage) growth East of Colchester (East 1) also performs less well across a number of the SA objectives than the other spatial strategy alternatives, and therefore can be considered less sustainable. Similarly, proportionate (hierarchy) growth (East 2) does not perform well because it would lead to considerable development at Brightlingsea, which is not a sustainable location for strategic growth due to its poor accessibility and environmental sensitivities. Notably it would also fail to deliver sufficient housing within the plan period.
- 4.23 With respect to the remaining spatial strategies (East 3, East 4, East 5 and East 6):
- In the longer term, the effects on existing communities and also the effects arising from the new communities would be similar in terms of significance (SA objective 1).
  - All would deliver the homes required in the plan period (SA objective 2).
  - In terms of access to health care, East 3, East 4 and East 5 perform better than East 6 in the longer term, because they will provide for a scale of development sufficient to accommodate a health care facility (SA objective 3). On the other hand, East 5 could be subject to significant adverse effects from noise pollution.
  - East 3 and East 4 are considered to perform more strongly with respect to access to local centre facilities (SA objective 4) at the end of the plan period, however East 6 also performs well after the plan period.
  - East 3 and East 4 are considered to perform more strongly with respect to the economy (SA objective 5) at the end of the plan period, however East 5 also performs well after the plan period.
  - East 3 and East 5 are anticipated to perform better than East 4 and East 6 with respect to biodiversity (SA objective 6).
  - The main advantage of East 6 when fully built out is with respect to longer journeys and easy access to railway stations (SA objective 7) which is reinforced by the strong commuting relationship between Tendring and Colchester. This would also feed into effects on carbon emissions from traffic (SA objective 10). On the other hand, the rural locations could lead to longer journeys by car for those journeys where rail is not a realistic choice. For shorter journeys, East 3 and East 4 perform most strongly.
  - All of the spatial strategy alternatives could potentially have a significant negative effect on heritage assets (SA objective 9).
  - None of the spatial strategy alternatives were identified as having significant effects with respect to water (SA objective 11), flood risk (SA objective 12) or air quality (SA objective 13).
  - All of the spatial strategy alternatives were considered to have potentially significant adverse effects with respect to landscape, with the exception of East 3, where the landscape impact was considered to be potentially minor (SA objective 14).
  - All of the spatial strategy alternatives were considered to have potentially significant adverse effects with respect to minerals and likely to have significant adverse effects with respect to soils (SA objective 15).
  - In many instances, there was uncertainty with respect to the effects identified as it may be possible to include mitigation, taking into account the scale of the strategic sites, and how development is designed and delivered.
- 4.24 East 3 is the Garden Community proposed in the Section 1 Local Plan. Its main disadvantage compared to some of the other spatial strategies is that it is not on a rail link and as a result a Rapid Transit connection to Colchester and beyond is proposed. It is, though, close to the University of Essex, albeit separated by the A133 dual carriageway. The site is also separated from the urban area of Colchester by Salary Brook Local Nature Reserve, which will help to retain distinctiveness between the communities and act as a resource for both existing and new communities, but may act as a barrier to integration.

- 4.25 Although East 4 performs as well as some of the alternative spatial strategies for the East of Colchester, it would, in effect result in the complete surrounding of Bullock Wood SSSI by development, adding to the development that already exists to the west of this ancient woodland SSSI. In terms of maintaining ecological networks, and potential disturbance effects, this is considered to be a particularly significant risk. It also has no rail link into Colchester.
- 4.26 In many respects, East 5 performs as well as East 3, although no better. It has the advantage of an existing employment area on site, and would retain its own distinctiveness being separated by some distance from Colchester town. Its location on the A120 and its distance from Colchester could encourage a high proportion of journeys by car.
- 4.27 East 6 is designed to operate as a chain of settlements along the Clacton to Colchester rail route, with stations within walking distance and use of rail facilitated by proposed increases in the frequency of services. The chain of settlements would support one another, as well as link into Colchester as the main commuting destination. In this respect it has many advantages, although the rural location of the four settlements could encourage car journeys, notwithstanding the opportunity to travel by train. In other respects, this spatial strategy does not perform any better than the alternatives. It is being promoted by local people rather than landowners or developers, which suggests that it may have a groundswell of support, but it is less certain whether it is deliverable in practice, and therefore there are risks attached.
- 4.28 Summaries of the assessment findings for the sites East of Colchester within the plan period (**Table 4.3**) and when fully built out (**Table 4.4**) are included below.

**Table 4.3: Summary of SA scores for spatial strategies east of Colchester within the plan period**

		SA objective														
		SA1: Communities	SA2: Homes	SA3: Health	SA4: Centres	SA5: Economy	SA6: Biodiversity	SA7: Travel	SA8: Infrastructure	SA9: Heritage	SA10: Climate	SA11: Water	SA12: Flood risk	SA13: Air quality	SA14: Landscape	SA15: Minerals & soils
<b>Strategy</b>	<b>East 1</b>	--?/?	--	--?/0	-	+	--?	-?/-?	-?	--?/?	+	0/?	0	0/-?	--?	--?/--
	<b>East 2</b>	--?/?	--	?/0	++	++	--?	++?/-?	-?	--?/?	+	0/?	0	0/-?	--?	-?/--
	<b>East 3</b>	--?/++	++	+/-	++	++	-?	++?/+?	+	--?/?	+	0/0?	0	0/-?	-?	--?/--
	<b>East 4</b>	--?/++	++	+/-	++	++	--?	++?/+?	+	--?/0	+	0/0?	0	0/-?	--?	--?/--
	<b>East 5</b>	--?/++	++?	+?/--	+	+	-?	+?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
	<b>East 6</b>	-?/+	++	+0/?	+	?	--?	?/+?	+	--?/?	+	-?/?	-?	0/0	--?	--?/--

**Table 4.4: Summary of SA scores for spatial strategies east of Colchester when fully built out**

		SA objective														
		SA1: Communities	SA2: Homes	SA3: Health	SA4: Centres	SA5: Economy	SA6: Biodiversity	SA7: Travel	SA8: Infrastructure	SA9: Heritage	SA10: Climate	SA11: Water	SA12: Flood risk	SA13: Air quality	SA14: Landscape	SA15: Minerals & soils
<b>Strategy</b>	<b>East 1</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	<b>East 2</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	<b>East 3</b>	--?/++	++	++/-	++	++	-?	++?/+?	+	--?/?	+	0/-?	0	0/-?	-?	--?/--
	<b>East 4</b>	--?/++	++	++/-	++	++	--?	++?/+?	+	--?/0	+	0/0?	0	0/-?	--?	--?/--
	<b>East 5</b>	--?/++	++?	++?/-	+	++	-?	++?/-?	+	--?/?	+	0/0?	0	0/-?	--?	--?/--
	<b>East 6</b>	--?/++	++	+0/?	++	+	--?	+?/+?	+	--?/?	+	-?/?	-?	0/0	--?	--?/--





## 5 Conclusions

- 5.1 The SA of alternative strategic sites showed that many performed similarly against the SA objectives.
- 5.2 With respect to alternative strategic spatial strategies, the clearest conclusion is that those spatial strategies that rely solely on proportionate growth (percentage) are the poorest performing, but for others the differences are much more finely balanced. No spatial strategies stood out as performing much more strongly than the others. None of the spatial strategies are without challenges with respect to environmental assets, such as biodiversity, heritage, minerals and the best and most versatile agricultural land.
- 5.3 To the west of Colchester, the choice of strategy is complicated. Those alternatives that include urban extensions (e.g. to Braintree or Halstead) offer the opportunity to be integrated with existing settlements. However, east of Braintree would be severed from Braintree by the Braintree eastern bypass which represents an important eastern limit to the town. Halstead has no rail service and is not in the key commuting corridors.
- 5.4 The other alternatives tend to offer different combinations of new settlements and/or extensions of existing smaller settlements. Those that are associated with the Great Eastern mainline offer use of existing infrastructure and sustainable access to key commuting destinations including Colchester, Chelmsford and London (although concerns have been expressed by local people of the capacity of this route to cater for additional demand at peak times). The opportunity to introduce a coherent and integrated RTS system to cater for other commuting routes, particularly east-west and to Stansted could be of considerable benefit since these routes are currently poorly served by more sustainable modes of transport. Therefore those alternatives that offer a combination of both access to existing rail and investment in RTS perform strongly in sustainable transport terms.
- 5.5 To the east of Colchester, it appears to be a choice between three alternatives. East 1, being proportionate (percentage) growth does not perform well compared to the alternatives. East 2 does not perform well because it would lead to considerable development at Brightlingsea, which is not a sustainable location for strategic growth due to its poor accessibility and environmental sensitivities. East 4 has potentially significant biodiversity issues due to its potential impact on Bullock Wood SSSI. This leaves East 3 (the Garden Community on the Colchester/Tendring Borders), East 5 (Tendring Central Garden Village), and East 6 (the CAUSE Metro Plan).
- 5.6 East 6 offers the considerable advantage of being on an existing railway line which links into important commuting destinations for people in Tendring (Colchester and Clacton-on-Sea, Kirby Cross, Frinton-on-Sea and Walton-on the-Naze). Taken together, the four constituent growth locations along the railway line form a critical size to support a range of services and facilities, although individually they do not. They are also rural in character, and all four settlements are earmarked for considerable growth through existing commitments and Section 2 Local Plan allocations.
- 5.7 East 3 and East 5 offer similar opportunities to develop a coherent development that incorporates a good range of services and facilities. Both have the drawback of not being on a rail route, although East 3 offers the opportunity to be connected to Colchester and beyond by RTS and is close to the university. East 5 has the advantage of an existing employment area and good connections to the strategic road network.
- 5.8 It is therefore not possible to come to a definitive conclusion that any one strategy, whether west of Colchester or east of Colchester, is the most sustainable option. The advantage of the Section 1 Local Plan as it stands is that it provides clear direction for strategic development to accommodate North Essex over many decades to come and therefore more certainty in terms of coherence and investment, including in new transport infrastructure, services and facilities. However, some of the alternatives offer opportunities to deliver similar benefits.

- 5.9 It should be noted that the scale of development proposed in the Section 1 Local Plan is considerable and will change the character of parts of North Essex, and the effects on the role and function, and relationship between the new and existing settlements is uncertain – if they complement and support one another, then this would be of benefit, but if they compete for investment and resources this could be a dis-benefit. Some of the other alternatives propose a similar scale of development and therefore offer similar opportunities and risks. The alternatives that propose lower amounts of growth would be less likely to alter the character of North Essex and relationships between settlements, but on the other hand may be less likely to attract the scale of investment of the larger scale alternatives. In addition, in the longer-term, it is likely that there will continue to be a need for more development, and so in future years (planning to well beyond the plan period), similar decisions will need to be made about where the additional growth should go. Under the larger scale alternatives, this decision will already have been made.
- 5.10 Finally, it is worth mentioning that the pace of change of technology, the introduction of 'smart city' thinking, and planning for climate change (both in terms of a net zero carbon future, and adaptation to the effects of climate change), could result in changes in the way that we live our lives that are difficult to anticipate given our embedded lifestyles and, in particular, our reliance on fossil fuels and the private car. It is therefore important that any strategy is future proofed and flexible enough to accommodate these changes as and when they arise.

LUC

1 July 2019

## **Appendix 1**

'Selection of Spatial Strategy Alternatives' document prepared by NEAs

## Selection of Spatial Strategy Alternatives

The Stage 1 assessment of individual site-based options suggests that many of the alternatives perform similarly against the various sustainability criteria and for the majority of sites, there are no alternatives that stand out as being particularly desirable or undesirable. The consequence of this outcome for Stage 2 of the assessment is that there are theoretically a significant and unwieldy number of permutations in which different sites could be combined to form an overall spatial strategy for North Essex. For every site option to be combined with every other potential alternative site and then tested as a spatial strategy in its own right would be an unmanageable task and therefore it is important to apply some common sense judgement to determine what a reasonable number of alternative options would be, based on some reasonable planning principles. Indeed the Local Plan Inspector states in his 8<sup>th</sup> June 2018 letter, in paragraph 118: *“It is not feasible to test every possible option through SA. Reasonable planning judgements have to be made on what to include. That is recognised in the legal requirement for reasons to be given for the selection of alternatives for assessment.”*

From the round table discussions involving different stakeholders held as part of the ‘check and challenge workshop held on 29<sup>th</sup> March 2019, a number of key principles, ideas, arguments and factors arose from the discussions. As taken from the record of the check and challenge workshop prepared by LUC, these included:

- Considering demographics, housing need and travel to work patterns to provide the right homes in the right places and to enable choice.
- Ideally each authority should seek to meet its own individual housing needs with their own area rather than crossing boundaries.
- Maximising the opportunities for sustainable travel and alternative means of travel including public transport, electric vehicles and cycles – focussing development on rail links where possible.
- Aspiring to achieve self-containment/self-sufficiency within new settlements but with strong connectivity to other settlements.
- Considering local attributes and settlements’ strengths and weaknesses in terms of infrastructure and environmental capacity.
- Treating viability, deliverability and cost benefit analysis as key determining factors.
- Utilising existing infrastructure capacity where it exists and only considering new settlements when the opportunities for proportionate growth around existing settlements have been exhausted.
- Avoiding scales of development that place additional burden on existing infrastructure without the means to increase infrastructure capacity.
- Empowering communities to plan the growth in their area (e.g. through Neighbourhood Planning) and ensuring communities are well informed.
- Promoting development that supports health provision and the prevention of ill health through health facilities and quality recreational space.
- Considering the impact on various environmental assets including heritage, landscape and biodiversity.
- Considering impact on the vitality and viability of existing town centres, especially if new centres are proposed as part of new developments.

- Considering the potential for new technologies to alter the way people work and commute in the future, including superfast broadband, 5G and driverless vehicles.
- Providing for a mixture of smaller and larger developments to ensure that both short term needs and longer-term strategic needs are met.
- Exploring opportunities for developments in locations with poor services and facilities where they could help to improve those assets for the benefit of all residents.
- Promoting long-term strategic developments that can deliver new infrastructure through economies of scale and a planned approach.
- Considering targeted (as opposed to proportionate) growth in certain areas where it would meet key objectives.
- Planning for strategic-scale growth, but not at the scale currently proposed as part of the Garden Communities.
- Developing a plan that only includes proposals to deal with housing need up to 2033 only.
- Ensuring there are sufficient guarantees over the timing and funding of infrastructure as part of any strategy.
- Expanding existing settlements in a sequential order until they meet their optimum size in terms of maximising self-containment and self-sufficiency.
- Directing development to locations that will support and deliver key transport links and key transport improvements to help tackle congestion problems. Maximising the use of previously developed brownfield land. Avoiding the coalescence of villages through the safeguarding of landscape buffers.
- Locating development close to employment opportunities and locations where new employment sites are likely to be viable.
- Directing more development towards the east and the more deprived areas of Tendring to help stimulate their regeneration.
- Considering large urban extensions where they can deliver rapid transit services to existing jobs, shops, services and facilities.
- Making sure the cumulative impacts of the development are taken into account.
- Assessing the West of Braintree Garden Community in combination with proposals for growth in Uttlesford.

These ideas have all been taken into account along with the Local Plan Inspector's specific comments both by LUC in developing the methodology for the additional Sustainability work and by the NEAs in developing an overarching set of principles to guide the planning judgement that has been applied in the selection of a reasonable set of spatial strategy alternatives for assessing. These seven principles are set out below.

### **Principle 1: Meet the residual housing need within the plan period**

As a basic principle, any spatial strategy alternative should, as a minimum, meet the objectively assessed housing need for housing in North Essex for the remainder of the plan period to 2033 plus a reasonable level of flexibility (as is currently the case) to guard against the prospect of certain sites not coming forward for development when expected – whether that is through a strategy that identifies sites for the plan period only, or a strategy that identifies larger strategic sites that will deliver homes both within the plan period and beyond.

As set out in Policy SP3 in the Section 1 plan, the total minimum housing requirement for the period 2013 to 2033 is 43,720 – a figure that has already been found to be based on sound evidence by the Local Plan Inspector and of which approximately 11,000 have already been built in the period 2013-2019. Between 2019 and 2033, approximately 31,000 homes are expected to be delivered across North Essex on existing sites with planning permission and on sites allocated in Section 2 Local Plans. For the purposes of the further Sustainability Appraisal Work, it is assumed that the Section 2 allocations will be found to be sound through the examination process; and that together with existing planning permissions, they will deliver the above-mentioned 31,000 homes within the plan period and there is no intention to deallocate any of these sites. Site allocations in the three Section 2 Local Plans have been the subject of separate Sustainability Appraisals which will be examined, in due course, through the future Section 2 examinations.

Taking into account the above planning permissions and Section 2 allocations, the residual requirement for housing in the plan period to 2033 (for which additional sites are required) currently sits at around 2,000 homes. Whilst, in the context of the overall housing need this is relatively modest requirement, it is common planning practice to ‘over-allocate’ land for development to keep to a minimum the risk of the housing need not being met within the plan period because of certain sites failing to come forward for development when expected - for a range of unpredictable reasons. In the current Section 1 Local Plan, the strategy includes proposals for three Garden Communities that, together, are expected to deliver 7,500 in the period to 2033 – meeting and residual requirement for the plan period and incorporating a healthy level of over-allocation whilst also providing locations for longer-term growth beyond the plan period and into subsequent plan periods.

Therefore in testing alternative options to the current strategy, those alternatives must also aim to deliver an equivalent 7,500 homes (approximately) up to 2033 for them to be comparable.

## **Principle 2: Test the alternatives suggested by the Local Plan Inspector**

In his letter of 8<sup>th</sup> June 2018, the Local Plan Inspector Mr. Clews provided some clear advice as to the alternative options that should be tested through the Sustainability Appraisal. In paragraph 125 of his letter, the Inspector suggested that the alternatives should include, as a minimum:

- Proportionate growth at and around existing settlements
- CAUSE’s Metro Town proposal
- One, two or more GCs (depending on the outcomes of the first-stage assessment)

It is therefore important that these alternatives form part of the assessment.

Proportionate growth at and around existing settlements has been tested as part of the further Sustainability Appraisal work in two forms: a) a ‘percentage-based’ distribution of growth that sees each defined settlement (irrespective of their position in the settlement hierarchy) accommodating the same

percentage increase in new housing relative to their existing size and dwelling stock; and b) and 'hierarchy-based' distribution which actively prioritises growth around the larger settlements further up the settlement hierarchy which are generally best served by shops, jobs, services and facilities. These proportionate growth options seek only to deliver housing required to the end of the plan period to 2033 and can incorporate development sites of any scale necessary to meet that requirement. The purpose of testing proportionate growth scenarios is to determine whether or not there is any need for the North Essex Authorities to bring forward proposals for stand-alone settlements, Garden Communities or any other more strategic development proposals within this plan period.

CAUSE's Metro Town (now 'Metro Plan') concept is also part of the further Sustainability Appraisal work and, as a strategy, aims to focus growth on land around existing railway stations on the Colchester to Clacton branch line, namely at the villages of Alresford, Great Bentley, Weeley and Thorpe le Soken – all within the Tendring District. It is important that this concept is tested in combination with other options.

Different numbers and combinations of Garden Communities are also now tested in the further Sustainability Appraisal work including, notably, the Monks Wood proposal by Lightwood Strategic at a scale of development which reflects the site promoter's aspirations.

### **Principle 3: Reflect relative housing need and commuting patterns in any alternative strategy**

The North Essex area contains three local authorities for which housing need has been assessed as part of the Objectively Assessed Housing Needs Study. Through the current proposals in both the Section 1 and Section 2 Local Plans, the distribution of housing growth reflects, broadly, the relative housing needs of the three authorities i.e. that housing need is greater towards the west. These relative housing needs in turn also reflect commuting patterns and how they vary across the North Essex – for example a strong relationship of commuting from Tendring to Colchester for work and, to the west, the relationships between Braintree and Colchester with one-another and more widely with Chelmsford, London and Stansted.

Any alternative spatial strategy should also take the relative housing need and commuting patterns into account for them to be based upon reasonable evidence and logic. For example, there would be little sense in pursuing a spatial option that places all of the 7,500 homes currently proposed through Garden Communities in just one of the three districts because it would ignore the respective housing needs and the commuting patterns of the other two. There would also little sense in promoting a strategy that does not acknowledge or reflect important transport corridors in North Essex such as the A12, the A120 and/or rail connections.

To ensure all alternatives respect relative housing needs and commuting patterns, and to help distil the options down to a manageable number for testing, it is proposed that the North Essex area be divided into two notional sub-areas – namely 1) the area west of Colchester including Braintree and the western part of



Colchester borough and urban area; and 2) the area east of Colchester including Tendring district and the eastern part of Colchester borough and urban area. In accordance with the housing need and commuting patterns it would be reasonable to discount concentrating development at one end of the North Essex area and to expect any spatial strategies to broadly deliver around 5,000 dwellings west of Colchester and 2,500 east of Colchester.

Looking more closely at the residual housing requirements of the three individual authorities, Braintree, Colchester and Tendring are required to deliver an objectively assessed need derived requirement of 14,320, 18,400 and 11,000 homes between 2013 and 2033 respectively – a rough percentage split of 33%, 42% and 25%.

Between 2013 and 2019, actual dwelling completions in each authority were approximately 2,500, 5,500 and 3,000 respectively (11,000 in total) and the amount of development already expected to be delivered within the remainder of the plan period to 2033 through existing planning permissions, Section 2 Allocations and windfall sites in each authority amounts to approximately 11,000 12,000 and 8,000 respectively (31,000 in total). That leaves a 'residual' or remaining housing need within each authority (for which additional site allocations would be required) of approximately 2,000 i.e. 1,000 in Braintree (14,320 – 2,500 – 11,000); 1,000 in Colchester (18,400 – 5,500 – 12,000); and 0 in Tendring (11,000 – 3,000 – 8,000). In percentage terms, the split of this residual requirement is approximately: 50% Braintree, 50% Colchester and 0% Tendring as summarised, in very broad terms, in the table below.

Table 1

District	Objectively assessed housing requirement 2013-2033	Actual dwelling stock increase 2013-2018	Dwellings expected 2018-2033 from existing planning permissions, Section 2 allocations and windfall sites	Residual requirement 2013-2018 for which additional allocations are required	% split of the residual requirement by district
Braintree	14,320	2,500	11,000	1,000	50%
Colchester	18,400	5,500	12,000	1,000	50%
Tendring	11,000	3,000	8,000	0	0%

However, the current allocation in the Local Plan across the three authorities incorporates a healthy level of flexibility to provide a buffer for under delivery and to guard against the possibility that, for one reason or another, certain sites might not deliver as planned. This flexibility amounts to some 5,500 homes on top of the residual need of 2,000 which accounts for the 7,500 currently planned for through the three Garden Communities). If that 5,500 homes is allocated to the three authorities in proportion to their overall housing need (i.e. applying the 33:42:25 split), it would give 1,800 extra to Braintree, 2,300 to Colchester and 1,400 to Tendring (roughly 13% flexibility for each district over and above their respective OAN requirements).

For the Section 1 allocation of 7,500 homes to genuinely reflect the objectively assessed housing needs of each of the three authorities, it would need to be distributed as follows:

- Braintree: 2,800 (1,000 + 1,800)
- Colchester: 3,300 (1,000 + 2,300)
- Tendring: 1,400 (0 + 1,400)

If these figures are applied to the notional division of North Essex in west of Colchester and east of Colchester by simply dividing the Colchester figure in half, it would allocate the housing as follows:

- West of Colchester: 4,450 (made up of 2,800 at Braintree and 1,650 derived from half of Colchester's number)
- East of Colchester 3,050 (made up of 1,400 for Tendring and 1,650 derived from the other half of Colchester's number).

This would suggest that the current allocation of 5,000 homes to the two Garden Communities west of Colchester and 2,500 homes to the single Garden Community east of Colchester is broadly reflective of objectively assessed housing needs and it would therefore follow that any strategy that deviates significantly from this 2:1 ratio does not reflect the evidence of housing need. This general principle of testing options that reflect relative levels of need is also reflected, indirectly, in the Inspector's comments within paragraph 114 of his 8<sup>th</sup> June 2018 letter where he says *"it is difficult to see the logic of assessing Monks Wood as an alternative to [the Colchester/Braintree Borders Garden Community] CBBGC and to [the Tendring/Colchester Borders Garden Community] TCBGC, but not to [West of Braintree Garden Community] WoBGC, when appraising combinations of three GCs."* The logic behind assessing comparable options to the west of Colchester separately from comparable options to the east therefore appears to be in line with the Inspector's thinking.

#### **Principle 4: Ensure alternative strategies are coherent and logical**

For a strategy to be genuinely strategic, it should follow a coherent logic rather than being cobbled together from a 'mix and match' of different concepts and approaches. For example, a strategy for North Essex that incorporated entirely different approaches to growth in each of the three constituent authorities would not reasonably constitute a coherent strategy and would bring into question the benefit of having a joint strategic plan for North Essex. Neither would it be logical to have a strategy that, on the whole, follows the A120 corridor or other key transport corridors but in one location takes an entirely different path that does not reflect such corridors. As a general principle therefore, there ought to be some sensible logic behind any alternative strategy put forward for testing through the Sustainability Appraisal rather than an unnecessary assessment of every conceivable permutation of sites.

### **Principle 5: Ensure alternative strategies are reasonable**

If there is limited evidence to suggest that an option is likely to be delivered, it begs the question whether that option is reasonable. For example, if a site or sites have been put forward as an alternative concept but there is no evidence of any developer or land-promoter involvement or there are significant unresolved questions about the form of development, its infrastructure requirements or the willingness of landowners to bring a scheme forward, there is little sense in treating it as a reasonable alternative to what is currently proposed in the Local Plan. If an assumingly unreasonable site option had emerged from the Stage 1 assessment as performing notably stronger against the sustainability criteria than other alternatives, there may have been a case for investing more time and effort into working with the promoters to work the proposal up into a feasible scheme – however, the conclusion of the Stage 1 assessment has shown that this is not the case and that no one option performs significantly better or significantly worse than another. On this basis, it would not be unreasonable to discount options from the next stage of the process on the basis that the current evidence shows them to be unreasonable. The responses (or lack of response) from site promoters to the method scoping statement consultation, check and challenge workshop and deliverability and viability consultation has helped inform any decisions as to whether certain options are reasonable.

### **Principle 6: Strategic sites will deliver a minimum of 2,000 homes within the plan period to 2033**

With the exception of the proportionate growth scenarios where sites of any size could be combined in order to deliver the residual housing requirement, all the strategy options involving specific strategic sites assume that those sites will deliver a minimum of 2,000 homes within the remainder of the plan period up to 2033.

### **Principle 7: All strategy options will deliver social infrastructure**

All spatial strategy options will deliver the following infrastructure: early years, primary & secondary schools, youth centre provision, open space, bus services, local centre facilities, healthcare facilities and community meeting spaces.

### **Sites to be discounted from the Stage 2 Assessment**

The following list of sites tested as part of the Stage 1 assessment are proposed not to be carried forward into the Stage 2 assessment where different combinations of sites are tested as alternative spatial strategies. The main reasons for sites being discounted at this stage relate to either a lack of evidence to suggest there are reasonably deliverable proposals being advanced through the plan-making process at this time, or a lack of evidence to demonstrate that

they are reasonable options in practical planning terms. Some sites have been discounted because they overlap or form part of a larger site that is being carried forward into Stage 2 or, following responses to the engagement with site promoters, it has been decided to merge certain sites together.

**Table 2**

<b>Site</b>	<b>Reason for discounting</b>
ALTGC1 Land West of Braintree	This is a smaller part of the West of Braintree Garden Community but is not being actively promoted by any landowners or developers at the size of 2,000 dwellings. This option was therefore merged with NEAGC1.
ALTGC2 Land east of Silver End	This site is an eastern extension to Silver End village which is a larger village with a selection of civic and retail services, as such it is not expected that the proposal would be stand-alone. The site is promoted for 1,800 dwellings but large enough to be able to accommodate 2,500 dwellings, these proposals incorporated the route of the A120 (options 4/5 along) with a grade-separated junction as the primary access and it is not likely that existing junctions on the A12 and A120 could accommodate anticipated traffic growth without severe highway impact. Due to the proposal's limited scale, interdependence on Silver End, reliance on the delivery of the new A120 route and lack of clarity on new junctions, this site has been discounted.
ALTGC5 Land at Marks Tey Option Two	This site refers to land west of Marks Tey and is a subsection of the alternative Garden Community being independently promoted by L&Q, Cirrus Land and Gateway 120. The landowner has no desire to subdivide their scheme therefore this site was combined with ALTGC4 to form the full alternative Garden Community proposal. This was assessed through stage 1 as ALTGC4 thus ALTGC5 does no need to be carried forward to the Stage 2 assessment in its own right.
ALTGC8 Land at East of Colchester Option Two	Site not being actively promoted by any landowning party unlike the adjoining ALTGC7 which is being promoted by Gatesby Estates and is more likely to be a deliverable option. There are also concerns about achieving suitable road access and achieving a development of significant dwelling capacity that is also sensitive to the undulating landscape around the valley of Salary Brook.
ALTGC9 Land at East of Colchester Option Three	Forms the northern part of the current Garden Community proposal at NEAGC3 but is unlikely to be a desirable development on its own as it would fail to achieve desired links to the University of Essex and would not facilitate or incorporate the full A133/A120 link road which is a key component of the Garden Community scheme. The AECOM Report on Infrastructure, Planning, Phasing and Delivery suggests that the northern part of the Garden Community would most likely be developed in later phases most likely beyond the current plan period.
ALTGC10 Land at East of Colchester Option Four	Forms the southern part of the current Garden Community proposal but is unlikely to be a desirable development on its own as it would not facilitate or incorporate the full A133/A120 link road thereby lacking direct access to the strategic road network. It is likely that development would cause severe traffic problems for areas East of Colchester Town Centre which already operate at capacity. This option has been discounted in favour of the full development proposed

Site	Reason for discounting
	on the scale of NEAGC3 which would deliver the full link road.
ALTGC11 Langham Garden Village	Site no longer being actively promoted by its original proponent and considered to be an illogical northward extension to Colchester that breaches the strong defensible boundary formed by the A12 Colchester Bypass and threatens the sensitive landscape of the Dedham Vale Area of Outstanding Natural Beauty crossing the Essex/Suffolk border.
SUE4 Land south of Haverhill	Haverhill located outside of the Braintree district and the land in question at extreme north west corner of the Braintree thus there is poor compliance with the principle of developing along the A120 growth corridor. Any strategic development would have to take place in co-operation with West Suffolk Council. However West Suffolk Council is only just embarking on the preparation of a new Local Plan and is exploring issues and options – so plan making timetables for the two authorities are not currently aligned.
VE2 Land at Coggeshall	Envisioned by the LPA as a group of village extensions capable of achieving 2,000 dwellings in total. One of the larger sites (Cogg182) was granted outline permission in 2018 meaning that there is no longer capacity for a strategic scale development at this location.
VE4 Weeley Garden Village	Multiple ownership, no interest from landowners to work together to deliver a comprehensive scheme. Major development at Weeley considered as an option by Tendring District Council as part of its Section 2 Local Plan. Strategic growth at Weeley best tested as part of the CAUSE Metro Plan concept which involves different landowners and forms part of a more cohesive strategy involving other villages along the Colchester to Clacton branch line.

### Sites to be included in Stage 2 Assessment

The following list of sites tested as part of the Stage 1 assessment are proposed to be carried forward into Stage 2 where they will be assessed in different combinations, with explanations given.

Table 3

Site	Explanation
NEAGC1 West of Braintree	This is one of the three current Garden Community proposals in the submitted Section 1 Local Plan – against which alternative proposals are to be tested.
NEAGC2 Colchester Braintree Borders Garden Community (Marks Tey)	This is one of the three current Garden Community proposals in the submitted Section 1 Local Plan – against which alternative proposals are to be tested.
NEAGC3 Tendring Colchester Borders Garden Community	This is one of the three current Garden Community proposals in the submitted Section 1 Local Plan – against which alternative proposals are to be tested.
	Scheme being actively promoted by Lightwood Strategic. While the Local Plan Inspector has specifically suggested this

Site	Explanation
ALTGC3 North West Coggeshall (Monks Wood)	scheme be tested at an alternative at 5,000 and 7,000 homes (IED011, para123), Lightwood have confirmed though consultation responses that their evolved scheme stands at 5,500 dwellings.
ALTGC4 Land at Marks Tey Option One	Forms part of the Colchester Braintree Borders Garden Community and also independently promoted by L&Q, Cirrus Land and Gateway 120. AECOM Report on Infrastructure, Planning, Phasing and Delivery suggests that the land around ALTGC 4 and ALTGC 6 could form part of the earlier phases of development and could therefore be the areas of land likely to be preferred if a 'smaller' version Marks Tey development was to progress. Proposed that ALTGC 4 and ALTGC 6 be tested as part of an option that includes a greater number of 'smaller Garden Communities' (alongside Monks Wood and West of Braintree – see 'West 4' below).
ALTGC6 Land at Marks Tey Option Three	Forms part of the Colchester Braintree Borders Garden Community and also independently promoted by L&Q, Cirrus Land and Gateway 120. AECOM Report on Infrastructure, Planning, Phasing and Delivery suggests that the land around ALTGC 4 and ALTGC 6 could form part of the earlier phases of development and could therefore be the areas of land likely to be preferred if a 'smaller' version Marks Tey development was to progress. Proposed that ALTGC 4 and ALTGC 6 be tested as part of an option that includes a greater number of 'smaller Garden Communities' (alongside Monks Wood and West of Braintree – see 'West 4' below).
ALTGC7 Land at East of Colchester Option One	Site being actively promoted by Gatesby Estates and is effectively an urban extension to north east Colchester. Should be tested as a reasonable alternative to the Tendring Colchester Borders Garden Community and other alternatives proposed for the area east of Colchester.
SUE 1 Land at Halstead	Some of this land could form part of an urban extension to Halstead under a proportionate (hierarchy-based) growth option despite poor compliance with the principle of developing along the A120 growth corridor. The site would be capable of delivering dwellings beyond the plan period in reasonable proximity to the Tier 2 settlement of Halstead.
SUE2 Land East of Braintree (including Temple Border)	Could be considered both under a proportionate (hierarchy-based) growth option (with SUE 3) or as a strategic urban extension option in its own right given its proximity to the Tier 1 settlement of Braintree.
SUE3 Land south east of Braintree	Could be considered both under a proportionate (hierarchy-based) growth option (with SUE 3) or as a strategic urban extension option in its own right given its proximity to the Tier 1 settlement of Braintree.
VE1 Land at Kelvedon	Some of this land could form part of an urban extension to Kelvedon to be tested alongside urban extensions to Braintree as a 'strategic urban extension' option, particularly as it aligns well with the A120 and A12 growth corridor.
C1, C2, C3, C4 CAUSE Metro Plan	Local Plan Inspector specifically requires the Metro Plan concept to be tested as a spatial strategy alternative. It is a logical concept which aims to focus growth on land around existing railway stations on the Colchester to Clacton branch line, namely at the villages of Alresford, Great Bentley, Weeley and Thorpe le Soken – all within the Tendring District. In taking housing need and commuting patterns into account, the option would be tested as an alternative to the

Site	Explanation
	Tendring Colchester Borders Garden Community and other alternatives proposed for the area east of Colchester.
VE5 Tendring Central	Scheme being actively promoted by Edward Gittins. Development in this location has been considered by Tendring District Council and discounted in the past, but the latest version is a larger development which does relate well to the A120 growth corridor and should be tested as a reasonable alternative to the Tendring Colchester Borders Garden Community and other alternatives proposed for the area east of Colchester (such as Metro Plan).

**Proposed Spatial Strategy Options (Table 4)**

<b>WEST OF COLCHESTER</b> <b>(Whole of Braintree and most of Colchester)</b> Target of approximately 5,000 additional homes up to 2033	<b>EAST OF COLCHESTER</b> <b>(Tendring and eastern part of Colchester)</b> Target to deliver approximately 2,500 additional homes up to 2033
<ol style="list-style-type: none"> <li><b>1. Proportionate (percentage-based) growth</b> <i>[Resulting in a thin distribution of growth across both urban and rural settlements]</i></li> <li><b>2. Proportionate (hierarchy-based) growth</b> <i>[Resulting a strong focus for growth on Braintree, Halstead and Hatfield Peverel]</i></li> <li><b>3. West of Braintree GC [NEAGC1] + Colchester/Braintree GC [NEAGC2]</b> <i>[As currently proposed in the submitted Section 1 Local Plan]</i></li> <li><b>4. West of Braintree GC [NEAGC1] + Monks Wood GC [ALTGC3] + Colchester/Braintree GC [NEAGC2] and</b>   <b>West 4a: smaller scale of West of Braintree [NEAGC1] + Monks Wood GC [ALTGC3] + smaller scale of Colchester/Braintree GC [NEAGC2]</b>  <i>[Options involving three Garden Communities including Monks Wood]</i></li> <li><b>5. Monks Wood GC [ALTGC3] + Colchester/Braintree Borders GC [NEAGC2]</b> <i>[An alternative combination of two Garden Communities]</i></li> <li><b>6. West of Braintree GC [NEAGC1] + Monks Wood GC [ALTGC3]</b> <i>[Another alternative combination of two Garden Communities]</i></li> <li><b>7. East of Braintree [SUE2] + Kelvedon [VE1]</b> <i>[A non-Garden Community option proposing focussed growth at Braintree and Kelvedon]</i></li> <li><b>8. Land at Halstead [SUE1] + proportionate growth.</b> <i>[One alternative Garden Community alongside proportionate growth at existing settlements]</i></li> </ol>	<ol style="list-style-type: none"> <li><b>1. Proportionate (percentage-based) growth</b> <i>[Resulting in large increases in development at coastal towns]</i></li> <li><b>2. Proportionate (hierarchy-based) growth</b> <i>[Resulting in major development around Brightlingsea]</i></li> <li><b>3. Tendring Colchester Borders GC [NEAGC3]</b> <i>[As currently proposed in the submitted Section 1 Local Plan]</i></li> <li><b>4. Colchester North-East Urban Extension [ALTGC7]</b> <i>[Strategic urban extension across the Colchester/Tendring border]</i></li> <li><b>5. Tendring Central Garden Village [VE5]</b> <i>[New settlement at Frating at the A133/A120 interchange]</i></li> <li><b>6. CAUSE Metro Plan [C1, C2, C3 &amp; C4]</b> <i>[Development focussed on railway stations along the Colchester to Clacton branch line at Alresford, Great Bentley, Weeley and Thorpe le Soken]</i></li> </ol>



<b>WEST OF COLCHESTER</b> <b>(Whole of Braintree and most of Colchester)</b> Target of approximately 5,000 additional homes up to 2033	<b>EAST OF COLCHESTER</b> <b>(Tendring and eastern part of Colchester)</b> Target to deliver approximately 2,500 additional homes up to 2033
<p><b>9. West of Braintree GC [NEAGC1] + proportionate growth</b>  [One alternative Garden Community alongside proportionate growth at existing settlements]</p> <p><b>10. Colchester/Braintree GC [NEAGC2] + proportionate growth</b>  [One alternative Garden Community alongside proportionate growth at existing settlements]</p> <p><b>11. Monks Wood GC [ALTGC3] + proportionate growth</b>  [One alternative Garden Community alongside proportionate growth at existing settlements]</p>	

## Descriptions of the Options

### West 1: Proportionate (percentage-based) growth

The rationale behind each of the proportionate growth scenarios (West 1 & 2 and East 1 & 2) is to test the potential for accommodating the development currently expected to be delivered through Garden Communities within the current plan period on land in and around existing settlements – thus avoiding the need to establish any new ‘stand-alone’ settlements or other strategic-scale developments, at least until 2033. The Inspector has specifically requested that this option is assessed as part of the further SA work to help demonstrate whether or not a strategy involving the creation of new settlements is justified in the current plan period.

Under this particular option, it is envisaged that all defined settlements in North Essex across all three authorities, regardless of their position within the Local Plan settlement hierarchies would accommodate a pro-rata share of the remainder of the North Essex housing requirement for the period 2019 to 2033 including an element of flexibility – a level of approximately 40,000 homes. This represents an approximate 18% increase in dwelling stock above 2019 levels and under this percentage-based approach, each defined settlement would accommodate an 18% increase in housing over 14 years (2019-2033).

Taking into account homes already expected on sites with planning permission or otherwise allocated in Section 2 plans, many of the existing settlements would not need to accommodate any additional housing as they are already expected to achieve or exceed their 18% dwelling stock quota through existing proposals. There are however some settlements that would be expected to accommodate additional housing allocations under this percentage-based proportionate approach to achieve the remainder of the requirement. For the settlements in the area west of Colchester, these are summarised, in broad terms, in the table below.

Table 5.1

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Halstead	200-300	N/a	Existing employment allocations in Section 2 Local Plans to be retained and possibly expanded. Some of the additional developments might be accompanied by a range of new small employment areas or expansion of existing areas.	Halstead bypass desirable but not likely to be deliverable off the back of the relatively modest level of additional development that proportionate growth would bring.  Infrastructure proposed as a result of proposals in the
Colchester	100-199 (each)	N/a		
Coggeshall				
Black Notley				
Rayne				
Sible Hedingham				

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions	
Earls Colne	50-99 (each)	N/a		Section 2 Local Plans to be retained and, where necessary, expanded.	
Finchingfield					
Castle Hedingham					
Gosfield					
Panfield					
Wethersfield					
Aldham	1-49 (each)	N/a			The very thin spread of additional growth, particularly across smaller villages, would result in numerous developments of insufficient scale to accommodate new facilities such as schools or health centres. Such infrastructure might need to be delivered through pooled financial contributions towards expanding existing facilities or delivering new shared facilities for which land would need to be identified and acquired.
Birch					
Easthorpe					
Great Wigborough					
Layer Breton					
Little Horkesley					
Messing-Cum-Inworth					
Mount Bures					
Peldon					
Salcott					
Wormingford					
Bures Hamlet					
Great Bardfield					
Great Yeldham					
Steeple Bumpstead					
Ashden					
Audley End					
Belchamp Otten					
Belchamp St Paul					
Belchamp Walter					
Blackmore End					
Bradwell					

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Bulmer				
Bulmer Tey				
Colne Engaine				
Cornish Hall End				
Cressing				
Foxearth				
Gestingthorpe				
Great Maplestead				
Great Sailing				
Greenstead Green				
High Garret				
Helions				
Bumpstead				
Lamarsh				
Little Maplestead				
Little Yeldham				
Nounsley				
Pebmarsh				
Ridgewell				
Rivenhall				
Rivenhall End				
Shalford				
Shalford Church End				
Stambourne Chapelend Way				
Stambourne Dyers End				
Stistead				
Sturmer				
Surrex				

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
(Coggeshall)				
Terling				
Tilbury Juxta Clare				
Topplesfield				
White Colne				
White Notley				
Wickham St. Paul				

For the area west of Colchester, a percentage based growth strategy would result in a very thin spread of development through the various settlements with only Halstead having to accommodate additional allocations of 200+ dwellings and six other settlements accommodating 100+. The total amount of development generated through this percentage-based approach would deliver approximately 3,000 homes which is around 2,000 short of what might be expected from the area west of Colchester when applying principle 3 above. This indicates that the proportionate percentage-based approach would shift the majority of the additional development to Tendring and East Colchester, as can be seen under the East 1 option, albeit not to the extent by which such a strategy might be seen as altogether unreasonable.

## West 2: Proportionate (hierarchy-based) growth

Under this option, it is envisaged that development would be allocated to settlements in North Essex across all three authorities according to their position within the settlement hierarchy with the aim of directing growth towards the most sustainable locations.

Policy SP2 in the Section 1 Local, which sets out the spatial strategy for North Essex, states that existing settlements will be the principal focus for additional growth across North Essex within the Local Plan period with development being accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area. Under this hierarchy-based growth strategy, this principle is extended to deliver the full housing requirement for North Essex instead of part of the proposed growth being delivered through Garden Communities.

The hierarchy-based strategy involves 50% of the 40,000 homes between 2019 and 2033 going to the larger 'Tier 1' settlements of Colchester and Braintree; 20% to 'Tier 2' settlements such as Clacton, Harwich, Witham and Halstead; and 10% to 'Tier 3' settlements such as Frinton, Walton & Kirby Cross; Manningtree, Lawford & Mistley, Brightlingsea, Kelvedon and Hatfield Peverel. The remaining 15% would be delivered around smaller 'Tier 4' and 'Tier 5' settlements but with growth already accounted for through existing planning permissions and Section 2 housing allocations.

The Inspector has specifically requested that proportionate growth is assessed as part of the further SA work to help demonstrate whether or not a strategy involving the creation of new settlements is justified in the current plan period. Hierarchy based proportionate growth is a different interpretation to the proportionate growth option outlined under West 1. Appraising two different approaches ensures that proportionate growth has been properly and fully explored. For the settlements in the area west of Colchester, the hierarchy-based distribution of growth is summarised, in broad terms, in the table below.

Table 5.2

Proposal/site	Dwellings to 2033	Total dwellings	Employment Assumptions	Strategy-specific infrastructure assumptions
Land east of Braintree [SUE2]	4,500-5,000	N/a	The proposals for the Braintree site includes the provision of a range of leisure, employment and retail uses to complement the relocation of Braintree Football Club to the site. Approximately 10 hectares of B-use employment land in total is suggested as	<ul style="list-style-type: none"><li>RTS links to Braintree Town, Braintree Freeport, and Colchester</li><li>Millennium slipways at Galleys Corner Roundabout are required to provide additional capacity for initial phases (funded and expected to be constructed June</li></ul>
Hatfield Peverel	800 (each)	N/a		

Proposal/site	Dwellings to 2033	Total dwellings	Employment Assumptions	Strategy-specific infrastructure assumptions
Halstead			<p>being deliverable as part of the Braintree scheme alongside 5,000 dwellings.</p> <p>Smaller employment sites of around 2ha could be delivered alongside each of the developments at Hatfield Peverel and Halstead.</p>	<p>2020).</p> <ul style="list-style-type: none"> <li>• New route of A120 to provide a free-flow link in place of the Galley's Corner roundabout.</li> <li>• RIS funded A12 upgrading 2022 to 2025</li> <li>• Bypass for Halstead</li> </ul>

Like the percentage-based proportionate growth scenario, the hierarchy-based model results in many of the existing settlements not needing to accommodate any additional housing as they are already expected to achieve their share of the new homes increase through existing proposals. Unlike the percentage-based approach, however, the settlements that would be expected to accommodate additional housing allocations are fewer in number – meaning less of a ‘thin spread’ of development, but the scale of required growth in the affected settlements much greater, particularly for Braintree and, to a lesser extent, Hatfield Peverel and Halstead.

This approach would deliver around 6,000-6,500 additional homes in the area the west of Colchester which is substantially greater than the 5,000 that would be expected under a strict application of Principle 3 above. This demonstrates that a hierarchy-based approach shifts the focus of development to the west – mainly because Braintree is categorised as a Tier 1 settlement even though its existing dwelling stock and current proposals for development are significantly smaller than that of Colchester.

### West 3: West of Braintree GC [NEAGC1] + Colchester/Braintree GC [NEAGC2]

This option reflects what is already included in the submitted Section 1 Local Plan with development at two new Garden Communities, one west of Braintree and one on the Colchester/Braintree border around Marks Tey. In the submitted plan, each of these Garden Communities is expected to deliver 2,500 new homes within the remainder of the plan period to 2033. In terms of their long-term dwelling capacity, the Colchester Braintree borders proposal will potentially be more than double the size of that west of Braintree.

Under this option, the two garden communities are of a sufficient mass and distance from each other, and other town centres, to be capable of developing as standalone communities. The connection of the proposed garden communities, along the A120 corridor, means that RTS is an option. The Concept Feasibility Study (EB/008) provides evidence that 2,500 dwellings can be delivered in each garden community within the plan period. The two garden communities proposed will deliver a total of 5,000 dwellings to the west of Colchester within the plan period, as justified under principles 1 and 3. The total dwellings figure, which is within the range in the Submission Local Plan, is taken from evidence in the North Essex Local Plan (Strategic) Section 1 Viability Assessment Update report by Hyas Associates and thus reflects the most up to date position in respect of viability assumptions.

Table 5.3

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
West of Braintree GC NEAGC1	2,500	10,000	Evidence base document entitled 'Reconciliation of Cebr and Cambridge Econometrics Employment Scenarios and Floorspace Requirements for the North Essex Garden Communities – Cebr note for the North Essex Authorities recommends employment land figures for the Garden Community proposals. For West of Braintree, it suggests approximately 9ha by 2033, 26ha by 2050 and 43ha by 2071. For the Colchester/Braintree Borders, it suggests 4ha by 2033, 19ha by 2050 and 37ha by 2071. Totally built out, it is suggested that West of Braintree will likely deliver 43ha of employment land and Colchester/Braintree borders 37ha.	<ul style="list-style-type: none"><li>• RTS links to Braintree Town, Braintree Freeport and Stansted</li><li>• RTS links to Colchester and Braintree, with potential to link to London Stansted Airport.</li><li>• Strategic improvements to Marks Tey Railway Station.</li><li>• New junctions. Widening, and rerouting of A12.</li><li>• Bypass for A120.</li></ul>
Colchester/Braintree GC NEAGC2	2,500	21,000		



West 4: West of Braintree [NEAGC1] + Monks Wood GC [ALTGC3] + Colchester/Braintree GC [NEAGC2] and West 4a: smaller scale of West of Braintree [NEAGC1] + Monks Wood GC [ALTGC 3] + smaller scale of Colchester/Braintree GC [NEAGC2]

Under these options, there would be three new garden communities to the west of Colchester each of a smaller size overall than those proposed in the Section 1 Local Plan, but each expected to deliver around 2,000 homes in the remainder of the plan period to 2033. The three smaller garden communities would be west of Braintree, the Monks Wood site being promoted by Lightwood Strategic and at Marks Tey. The Inspector specifically requested that a range of options including more or fewer garden communities, including the Monks Wood proposal, are tested as he felt that these would be reasonable scenarios that the previous SA had failed to cover.

Under these scenarios, it is anticipated that each of the three locations – all well related to the existing A120, could reasonably deliver 2,000 dwellings (in line with Principal 6 explained above) i.e. around 6,000 in total for the area west of Colchester – slightly higher than the 5,000 expected from the two Garden Communities currently proposed in the Section 1 Local Plan. This reflects the likely delivery within the plan period of 2,500 dwellings for each site as evidenced in the Concept Feasibility Study for West of Braintree and Braintree Colchester borders GCs and the viability and deliverability site information form for Monks Wood, but adding in an element of flexibility as three garden communities are proposed.

The size of each proposed garden community under this option is less than options involving 1 or 2 garden communities because, whilst planning for longer term development through the delivery of garden communities this option, if taken forward, will be combined with development to the east of Colchester. An option involving a lower scale of development enables the SA to draw out the different effects, both positive and negative, from smaller and larger garden communities.

The total dwellings figures for West 4 for West of Braintree is within the range in the Submission Local Plan and is taken from evidence in the North Essex Local Plan (Strategic) Section 1 Viability Assessment Update report by Hyas Associates Ltd. The total dwellings figure for Marks Tey is within the range in the Submission Local Plan and includes land that is being independently promoted by L&Q, Cirrus Land and Gateway 120. The AECOM Report on Infrastructure, Planning, Phasing and Delivery suggests that this land could form part of the earlier phases of development and could therefore be the areas of land likely to be preferred if a smaller version Marks Tey development was to progress. The total dwellings figure for Monks Wood reflects the scale of development being promoted as set out in the viability and deliverability site information form.

The total dwelling figures for West 4a for each of the three sites is 5,500. This allows the NEAs to consider the likely sustainability effects of smaller scale development and facilitates a direct comparison of these three sites.

Table 5.4

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
West of Braintree GC NEAGC1	2,000	10,000	Evidence base document entitled 'Reconciliation of Cebr and Cambridge Econometrics Employment Scenarios and Floorspace Requirements for the North Essex Garden Communities – Cebr note for the North Essex Authorities recommends employment land figures for the Garden Community proposals. For West of Braintree, it suggests approximately 9ha by 2033, 26ha by 2050 and 43ha by 2071. For the Colchester/Braintree Borders, it suggests 4ha by 2033, 19ha by 2050 and 37ha by 2071. Totally built out, it is suggested that West of Braintree will likely deliver 43ha of employment land and Colchester/Braintree borders 37ha.	<ul style="list-style-type: none"> <li>• RTS links to Braintree Town, Braintree Freeport and Stansted</li> <li>• RTS links to Colchester and Braintree, with potential to link to London Stansted Airport.</li> <li>• Strategic improvements to Marks Tey Railway Station.</li> <li>• New junctions. Widening, and rerouting of A12.</li> <li>• Bypass for A120.</li> <li>• Sustainable transport link to Kelvedon Station</li> <li>• District centres</li> </ul>
Colchester/Braintree GC NEAGC2	2,000	17,000		
Monks Wood ALTGC3	2,000	5,500	<p>25h.2a for B 'uses' has been identified in the master plan /land use budget plan that underpins the Alder King Viability Report for Monks Wood (March 2019) at 5,500 homes. Estimated that 11ha would be delivered in the plan period up to 2033.</p> <p>16.2ha has been identified for Retail /District/Local Centre 'A' uses. Upper floors can provide alternative or additional B1 space to that within the 25.2ha referred to above</p>	

Table 5.4a

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
West of Braintree GC NEAGC1	2,000	5,500	Evidence base document entitled 'Reconciliation of Cebr and Cambridge Econometrics Employment Scenarios and Floorspace Requirements for the North Essex Garden Communities – Cebr note for the North Essex Authorities recommends employment land figures for the Garden Community proposals. For West of Braintree, it suggests approximately 9ha by 2033. For the Colchester/Braintree Borders, it suggests 4ha by 2033. It is suggested that these figures are doubled to 18 and 8ha respectively to correspond with the fully built out scenario of 5,500 homes at each development.	<ul style="list-style-type: none"> <li>• RTS links to Braintree Town, Braintree Freeport and Stansted</li> <li>• RTS links to Colchester and Braintree, with potential to link to London Stansted Airport.</li> <li>• Strategic improvements to Marks Tey Railway Station.</li> <li>• New junctions. Widening, and rerouting of A12.</li> <li>• Bypass for A120.</li> <li>• Sustainable transport link to Kelvedon Station</li> <li>• District centres</li> </ul>
Colchester/Braintree GC NEAGC2	2,000	5,500		
Monks Wood ALTGC3	2,000	5,500	<p>25h.2a for B 'uses' has been identified in the master plan /land use budget plan that underpins the Alder King Viability Report for Monks Wood (March 2019) at 5,500 homes.</p> <p>16.2ha has been identified for Retail /District/Local Centre 'A' uses. Upper floors can provide alternative or additional B1 space to that within the 25.2ha referred to above</p>	

### West 5: Monks Wood GC [ALTGC3] + Colchester/Braintree Borders GC [NEAGC2]

Under this option, there would be two Garden Communities to the west of Colchester but the Garden Community West of Braintree would be substituted with the Monks Wood proposal from Lightwood Strategic so the strategy would include Monks Wood and the Colchester/Braintree Borders Garden Community at Marks Tey. The focus of growth would therefore shift eastwards along the A120 corridor towards Colchester but further away from Braintree and Stansted.

This option would assume 2,500 homes being built at each of the two Garden Communities within the plan period to 2033 – delivering an equivalent number of homes to that already proposed through the Garden Communities in the Section 1 Local Plan. Longer-term however, a total of 26,500 homes are proposed.

Table 5.5

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Monks Wood GC ALTGC3	2,500	5,500	25h.2a for B 'uses' has been identified in the master plan /land use budget plan that underpins the Alder King Viability Report for Monks Wood (March 2019) at 5,500 homes. Estimated that 11ha would be delivered in the plan period up to 2033. Likewise, 16.2ha has been identified for Retail /District/Local Centre 'A' uses. Upper floors can provide alternative or additional B1 space to that within the 25.2ha referred to above	<ul style="list-style-type: none"> <li>• RTS links to Braintree Town, Braintree Freeport and Stansted</li> <li>• RTS links to Colchester and Braintree, with potential to link to London Stansted Airport.</li> <li>• Strategic improvements to Marks Tey Railway Station.</li> <li>• New junctions. Widening, and rerouting of A12.</li> <li>• Bypass for A120.</li> <li>• Sustainable transport link to Kelvedon Station</li> <li>• District centres</li> </ul>
Colchester/Braintree GC NEAGC2	2,500	21,000	Evidence base document entitled 'Reconciliation of Cebr and Cambridge Econometrics Employment Scenarios and Floorspace Requirements for the North Essex Garden Communities – Cebr note for the North Essex Authorities recommends employment land figures for the Garden Community proposals. For the Colchester/Braintree Borders, it suggests 4ha	

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
			by 2033, 19ha by 2050 and 37ha by 2071. Totally built out, it is suggested that Colchester/ Braintree borders scheme will likely deliver 37ha.	

### West 6: West of Braintree GC [NEAGC1] + Monks Wood GC [ALTGC3]

Under this option, there are two garden communities: the Colchester Braintree Borders Garden Community at Marks Tey would be substituted with Monks Wood and would be delivered alongside the Garden Community West of Braintree. The focus of growth would therefore shift westwards along the A120 corridor away from Colchester and more towards Braintree with the majority of development being within the Braintree district.

This option would assume 2,500 homes being built at each of the two Garden Communities within the plan period to 2033 – delivering an equivalent number of homes to that already proposed through the Garden Communities in the Section 1 Local Plan. Longer-term however, 15,000 homes are proposed.

Table 5.6

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Monks Wood GC ALTGC3	2,500	5,500	25h.2a for B 'uses' has been identified in the master plan /land use budget plan that underpins the Alder King Viability Report for Monks Wood (March 2019) at 5,500 homes. Estimated that 11ha would be delivered in the plan period up to 2033. Likewise, 16.2ha has been identified for Retail /District/Local Centre 'A' uses. Upper floors can provide alternative or additional B1 space to that within the 25.2ha referred to above	<ul style="list-style-type: none"> <li>• RTS links to Braintree Town, Braintree Freeport and Stansted</li> <li>• RTS links to Colchester and Braintree, with potential to link to London Stansted Airport.</li> <li>• Strategic improvements to Marks Tey Railway Station.</li> <li>• New junctions. Widening, and rerouting of A12.</li> <li>• Bypass for A120.</li> <li>• Sustainable transport link to Kelvedon Station</li> <li>• District centres</li> </ul>
West of Braintree NEAGC1	2,500	10,000	Evidence base document entitled 'Reconciliation of Cebr and Cambridge Econometrics Employment Scenarios and Floorspace Requirements for the North Essex Garden Communities – Cebr note for the North Essex Authorities recommends employment land figures for the Garden Community proposals. For West of Braintree, it suggests approximately 9ha by 2033, 26ha	

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
			by 2050 and 43ha by 2071. Totally built out, it is suggested that West of Braintree will likely deliver 43ha of employment land.	

### West 7: East of Braintree [SUE2] + Kelvedon [VE1]

Under this option, there would be no stand-alone Garden Communities to the west of Colchester at all. This non-Garden Community option would be different to the proportionate growth scenarios in that it would involve targeted growth in the form of two strategic urban extensions – one to the east of Braintree and one to Kelvedon – both within Braintree district. The focus of growth would therefore move away from Colchester with development to the west at Braintree and further south along the A12 corridor at Kelvedon.

Traditionally growth has been delivered across the NEAs through planned urban extensions to existing settlements, this option is a continuation of this approach. Both options are proposed to deliver 2,500 dwellings each within the plan period and a further 2,500 dwellings each beyond the plan period. Whilst the Inspector did not specifically request that non-garden community options are appraised as part of the Additional SA, the NEAs consider that the appraisal and consideration of urban extensions as a spatial strategy option will provide a useful comparison to the options involving garden communities. Land east of Braintree and land at Kelvedon have been selected as these sites meet the principles outlined above.

Table 5.7

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Land east of Braintree SUE2	2,500	5,000	The proposals for the site includes the provision of a range of leisure, employment and retail uses to complement the relocation of Braintree Football Club to the site. Approximately 10 hectares of B-use employment land in total is suggested as being deliverable as part of the Braintree scheme alongside 5,000 dwellings of which 5ha would be achieved in the plan period to 2033 alongside 2,500 dwellings.	<ul style="list-style-type: none"><li>• RTS links to Braintree Town, Braintree Freeport, and Colchester</li><li>• Millennium slipways at Galleys Corner Roundabout are required to provide additional capacity for initial phases (funded and expected to be constructed June 2020).</li><li>• New route of A120 to provide a free-flow link in place of the Galley's Corner roundabout.</li><li>• The delivery of the Kings Dene scheme (Kelvedon) is not contingent upon the prior (or eventual) construction of the dualled A120 or the 'Option D' alignment, nor does it prejudice the delivery of this alignment.</li><li>• RIS funded A12 upgrading 2022 to</li></ul>
Land at Kelvedon VE1	2,500	5,000	The proposals for Kings Dene include the provision of up to 36ha of employment land for B use class employment use (B1, B2 and B8). This land is to be provided in a highly accessible location to the south west of the	



Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
			site between the A12 and railway line. To complement the proposed employment land provision, opportunities also exist to provide B1 and non B class employment generating uses around the rail station as part of mixed used district centre and within local centres.	2025 <ul style="list-style-type: none"> <li>Alternative route from Coggeshall Road through the site to the A12 south west of Kelvedon. This provides the opportunity to remove through traffic from the restricted centre of Kelvedon and connect the Coggeshall traffic directly to the new A12 junction.</li> </ul>

### West 8: Halstead (SUE1) and proportionate growth

This option and the following three options, all involve development of one garden community alongside further proportionate growth. Each of the proposed garden communities to the west of Colchester that are included in the 'Sites to be included in Stage 2 Assessment' table are options (West 8, 9, 10 & 11).

The Inspector asked for a range of garden community options to be appraised, including 1, 2 or more garden communities. As the housing requirement to the west of Colchester under Principle 3 is for approximately 5,000 dwellings in the plan period and one strategic site [i.e. at Halstead] is only realistically capable of delivering 2,500 dwellings in the plan period, the remaining development would be delivered through proportionate growth around existing settlements. The total dwellings for site SUE1 at Halstead reflects what the site promoter believes is achievable on the site, as set out in the viability and deliverability site information form.

The proportionate growth for other settlements west of Colchester follows the 'hierarchy-based' approach as explained under the West 2 option which, when compared to the 'percentage-based' approach (which spreads development very thinly across rural settlements) is considered to be the more sustainable approach. Where a strategic site is being proposed alongside proportionate hierarchy-based growth, the amount of development proposed under proportionate growth is set at half of what is proposed under option West 2. Essentially, this option would direct development to Halstead, Braintree and, to a lesser extent, Hatfield Peverel and would deliver approximately 5,500 homes which reflects, broadly the scale of growth required west of Colchester to meet housing needs in line with Principle 3.

Table 5.8

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Land at Halstead [SUE1]	2,500	8,000	Yes, please refer to accompanying note to site information form. The site provides an opportunity to enhance accessibility to (and/or expand) the Bluebridge Industrial Estate. 2ha of employment land suggested.  The proposals for the Braintree site includes the provision of a range of leisure, employment and retail uses to complement the relocation of Braintree Football Club to the site. 5ha of employment land suggested alongside 2,500 homes.	<ul style="list-style-type: none"><li>• Full Halstead Bypass</li><li>• Restore and restore dismantled railway Colchester Road to Tidings Hill as a new cycle and pedestrian route.</li><li>• RTS links to Braintree Town, Braintree Freeport, and Colchester</li><li>• Millennium slipways at Galleys Corner Roundabout are required to provide additional capacity for initial phases (funded and expected to be constructed June 2020).</li><li>• New route of A120 to provide a free-flow link in place of the Galley's Corner</li></ul>
Land east of Braintree [SUE2]	2,500	N/a		
Hatfield Peverel	400	N/a		

			Smaller employment sites of around 1ha could be delivered alongside development at Hatfield Peverel.	roundabout. <ul style="list-style-type: none"> <li>• RIS funded A12 upgrading 2022 to 2025</li> <li>• Bypass for Halstead</li> </ul>
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### West 9: West of Braintree GC [NEAGC1] and proportionate growth

This option involves development of one garden community and proportionate growth. Each of the proposed garden communities to the west of Colchester that are included in the 'Sites to be included in Stage 2 Assessment' table are options (West 8, 9, 10 & 11).

The Inspector asked for a range of garden community options to be appraised, including 1, 2 or more garden communities. As the housing requirement to the west of Colchester is for approximately 5,000 dwellings in the plan period and the West of Braintree Garden Community is only capable of delivering 2,500 dwellings in the plan period, proportionate growth is also required under this option to make up the remainder. That remainder under this option is formed by applying half the development expected under the hierarchy based approach to proportionate growth as set out per West 2. The total dwellings figure, which is within the range in the Submission Local Plan, is taken from evidence in the North Essex Local Plan (Strategic) Section 1 Viability Assessment Update Report by Hyas Associates (June 2019).

The proportionate –hierarchy-based growth that would be delivered alongside the Garden Community would result in a strong focus of development around Braintree with major developments to the east and the west. This option could deliver around 6,000 homes which reflects, broadly the scale of growth required west of Colchester to meet housing needs in line with Principle 3.

Table 5.9

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
West of Braintree GC NEAGC1	2,500	10,000	Evidence base document entitled ‘Reconciliation of Cebr and Cambridge Econometrics Employment Scenarios and Floorspace Requirements for the North Essex Garden Communities – Cebr note for the North Essex Authorities recommends employment land figures for the Garden Community proposals. For West of Braintree, it suggests approximately 9ha by 2033, 26ha by 2050 and 43ha by 2071. Totally built out, it is suggested that West of Braintree will likely deliver 43ha.  Smaller employment sites of around 1ha	<ul style="list-style-type: none"><li>• RTS links to Braintree Town, Braintree Freeport and Stansted.</li><li>• RTS links to Braintree Town, Braintree Freeport, and Colchester</li><li>• Millennium slipways at Galleys Corner Roundabout are required to provide additional capacity for initial phases (funded and expected to be constructed June 2020).</li><li>• New route of A120 to provide a free-flow link in place of the Galley’s Corner roundabout.</li><li>• RIS funded A12 upgrading 2022 to 2025</li></ul>
Land east of Braintree [SUE2]	2,500	N/a		
Hatfield Peverel	400 (each)	N/a		
Halstead				

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
			could be delivered alongside development at Hatfield Peverel and Halstead.	<ul style="list-style-type: none"> <li>Bypass for Halstead</li> </ul>

### West 10: Colchester/ Braintree Borders garden community [NEAGC2] and proportionate growth

This option involves development of one garden community and proportionate growth. Each of the proposed garden communities to the west of Colchester that are included in the 'Sites to be included in Stage 2 Assessment' table are options (West 8, 9, 10 & 11).

The Inspector asked for a range of garden community options to be appraised, including 1, 2 or more garden communities. As the housing requirement to the west of Colchester is for approximately 5,000 dwellings in the plan period and the Colchester/Braintree Borders Garden Community is only capable of delivering 2,500 dwellings in the plan period, proportionate growth is also required under this option to make up the remainder. That remainder under this option is formed by applying half the development expected under the hierarchy based approach to proportionate growth as set out per West 2. The total dwellings figure, which is within the range in the Submission Local Plan, is taken from evidence in the North Essex Local Plan (Strategic) Section 1 Viability Assessment Update Report by Hyas Associates (June 2019).

Table 5.10

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Colchester/ Braintree Borders garden community NEAGC2	2,500	21,000	Evidence base document entitled 'Reconciliation of Cebr and Cambridge Econometrics Employment Scenarios and Floorspace Requirements for the North Essex Garden Communities – Cebr note for the North Essex Authorities recommends employment land figures for the Garden Community proposals. For the Colchester/Braintree Borders, it suggests 4ha by 2033, 19ha by 2050 and 37ha by 2071. Totally built out, it is suggested that the scheme will likely deliver 37ha. The proposals for the Braintree site includes the provision of a range of leisure, employment and retail uses to complement the relocation of Braintree Football Club to the site. 5ha of employment land suggested alongside 2,500 homes.	<ul style="list-style-type: none"> <li>RTS links to Braintree Town, Braintree Freeport and Stansted</li> <li>RTS links to Colchester and Braintree, with potential to link to London Stansted Airport.</li> <li>Strategic improvements to Marks Tey Railway Station.</li> <li>New junctions. Widening, and rerouting of A12.</li> <li>Millennium slipways at Galleys Corner Roundabout are required to provide additional capacity for initial phases (funded and expected to be constructed June 2020).</li> <li>New route of A120 to provide a free-flow link in place of the Galley's Corner roundabout.</li> <li>RIS funded A12 upgrading 2022 to</li> </ul>
Land east of Braintree [SUE2]	2,500	N/a		
Hatfield Peverel	400 (each)	N/a		
Halstead				

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
			Smaller employment sites of around 1ha could be delivered alongside development at Hatfield Peverel and Halstead.	2025 <ul style="list-style-type: none"> <li>• Bypass for Halstead</li> </ul>

### West 11: Monks Wood [ALTGC3] and proportionate growth

This option involves development of one garden community and proportionate growth. Each of the proposed garden communities to the west of Colchester that are included in the 'Sites to be included in Stage 2 Assessment' table are options (West 8, 9, 10 & 11).

The Inspector asked for a range of garden community options to be appraised, including 1, 2 or more garden communities. As the housing requirement to the west of Colchester is for approximately 5,000 dwellings in the plan period and the Monks Wood development is considered capable of delivering 2,500 dwellings in the plan period, proportionate growth is also required under this option to make up the remainder. That remainder under this option is formed by applying half the development expected under the hierarchy based approach to proportionate growth as set out per West 2. The total dwellings reflect what the site promoter believes is achievable on the site, as set out in the viability and deliverability site information form.

Table 5.11

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Monks Wood ALTGC3	2,000	5,500	25h.2a for B ‘uses’ has been identified in the master plan /land use budget plan that underpins the Alder King Viability Report for Monks Wood (March 2019) at 5,500 homes. Estimated that 11ha would be delivered in the plan period up to 2033. Likewise, 16.2ha has been identified for Retail /District/Local Centre ‘A’ uses. Upper floors can provide alternative or additional B1 space to that within the 25.2ha referred to above.  The proposals for the Braintree site includes the provision of a range of leisure, employment and retail uses to complement the relocation of Braintree Football Club to the site. 5ha of employment land suggested alongside 2,500 homes.  Smaller employment sites of around 1ha could be delivered alongside development at Hatfield Peverel and Halstead.	<ul style="list-style-type: none"><li>RTS links to Braintree Town, Braintree Freeport and Colchester</li><li>Sustainable transport link to Kelvedon Station</li><li>Realignment and upgrading of A120 route and junctions to accommodate traffic generated.</li><li>Millennium slipways at Galleys Corner Roundabout are required to provide additional capacity for initial phases (funded and expected to be constructed June 2020).</li><li>New route of A120 to provide a free-flow link in place of the Galley’s Corner roundabout.</li><li>RIS funded A12 upgrading 2022 to 2025</li><li>Bypass for Halstead</li></ul>
Land east of Braintree [SUE2]	2,500	N/a		
Hatfield Peverel	400 (each)	N/a		
Halstead				



### East 1: Proportionate (percentage-based) growth

For the area east of Colchester, the percentage-based proportionate approach to growth (explained in more detail under West 1 above) would generate the need for additional housing allocations in the following locations:

Table 5.12

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Clacton	1,000-2,000	N/a	Existing employment allocations in Section 2 Local Plans to be retained and possibly expanded. The Section 2 Local Plan for Tendring already includes a significant over-allocation of employment land to bring choice to the market. Employment land proposals for Clacton and Harwich in particular would have to be brought forward at an accelerated rate to support additional housing growth proposed under this scenario.  Some of the other additional developments might be accompanied by a range of new small employment areas or expansion of existing areas.	The link road currently proposed for north Clacton as part of the Hartley Gardens Strategic Development in Tendring’s Section 2 Local Plan would need to be funded and brought forward early to enable the rate of development to be accelerated and to enable the additional 1,000-2,000 homes to be delivered before 2033.  Increased development around Tendring’s coastal towns would also require the £1million upgrade to the A133/A120 roundabout at Frating to be undertaken early within the current plan period.  Generally, infrastructure proposed as a result of proposals in the Section 2 Local Plans to be retained and, where necessary, expanded or accelerated.
Harwich	500-999 (each)	N/a		
Frinton/Walton				
Brightlingsea	300-499	N/a		
West Mersea	200-299 (each)	N/a		
Wivenhoe				
St. Osyth	100-199 (each)	N/a		
Thorrington				
Little Clacton	50-99 (each)	N/a		
Dedham				
Ardleigh				
Bradfield				
Kirby-le-Soken				
Little Oakley				
Dedham Heath				

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Abberton and Langenhoe	10-49 (each)	N/a		The thinner spread of additional growth across the smaller villages, would result in numerous developments of insufficient scale to accommodate new facilities such as schools or health centres. Such infrastructure might need to be delivered through pooled financial contributions towards expanding existing facilities or delivering new shared facilities for which land would need to be identified and acquired.
Boxted				
Beaumont-Cum-Moze				
Great Bromley				
Great Holland				
Little Bentley				
Little Bromley				
Ramsey Village				
Tendring				
Wix				
Wrabness				
East Mersea				
Fingringhoe				

Under this percentage-based approach to proportionate growth, settlements to the east of Colchester would be delivering approximately 5,000 additional dwellings which is significantly above the 2,500 level proposed in the current Colchester/Tendring Garden Community and the proportion of growth that might be expected in applying principle 3. That said, the level of additional development is not wholly unreasonable in the context of the overall housing need – although a shift to the east does bring about questions over the ability for lower-value areas such as Clacton and Harwich to generate sufficient market demand to deliver the additional growth and also the environmental impacts of directing growth towards more sensitive locations on the coast. Because many of the rural settlements to the east of Colchester are already expected to deliver their fair share of growth through existing proposals, the focus for additional development under this option would indeed be on settlements around the coast, both in Tendring and in Colchester.

In the Section 2 Local Plan for Tendring, a significant amount of land around Clacton is already earmarked for new development and would be capable, in physical terms, of accommodating 1,000 to 2,000 additional homes – however the Section 2 plan makes conservative assumptions about how much development is realistically achievable on those sites within the plan period to 2033 and thus much of the strategic growth that is currently expected to take place beyond 2033 would somehow need to be accelerated under this scenario to achieve higher built-out rates in the period up to 2033. Key road infrastructure projects in north Clacton and on the A133 at Frating would need to be delivered early to enable an accelerated rate of development.

The other coastal towns that would be affected by this growth scenario would be Harwich, Frinton/Walton, Brightlingsea West Mersea and Wivenhoe – all of which are environmentally sensitive in landscape and ecological terms (with close proximity to the European Designated sites) and physically constrained by the coast and peripheral locations. Brightlingsea and West Mersea are both served only by one road in and out with no rail services and an infrequent bus service. Wivenhoe is the subject of an adopted Neighbourhood Plan which limits the contribution of additional development it could make within the plan period to 2033.

### East 2: Proportionate (hierarchy-based) growth

For the area east of Colchester, the hierarchy-based growth scenario would only deliver around 1,500 homes against the 2,500 proposed at the Tendring/Colchester Garden Community.

Table 5.13

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Brightlingsea	900-1,000	N/a	Existing Section 2 Local Plan allocations for the Harwich area would need to deliver faster than currently anticipated. Additional employment land circa 3-4ha would be required at Brightlingsea to achieve a level of self-containment – particularly given the town's transport limitations.	Major transport infrastructure improvement for Brightlingsea would be required to enable it to accommodate such a high level of additional development and this might involve re-opening the historic railway line to Wivenhoe or constructing a second access road to the town.
Harwich	300-400	N/a		
Frinton/Walton	100-299	N/a		

This approach would only deliver around 1,500 additional homes in the area east of Colchester which is lower than the 2,500 that would be expected when applying Principle 3 and what is proposed at the proposed Tendring/Colchester Borders Garden Community.

Brightlingsea is the settlement that would be most greatly affected because it is town in the settlement hierarchy but one where growth has been limited due to its significant physical and environmental constraints and because of its limited transport network. A development of some 900-1,000 homes in this location would require the development of greenfield sites that are sensitive in landscape terms and within close proximity to the Colne Estuary which is an internationally designated wildlife site. It would also bring into question the adequacy of the current transport provision which is limited to a single road (the B1029) in and out of the town, a limited bus service and no rail provision. The re-opening of the historic branch line between Brightlingsea and Wivenhoe would be a popular choice, but would be extremely expensive in relation to the scale of development being proposed and the necessary engineering works would no doubt bring great disturbance to the Colne Estuary wildlife. Similarly the construction of a new road into Brightlingsea would be cost prohibitive and environmentally damaging – when weighed up against the amount of housing that would realistically be achieved.

### East 3: Tendring Colchester Borders GC [NEAGC 3]

This option reflects what is already included in the submitted Section 1 Local Plan with development at a Garden Community, east of Colchester. In the submitted plan, this Garden Community is expected to deliver 2,500 new homes within the remainder of the plan period to 2033. In terms of overall dwelling capacity, the Tendring Colchester borders garden community proposal will deliver 7,500 dwellings which is within the range in the Submission Local Plan and taken from evidence in the North Essex Local Plan (Strategic) Section 1 Viability Assessment Update (DRAFT) (Hyas Associates Ltd, May 2019) report and thus reflects the most up to date position.

Table 5.14

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Tendring/ Colchester Borders GC NEAGC3	2,500	7,500	Evidence base document entitled 'Reconciliation of Cebr and Cambridge Econometrics Employment Scenarios and Floorspace Requirements for the North Essex Garden Communities – Cebr note for the North Essex Authorities recommends employment land figures for the Garden Community proposals. For the Tendring/Colchester Borders Garden Community, it suggests approximately 7ha by 2033, 21ha by 2050 and 25ha by 2071. Totally built out, it is suggested that the scheme will likely deliver 21ha.	<ul style="list-style-type: none"><li>• RTS links to Colchester Town with potential to link to Braintree and London Stansted Airport.</li><li>• A120 to A133 link road with new junctions.</li></ul>

#### East 4: Colchester North-East Urban Extension [ALTGC 7]

Under this option, there would be no stand-alone Garden Community to the east of Colchester at all. This non-Garden Community option would be different to the proportionate growth scenarios in that it would involve targeted growth in the form of a strategic urban extension to the north-east of Colchester. This site could deliver 2,500 dwellings within the plan period and an additional 1,500 dwellings beyond the plan period.

Traditionally growth has been delivered across the NEAs through planned urban extensions to larger settlements, this option is a continuation of this approach. Whilst the Inspector did not specifically request that non-garden community options are appraised as part of the Additional SA, the NEAs consider that the appraisal and consideration of urban extensions as a spatial strategy option will provide a useful comparison to the options involving garden communities. This site has been selected as an option as it is being actively promoted and is effectively an urban extension to north-east Colchester.

Table 3.16

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Colchester North-East ALTGC7	2,500	4,000	None as the site is within walking distance to existing employment provision, including but not limited to, Severalls Business Park.	<ul style="list-style-type: none"><li>• Bullock Wood, which borders part of the site's western boundary, is a SSSI and ancient woodland. The site promoter recognises that this would require a minimum 15m stand off from built development which can be sensitively designed to incorporate this stand off.</li><li>• Link road between Ipswich Road and Harwich Road.</li><li>• RTS links to Colchester</li></ul>

#### East 5: Tendring Central Garden Village [VE 5]

This option involves the delivery of a Garden Community in Tendring district, adjacent to the A120 but detached from Colchester and Clacton. The site information form confirms that 2,500 dwellings can be delivered within the plan period, with a further 2,500 dwellings beyond the plan period. This is an alternative garden community to the proposed garden community in the Submission Local Plan and is the only alternative garden community proposed east of Colchester.

Table 5.15

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Tendring Central Garden Village VE5	2,500	5,000	In addition to the existing employment areas (Penguin Books, Manheim Auctions etc.): B1, B2 & B8 : 29.85 ha. Village Centre: 4.59 ha.	<ul style="list-style-type: none"><li>• Project includes delivery of omni-directional access between the A120 and A133 at the Oasis (Trunk Road) Junction.</li><li>• Community Woodland</li></ul> <p>The site information form states that improvements to the B1029 to a new Metro Plan Station at Thorrington will be delivered. This assumption can, however, only be made under options involving both Tendring Central and the Metro Plan but should not be considered under this option, which involves Tendring Central only.</p>

#### East 6: CAUSE Metro Plan [C1, C2, C3 & C4]

The Inspector has indicated that CAUSE's Metro Plan should be appraised as a spatial strategy option. This option represents both a short term and long term alternative to the garden communities proposed by the NEAs and the alternative garden community proposed under option East 5. Within the plan period, 2,800 dwellings are suggested, based on an average of 700 new homes being delivered at each of the four settlements and which will provide the East Colchester requirement with added flexibility. The longer term option, proposes 8,000 dwellings, which is comparable in scale to the Tendring/Colchester Borders Garden Community.

Table 5.16

Proposal/site	Dwellings to 2033	Total dwellings	Employment assumptions	Strategy-specific infrastructure assumptions
Alresford CAUSE	700	2,000	CAUSE's 1000 home appraisal allows for 6.5% employment land, the same proportion as for West Tey. In addition there will be agglomeration benefits arising from the excellent connectivity between Colchester, Clacton and the Metro villages which will create local jobs better than standalone settlements connected mainly to London. The Metro settlements will also provide support for existing businesses in adjacent villages. Based on above assumptions, employment land expectations are approximately 8ha each at Alresford and Great Bentley, 9ha at Weeley and 12ha at Thorpe le Soken.	Increased frequency of trains utilising the Colchester to Clacton/Walton branch line – as advised by CAUSE's transport advisor.
Great Bentley CAUSE	700	2,000		Early years, schools and health provision would be delivered in a way that be accessed via the branch line services. It would expected that each settlement would deliver a new primary school and early years facility, but only one new health facility and one new secondary school would be delivered and these would be located at one or two of the villages concerned – potentially the two central villages of Great Bentley and Weeley.
Weeley CAUSE	700	2,000		
Thorpe le Soken CAUSE	700	2,000		

Given the multitude of ownerships within the 800m circle around the four railway stations, the amalgamation and acquisition of the necessary land to deliver schools and health facilities would one of the main infrastructure challenges facing this strategy.



# Rapid Transit System For North Essex

From vision to plan  
1 July 2019

## Executive summary

### Introduction

The Garden Communities Charter states that 'garden communities will be planned around a step change in integrated and sustainable transport system for the North Essex area, which will put walking, cycling and public transit systems at the heart of the development, and be delivered in a timely way to support the communities as they grow.'

The charter explains that this means:

- an integrated approach between land use and transport planning;
- seeking a modern and rapid forms of public transport;
- introducing sustainable transport early within the development of garden communities; and
- providing a green infrastructure including safe, convenient and attractive walking and cycling routes.

This report provides a strategic plan detailing what such a rapid transit system for North Essex could look like, and how it can be delivered and afforded. There is a firm belief that the vision is achievable and will contribute significantly to wider policy objectives related to climate change and air pollution, providing healthy and active choices, and sustainable economic growth.

### Technological revolution

The UK is at the cusp of a revolution in technological solutions and personal transport choices<sup>1</sup> within which there is key role for rapid transit in successful towns. The fundamental challenge is to create the space to enable public transit to be rapid and reliable. If this is achieved, then transit solutions can evolve in response to innovation as and when it becomes practical to do so.

For North Essex, it is proposed that rapid transit aims towards introducing a system akin to a trackless tram. This combines the advantages of light rail with the practicality and flexibility of bus rapid transit. The system can be built up incrementally, growing alongside the garden communities. It adapts readily to early adoption of autonomous vehicle technology and, in time, the main

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<sup>1</sup> <http://www.demand.ac.uk/commission-on-travel-demand/>

trackless trams would co-ordinate with automated pods to take passengers to final destinations.



*Examples of rapid transit solutions and the desired level of segregation*  
 Sources: CRRRC TEC, [railexpress.com.au](http://railexpress.com.au)/Sydney Inner West Council

## Routes

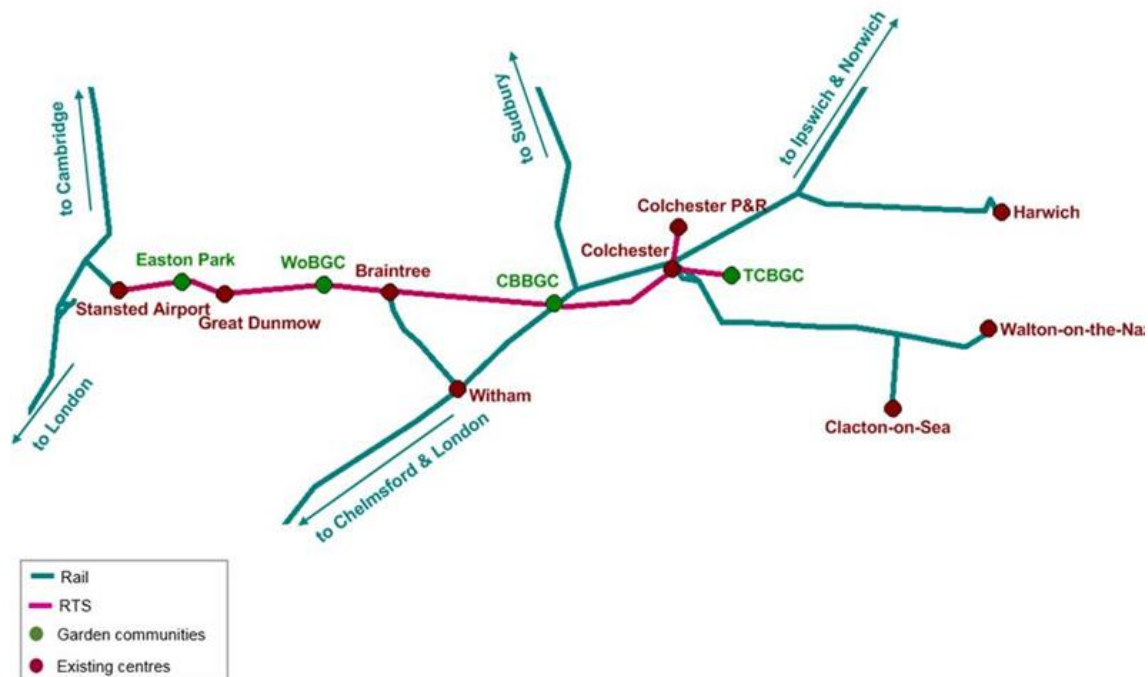
Trackless trams are a recent development which have been used in Zhuzhou, China. The aim will be to create a route network connecting key destinations across North Essex, which can be used by rapid transit vehicles and trackless trams, or equivalent technological solutions, once such systems are readily available. A key advantage of the strategy to develop a rapid transit route network is its adaptability to different technologies.

The dedicated routes, oftentimes alongside cycle lanes, will either be segregated or provide high levels of priority for rapid transit over other traffic. The latter arrangement would be used at locations where, for example, local access is needed. It is forecast that rapid transit will, over time, provide a genuinely practicable and attractive transport choice for many key destinations across North Essex and contribute to a virtuous circle of increasing sustainable travel. Prior to 2033 it is not expected that rapid transit vehicles will be driverless; it is only post 2033 that fully autonomous vehicles are expected to become a possibility.

This report identifies how the first four RTS routes can be incrementally created to deliver the space, priority and segregation required. It is expected that after

the first four routes are established the network of destinations served would expand.

- **Route 1** connects Tendring Colchester Borders Garden Community, a potential eastern park and ride site, the university, the main rail station, the hospital and the existing Colchester northern park and ride site;
- **Route 2** connects Colchester Braintree Borders Garden Community, a potential western park and ride site, the town centre and the rail station;
- **Route 3** is being planning jointly with Uttlesford District Council and connects Stansted with Braintree via the West of Braintree Garden Community; and
- **Route 4** connects Braintree and the Colchester Braintree Borders Garden Community, and in doing so connects the two subsystems that would have been created.



*Rapid Transit Network*

## Integration with transport and planning policy

To ensure success and the step change in public transport use implied by the vision, however, the report also identifies the principles for the image, quality and service standards which will guide design and operations. Furthermore,

those complementary measures and policies with which it is necessary for rapid transit to be co-ordinated are discussed, including:

- access to stops to maximise the catchment of potential users;
- road space reallocation to public transport and active modes;
- parking supply and demand changes including park and ride;
- interchanges and secondary services;
- ticketing and information; and
- following best practice for accessible and inclusive design.

## Viability

Given the routes, stop configurations and expectation of complementary measures, a transport model has been used to estimate the likely patronage on a rapid transit system at different stages of its development. The estimates have been adjusted to reflect pessimistic and optimistic futures, for example on the success of complementary measures.

The report shows that the capital cost is related to the amount of contribution that can be expected from garden communities in North Essex. Although contributions from central government sources are being sought in order to accelerate implementation and maximise benefits for all. Furthermore, reflecting the appeal of route choices that have been made, the rapid transit system is shown to be operationally viable from 2033, able to cover both maintenance and operational revenue costs.

## Conclusion

While there is much detailed work still to follow, it is hoped that this report provides a clear strategic plan to create a world class rapid transit system for North Essex - reimagining public transport affordably, swiftly and practicably - and so exceeding the aspirations embedded in the vision for garden communities in North Essex.



North Essex Authorities

Mode Share Strategy  
For the North Essex  
Garden Communities

July 2019





## 8. Conclusion and next steps

- 8.1 ITP's review of Census travel-to-work data revealed that, in the existing North Essex context, wherever public transport services and walk/cycle infrastructure are most-developed the mode share by these modes is higher. Furthermore, nearly 40% of existing commuter trips are shorter than five kilometres and could therefore be converted into trips by sustainable modes rather than those made by car.
- 8.2 We found that high sustainable mode share is achieved not only across Europe, but also in specific places in the UK. The conditions that contribute to highly sustainable mode share vary depending on factors such as social factors, scale, density, type of infrastructure provided, parking restraint and the physical arrangement of streets. A key finding in this report is that the most successful places for sustainable travel in the world are those which combine high quality walking, cycling and public transport infrastructure with constraints on car ownership and use.
- 8.3 Ultimately though there is nothing intrinsically 'Dutch' or 'Danish' about achieving high sustainable mode share - with the right investments and placemaking decisions they can be, and are, achieved in the UK. This report demonstrates which measures have been successful elsewhere and outlines the key elements that will be delivered in the GCs.
- 8.4 As well as detailing the range of measures required, the report sets out how each measure can be delivered in a phased way as development progresses across the GCs, including how it will be secured and who will deliver it. A range of complementary measures have also been set that will also be secured and help ensure delivery of a refined set of mode share targets for each of the GCs.
- 8.5 The range of measures set out in this report will form the basis of the transport strategies for each GC and will be secured by DPDs and enshrined in the emerging masterplans for each new community.



# Build out rates in the Garden Communities

North Essex Authorities



July 2019



## 11. Summary of Findings

11.1 The ***Start to Finish* report**, focuses primarily on housing building during a recessionary and post-recessionary period. Economic cycles are cyclical but it is **not a sound approach to base the build out rates of the Garden Communities** solely on data which is skewed towards the post-recessionary period. The report, however, highlights a number of factors which drive build out rates.

11.2 The Letwin Review considers further the key drivers of build out rates, and the constraints affecting the achievement of high build out rates. The Letwin Review identifies the absorption rate – the rate at which newly constructed homes can be sold, or are believed by the house builder to be able to be sold successfully into, the local market – to be the fundamental driver of build out rates. That absorption rate is largely determined by the type of home being construction, in terms of size, design, context and tenure.

11.3 The size and scale of **the Garden Communities allow for significant variation in the design and character of different neighbourhoods**. That will be secured through a Strategic Growth DPD for each community. This will ensure that numerous sales outlets are able to operate simultaneously whilst reducing the risk of direct competition (through the offering of different housing products).

11.4 The **Garden Communities’ policies require them to deliver a wide array of housing types and tenures** including affordable rent, affordable ownership, social housing, private rented, supported living housing, and key worker housing as well as housing for market sale.

11.5 The Letwin Review supports a **more involved public sector in the delivery of large residential sites** to ensure the diversification of housing products. This matches the intended delivery approach of the Garden Communities. **This collaborative approach to public and private working is enshrined in Policy SP7.**

11.6 The **comprehensive planning and delivery of the Garden Communities, secured by the DPDs, will ensure the timely delivery of infrastructure**, land remediation, utilities installation and site logistics.

11.7 The potential establishment of a **development corporation would substantially reduce risks** associated with planning approvals and infrastructure delivery.

11.8 Historically, **development corporations have delivered housing at rates far higher** than sites delivered by private developers. More recently, **the accelerating effect of development corporation status is demonstrated by recent housing delivery** at Ebbsfleet Garden City.

11.9 The Garden Communities are situated in a housing market area characterised by **strong housing demand**. Furthermore, adjacent strategic housing sites in North Essex have seen high build out rates despite being delivered a way less conducive to the accelerated delivery approach that is advocated in the Letwin Review. The strength of the local housing market in **North Essex therefore provides an excellent basis to maximise market absorption of new housing in the Garden Communities.**

11.10 **Strategic sites around the country have been planned and delivered at rates significantly higher than 250dpa**, most notably at sites in and around Milton Keynes, Otterpool Park, and Harlow and Gilston Garden Town. All of these developments have similarities with the North Essex Garden Communities which are conducive to accelerating build out rates, meaning that delivery rates of 300dpa are reasonable.

## 12. Conclusion

12.1 In conclusion, and following a review of the original evidence, current literature and additional evidence from other strategic sites, this Topic Paper has demonstrated that the build out rates anticipated for the Garden Communities are realistic and achievable.

12.2 Despite the evidence contained in this Topic Paper, the NEAs do not propose that the higher end of the evidenced build out rates (>500dpa) should be used for modelling purposes, but consider that adopting the 250dpa figure proposed by the Inspector would be overly cautious based on the evidence available and the context and attributes of the Garden Communities themselves.

12.3 Within Section 1 of their shared strategic Local Plans, the NEAs have committed to an approach that involves the public sector working pro-actively and collaboratively with the private sector to design and bring forward these Garden Communities (Policy SP7).

12.4 That approach, combined with the specifics of the scale and location of these communities, means the Garden Communities have the potential to deliver at far higher rates than other strategic developments. This model will likely not be unique to North Essex given the emerging support for more public sector involvement in the delivery of residential developments.

12.5 In light of this and taking account of the specifics of each Garden Community, the NEAs consider the following build out rates to be a reasonable basis for modelling purposes:

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Onwards
West of Braintree Garden Community	100	200	300	300	300	300	300
Colchester Braintree Borders Garden Community	150	300	300	300	300	300	300
Tendring Colchester Borders Garden Community	100	150	200	250	300	300	300

12.6 The NEAs have therefore modelled build out rates at an achievable, albeit conservative, figure of 300dpa although the authorities are in agreement that this figure could be substantially increased over time.



June 2019



Hyas

**North Essex Local Plans  
(Section 1)  
Viability Assessment Update  
Main Report**

# Executive Summary

## Overall Summary & Key findings

1. Viability assessment is a process of assessing whether a specific site can be considered to be financially viable, by looking at whether the value generated by a development is more than the cost of developing it. This includes looking at the key elements of gross development value, costs, landowner and developer returns.
2. This Viability Assessment Update Report considers the viability of the three proposed Garden Communities which are included in the shared Section 1 Local Plans prepared by the North Essex Authorities (Braintree District Council, Colchester Borough Council and Tendring District Council). It is an update of, and supplementary to, the previous Viability Assessment work published in 2017.
3. It has been prepared to address the matters raised through discussions at the Examination in Public in 2018 and incorporates updated and additional evidence that the North Essex Authorities have assembled in the intervening period. The study addresses the specific assumptions referenced by the Planning Inspector including the approach to contingencies, land costs, scheme financing and the pace of delivery.
4. There are many factors that will influence viability over time, and as such the analysis has considered a small number of high-level scenarios including a 'Reference Case' based upon current cost and value assumptions; 'Grant' related to securing funding from Government for early upfront strategic infrastructure, and 'Inflation' to recognise that over time all costs and values will be subject to inflation.
5. The overall key test of viability is to demonstrate sufficient competitive returns to landowners, developers and funders to incentivise them to bring land forward for development. Such returns must take into account the need for investment in strategic infrastructure and enable the delivery of policy compliant development, including appropriate levels of affordable housing. There are no fixed benchmarks as to what may be sufficient as sites such as the proposed Garden Communities have unique circumstances and infrastructure requirements incomparable to other schemes.
6. The analysis compares scheme costs against values to generate 'Residual Land Values' which can be considered as to whether they provide sufficient incentive beyond current, existing or acceptable alternative values for the land subject to potential redevelopment. The Garden Communities are proposed on predominantly greenfield land in agricultural use and are therefore of relatively low value.
7. The analysis demonstrates that all 3 proposed Garden Communities can be considered viable in that they are capable of producing Residual Land Values that will create significant uplift for landowners well in excess of existing/current values. This is

alongside generating sufficient profit for developers and investors to meet their requirements. With reference to each site assessed:

- The West of Braintree scheme produces the strongest position on viability under all modelled scenarios, due primarily to the area's strongest sales values;
  - Tendring Colchester Borders generates residual land values well in excess of existing use values, although the surpluses decrease when additional allowances for contingencies are at their highest. Should Grant be secured (such as via the current Housing Infrastructure Fund bid or any future equivalent funding opportunity) then viability is strong. Inflation would also have a major impact enhancing residual land values considerably;
  - The analysis shows that the Colchester Braintree Borders scheme is not capable of generating the required competitive returns to landowners under present day costs and values due primarily to the requirement for significant upfront investment in works to the A12. However, should the Housing Infrastructure Fund bid be successful (or wider Government funding secured) this would bring the site to a strong position. Inflation would have a major impact on this site and has the potential to drive significantly higher returns due to the longest delivery timescale.
8. The assessments reveal that for both Tendring Colchester Borders and Colchester Braintree Borders there is a degree of reliance on securing either Grant funding, and/or inflationary impacts. Such scenarios are both credible and realistic given the long history of Government support with infrastructure funding to enable housing growth, and trends in inflation over recent decades (including through periods of economic change and uncertainty).
9. It must also be recognised that the assessment work set out in this report presents a point in time consideration of viability that will need to be monitored and reviewed going forward. There will be a broad range of wider factors which will influence viability which may depress or enhance viability going forward. This study has taken a relatively prudent approach to many assumptions. Some aspects such as unforeseen costs or wider economic conditions may well depress viability. A wide range of other factors can improve viability over time such as enhanced value created through placemaking, construction cost efficiencies for example through the wider implementation of modular construction practices, inflation rates being higher than forecast, speedier delivery and ability to attract future Government investment.

## **Study Context**

10. This North Essex Local Plans (Shared Section 1) Viability Assessment Update Report has been prepared by Hyas Associates Ltd to provide a comprehensive update of the previous assessment work prepared and published as part of the evidence base for the Shared Section 1 of the Local Plans for Braintree, Colchester and Tendring (collectively known as the 'North Essex Authorities').



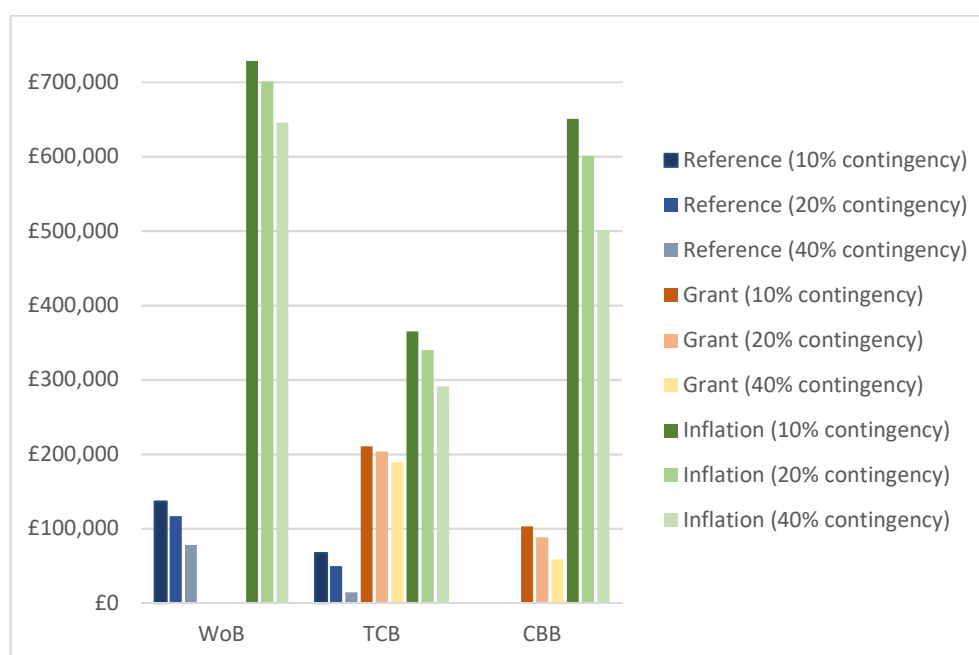
11. As the core spatial component of the Shared Section 1, this Viability Assessment Update Report considers the viability of the three proposed Garden Communities namely the West of Braintree Garden Community, Colchester Braintree Borders Garden Community and Tendring Colchester Borders Garden Community.
12. The approach utilises the same viability model to enable consideration of 'residual land values' as a key measure of scheme viability. The models have been updated to provide additional functionality to reflect the full development timescales of the projects concerned and address issues and matters as considered via the Examination in Public hearing sessions, and subsequent correspondence received by the North Essex Authorities (NEA) from the Planning Inspector in June 2018.
13. In light of the time since the original assessment was undertaken (with the previous assessment considering information available from 2016/2017) a number of important assumptions have been reviewed, reconsidered and updated in light of more up to date information and additional evidence that has been assembled by the North Essex Authorities. This has included key aspects such as assumptions relating to residential sales values, build costs, strategic infrastructure costs, anticipated build out rates, treatment of contingencies, developer profit rates, and the consideration of inflation.
14. Since the previous assessment was prepared, the Government has issued updated national planning policy and practice guidance specific to the consideration of viability. The shared Section 1 Local Plans will continue to be considered against policy and practice guidance relevant at the time of Submission of the Local Plans (i.e. before the updated material became available), but it is appropriate for this Viability Assessment Update to be aware of key changes, as viability will need to remain a live process that will be subject to ongoing review and consideration as proposals evolve into the future. The updated policy and guidance provides further clarity and direction to the consideration of matters such as the treatment of benchmark land value. It also aims to standardise the approach to viability testing, which will be of direct relevance to the approach in North Essex through the production of future site specific Development Plan Documents and consideration of future planning applications.
15. Given the early stage of concept evolution of each of the proposed Garden Communities, the approach remains strategic in nature, which in line with policy & guidance is proportionate and pragmatic in its approach. The assessments draw upon the most up to date set of data sources and assumptions and continue to present a general consideration of viability based upon the best available evidence. They examine the viability of illustrative concepts together with a wider range of sensitivity and scenario testing to provide a broad overview of viability under alternative circumstances. The results are highly sensitive to the assumptions underpinning the analysis, which undoubtedly will be subject to change over time.



## Viability of the Garden Communities

16. The core measure of viability entails a comparison of residual land values (after consideration of all scheme costs and values) to existing or realistic alternative values, to assess whether there is sufficient competitive uplift to incentivise landowners to bring sites forward for development. In addition, the models need to accommodate sufficient returns for developers to incentivise them to undertake direct construction activity.
17. As the Garden Community sites are greenfield in nature and in agricultural use, existing use values will be circa £10,000 per gross acre, with limited scope for alternative uses. Figure ES1 below sets out the summary findings of the Viability Assessment Update, illustrating the residual land values related to the various sites and scenario tests undertaken, which can be compared to such existing use values.

*Figure ES1 Summary Residual Land Values by Scenario*



18. The assessments reveal the following in relation to each of the proposed Garden Communities.
  - **West of Braintree Garden Community.** Under the Reference Case Scenarios residual land values range from £136,509/acre with 10% contingencies to £77,946/acre at 40% contingencies. The inflation scenarios all produce considerably higher residual land values beyond existing use values across all contingency rates, driven in part by the higher initial sales values and timescale of the development programme across over which inflation is compounded. No scenarios have been prepared to test the impact of securing Government grant funding for infrastructure as there are no live funding bids being considered.

- **Tendring Colchester Borders Garden Community.** Under the Reference Case Scenarios residual land values range from £67,394/acre at 10% contingencies to £14,529/acre at 40% contingencies. Should the current bids for Government funding via the Housing Infrastructure Fund be successful, residual land values would be lifted to between £210,504/acre at 10% contingencies to £189,411/acre at 40% contingencies. Inflation scenarios again produce considerably higher residual land values, albeit lower than the other sites due to the Garden Community having the lowest scale of development and shortest delivery timescale across which costs & value growth is compounded.
  - **Colchester Braintree Borders Garden Community.** The analysis indicates that under the Reference Case Scenarios the cashflow would be negative and therefore not achieve Existing Use Values. Should the current bids for Government funding via the Housing Infrastructure Fund be successful, residual land values would be lifted to between £102,913/acre at 10% contingencies to £58,702/acre at 40% contingencies. Inflation scenarios again produce considerably higher residual land values, which are strong due to the overall length of delivery timescale and application of cost and value growth over a considerably longer timeframe than the other 2 Garden Communities.
19. Additional analysis has been undertaken to consider returns in respect to the 'Internal Rate of Return' for any prospective master-developer and/or scheme funders taking account of the time/value of money through a discounted cash flow approach. This illustrates that rates of circa 7-10% are achievable based upon the scenarios as modelled which will exceed the anticipated average cost of finance.
  20. The test of viability is based upon the judgement of the achievability of such residual land values and consideration as to whether these provide suitable incentive to landowners to bring land to the market. There are no equivalent benchmarks against which such a judgement should be strictly applied, and it is not considered appropriate to define an arbitrary approach aligned with approaches from elsewhere which can not be considered as suitably comparable or relevant to the scale or context of the 3 Garden Communities under assessment.
  21. Consideration should therefore focus upon comparison to existing use or alternative uses for the sites that may be considered feasible. Agricultural land in the area is worth in the order of £10,000/acre and therefore sets a lowest possible benchmark for consideration. However judging viability against the equivalent existing use value does not recognise the need to incentivise landowners sufficiently for them to bring their land to market. It is difficult to accurately predict Alternative Use Values across the full site areas, although given the general location of the sites, they are generally unsuitable for redevelopment unless it was for large scale comprehensive redevelopment with associated infrastructure provision. The North Essex Authorities have the sites in the Shared Section 1 on the basis that such an approach is considered the most suitable. It therefore becomes a judgement as to the prospect of securing values in excess of any realistic alternatives.

22. The Viability Assessment Update has considered the various scenarios and shown under what conditions and circumstances certain scales of uplift can be achieved. The ultimate position cannot be fully predicated at this stage of the process, and an ongoing process of viability review will be needed to test proposals going forward.
23. The current analysis indicates that the West of Braintree scheme produces reasonably strong residual land values under the Reference Case scenarios even with the highest consideration of contingencies, with inflation driving far higher values over time.
24. Tendring Colchester Borders has lower residual land values, and the Reference Case indicates that higher contingencies would start to drive these down to a level akin to Existing Use Values. Should the current live Housing Infrastructure Fund bid be successful this would bring the site to a far stronger position. As per West of Braintree, inflation would also generate strong values.
25. Delivery of the 21,000 unit Colchester Braintree Borders is not capable of meeting Existing Use Values plus sufficient premium under present day costs and values and without investment to enable the implementation of upfront strategic infrastructure. However should the Housing Infrastructure Fund bid (or any future equivalent funding opportunity) be successful this would bring the site to a far stronger position. The impact of inflation would have a significant impact on this site and has the potential to drive significantly higher returns.

### **Wider considerations & influences**

26. It is important to acknowledge that the judgement of viability ought also reflect on wider factors which will influence viability, and the position taken within this Viability Assessment Update which may change the analysis over time. Aspects which may depress or enhance viability going forward should also be born in mind when making an ultimate judgement over the potential residual land values that may be achievable and the associated consideration of long-term viability. Such further considerations will include:
  - The impact of any property market downturn and/or economic shocks which may depress sales values and/or reduce market demand and the associated build out rate. Historical trend analysis can provide some context to the likelihood and extent of such issues, with the property market over time showing a degree of resilience and growth to overcome time limited market corrections;
  - Currently unforeseen or underestimated costs. The schemes are at relatively early stages in terms of the technical design and therefore the range and scale of costs may not as yet be appropriately identified. This requires appropriate consideration for potential cost over-runs as well as ongoing adjustments to reflect future occupier/consumer behaviour and technological change (for example influencing movement and associated transport implications). There may

also be changes in construction practices which may reduce costs, such as through modular construction which could have a significant impact on future build costs;

- The impact of quality placemaking which may well deliver a value premium over and above values currently being considered. Any enhanced sales values would improve overall viability;
- Cost or value inflation not being consistent. A relatively prudent approach has been taken within this Viability Assessment Update within the inflation scenarios which assumes value growth matches but does not exceed cost inflation. This is inconsistent with historical data and trends, albeit there can be no assurance that such trends would continue indefinitely into the future. Should sales values outpace costs this will have a significant impact on viability, with the converse also being true;
- The assessments have incorporated the current view on scheme delivery rates, which is in part informed by historical evidence and projects not truly comparable in scale or kind to the sites subject to this study. Any improvements in delivery rates would have a considerable impact on viability through reducing the development programme and overall financing costs. Site promoters are likely to intend to deliver the sites at a faster rate than as assumed within this study;
- The delivery model itself which may enable more efficient scheme delivery. For example, development may come forward under build under licence / lease arrangements to streamline delivery processes and enable savings such as through tax efficient approaches;
- There have been numerous funding initiatives implemented by Government in recognition that large scale strategic growth has additional challenges, in particular in relation to the need for early funding and delivery of strategic infrastructure. This includes initiatives such as the Local Infrastructure Fund, Large Sites Infrastructure Fund, Home Building Fund and the more recent Housing Infrastructure Fund. Given the importance of improving housing supply, and an ongoing recognition of the significance of delivery from large sites, it is reasonable to anticipate that such funding opportunities would continue to emerge over time to address any particular challenges as they may occur.

27. In conclusion, this Viability Assessment update report provides a comprehensive review of the current viability position across the sites, and addresses the issues and matters raised through the Examination in Public. It sets out the range of scenarios and resulting residual land values to enable consideration of viability.
28. It sets out that when considering the overall costs and values over the lifetime of the projects, residual land values are generated through the various scenario tests which are well in excess of Existing Use Values and can be considered to provide a sufficient return (premium) beyond reasonable alternatives to stimulate the market. The sites can be considered viable under a number of rational and reasonable defined scenarios.





# Employment provision for the North Essex Garden Communities

Centre for Economics and Business Research report for the North Essex Authorities

1<sup>st</sup> July 2019

**Disclaimer**

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**Authorship and acknowledgements**

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The report does not necessarily reflect the views of North Essex Garden Communities Ltd

London, July 2019

# Contents

<b>1. Introduction</b>	<b>4</b>
<b>2. Methodology</b>	<b>5</b>
Employment scenarios	5
Industrial sectors	6
Employment densities	7
Conversion to employment land requirement	8
<b>3. Summary of Results</b>	<b>9</b>

# 1. Introduction

- 1.1 In April 2017, Cambridge Econometrics and SQW produced an employment and demographic report for the North Essex Authorities<sup>1</sup>. This included scenarios for the population and employment of the Garden Communities, together with high-level estimates of employment space requirements.
- 1.2 In March 2019, the Centre for Economics and Business Research (Cebr) was commissioned to produce estimates of employment floorspace and employment land requirements for the three Garden Communities planned in North Essex. These estimates supersede the previous work done by Cambridge Econometrics and SQW.
- 1.3 In this note, we set out to present clearly and to a reasonable level of detail the assumptions used in the work to generate employment, employment floorspace, and employment land estimates.
- 1.4 Employment space estimates are for B class uses (industrial, office, and warehousing).
- 1.5 At the end of this document, results are summarised.

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<sup>1</sup> Colchester Borough Council, Braintree District Council, Tendring District Council and Essex County Council.



## 2. Methodology

### Employment scenarios

- 2.1 Cebr considered two main scenarios for employment levels in each Garden Community: the 'reference case and 'investment led'.
- 2.2 Colchester Borough Council provided 2022-2033 housing trajectories per Garden Community which informed employment scenarios. Figures provided are summarised in Table 1. After 2033, 300 dwellings per annum is assumed in each community until they meet the top end of the local plan range (13,000 for West of Braintree, 24,000 for Colchester Braintree Borders, and 9,000 for Tendring Colchester Borders). Results at the end of this note are included for each Garden Community in 2033, 2050, and the 'final state' completion of construction. This last year is different for each Garden Community: 2055 for Tendring Colchester Borders, 2068 for West of Braintree, and 2109 for Colchester Braintree Borders.

*Table 1: Annual housing trajectories to 2033/34 for the Garden Communities*

	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33
<b>West of Braintree</b>	100	200	300	300	300	300	300	300	300	300
<b>Colchester Braintree Borders</b>	-	-	-	-	-	150	300	300	300	300
<b>Tendring Colchester Borders</b>	100	150	200	250	300	300	300	300	300	300

- 2.3 In the reference case scenario, total employment in each Garden Community is exactly equal to number of dwellings.
- 2.4 The investment led scenario is based on previous scenario-based economic analysis carried out by Cebr for NEGCLtd. In this scenario, employment-to-population ratio in North Essex as a whole gradually increases to converge on the ratio forecast<sup>2</sup> for a set of comparators<sup>3</sup> in 2036. In 2016 North Essex's employment-to-population ratio was 38.5% and under this scenario it increases to 43.5% in 2036.
- 2.5 The investment led scenario for this piece of work assumes that the employment-to-population ratio remains constant from 2036 onwards, and that in each Garden Community it is identical to the rate across North Essex (i.e. this employment-to-population ratio is achieved across North Essex as a whole and within each of the Garden Communities).

<sup>2</sup> Based on Cebr's in-house local authority employment forecasts and ONS population forecasts, extrapolated as necessary

<sup>3</sup> West Essex, Cambridgeshire, Milton Keynes, Buckinghamshire, Oxfordshire, Berkshire, and Surrey

- 2.6 For the purposes of the employment calculations in the investment led scenario, population in each Garden Community is assumed on the basis of household size (i.e. the number of people per house) following the ONS 2016-based household projections for England to 2041 – after 2041, household sizes are assumed to remain constant at 2.26.
- 2.7 Estimated total employment numbers for each Garden Community in 2033, 2050, and on completion of construction ('final state') are summarised in the results section.

## Industrial sectors

- 2.8 A mix of industrial sectors was assumed for each Garden Community based on an assessment of their relative strengths and economic opportunities. Percentage of jobs in each of the ten high-level sectors under the Standard Industrial Classifications (SIC07) by Garden Community is shown in Table 2. These are based on adjustments to sectoral employment shares for the comparator regions implied by Cebr's in-house forecasts for GVA<sup>4</sup> by sector per local authority.

*Table 2: Assumed employment by sector from Cebr work*

	West of Braintree	Colchester Braintree Borders	Tendring Colchester Borders
<b>Agriculture, mining, electricity, gas, water and waste</b>	1.0%	1.0%	1.0%
<b>Manufacturing</b>	4.5%	4.5%	2.5%
<b>Construction</b>	5.0%	5.0%	5.0%
<b>Distribution; transport; accommodation and food</b>	25.0%	15.0%	15.0%
<b>Information and communication</b>	20.0%	20.0%	30.0%
<b>Financial and insurance activities</b>	1.0%	9.0%	1.0%
<b>Real estate activities</b>	0.5%	0.5%	0.5%
<b>Business service activities</b>	28.0%	30.0%	30.0%
<b>Public administration; education; health</b>	12.0%	12.0%	12.0%
<b>Other services and household activities</b>	3.0%	3.0%	3.0%

<sup>4</sup> A measure of the value of goods and services produced within a geographic area and/or economic sector of an economy, calculated as the value of output less the value of intermediate consumption (i.e. raw materials and other inputs).

- 2.9 These assumptions give a different number of jobs per sector depending on total employment scenario (reference case or investment led).

## Employment densities

- 2.10 Homes and Communities Agency (HCA) guidance<sup>5</sup> on observed employment densities for different types of workplace was used to convert employment per sector for each Garden Community into floorspace requirements.
- 2.11 Business register and employment survey (BRES) data was analysed to inform decisions about the assignment of employment in each sector to different types of workspace; for each sector it provides a breakdown by more specific occupational classes, which were approximately assigned to different types of office, industrial, or warehousing space or to non-B class space. In doing this we made sure to accommodate the NEGC ambition for Garden Communities to contain research and development (R&D) space (assumed 20% of business service activities employment) and business incubators (assumed 10% of information and communication employment).
- 2.12 Densities provided in the HCA guidance were all converted into GEA (Gross External Area) measurements for consistency, following HCA rules of thumb for conversions of NIA (Net Internal Area) into GIA (Gross Internal Area) and GIA into GEA.<sup>6</sup>
- 2.13 GEA, GIA, and NIA are defined as follows:<sup>7</sup>
- Gross External Area (GEA) includes walls, plant rooms, and outbuildings, but excludes external space such as balconies and terraces.
  - Gross Internal Area (GIA) refers to the entire area inside the external walls of a building and includes corridors, lifts, plant rooms, service accommodation (e.g. toilets).
  - Net Internal Area (NIA) – this is commonly referred to as the net lettable or ‘usable’ area of offices and retail units. It includes entrance halls, kitchens and cleaners’ cupboards, but excludes corridors, internal walls, stairwells, lifts, WCs and other communal areas.
- 2.14 To give an example, within the particularly varied ‘Distribution; transport; accommodation and food’ sector, we arrived at an average density of 26.2m<sup>2</sup> of B class space per employee. The assignment of employment to different types of workplace was as follows:
- 0.10 to B1c Light Industrial, with a GEA of 52.1m<sup>2</sup>/employee.
  - 0.30 to B8 Final Mile Distribution, with a GEA of 70.0m<sup>2</sup>/employee.
  - 0.60 to non-B class uses.
- 2.15 B class space per employee for each sector is shown in Table 3<sup>8</sup>.

<sup>5</sup> *Employment Density Guide 3<sup>rd</sup> Edition*, Homes & Communities Agency, November 2015, page 29

<sup>6</sup> Conversion of NIA to GIA: HCA says that for non-industrial premises GIA is 15-20% higher than NIA; industrial NIA is 95% of GIA. Conversion of GIA to GEA: assumed that GIA = 0.95\*GEA for all premises, again as per HCA guidance

<sup>7</sup> Definitions based on *Employment Density Guide 3<sup>rd</sup> Edition*, Homes & Communities Agency, November 2015, page 4

<sup>8</sup> Cebr considered employment densities per sector for ‘baseline’ and ‘digital focus’ scenarios. The former did not account for R&D and incubator space requirements, so the digital focus densities are shown here. In the baseline the requirements were 13.6 rather than 16.7 for information and communication and 12.9 rather than 20.1 for business service activities.

Table 3: B class employment space requirements (m<sup>2</sup>/employee) per industrial sector from Cebr work

Industrial sector	B class space per employee
Agriculture, mining, electricity, gas, water and waste	1.5
Manufacturing	46.4
Construction	26.1
Distribution; transport; accommodation and food	26.2
Information and communication	16.7
Financial and insurance activities	13.6
Real estate activities	14.8
Business service activities	20.1
Public administration; education; health	3.0
Other services and household activities	0.0

- 2.16 From the B class space requirements and number of employees per sector it was thus possible to estimate employment space requirements for each Garden Community for key future years.
- 2.17 Estimated floorspace requirements for each Garden Community in 2033, 2050, and on completion of construction ('final state') are summarised in the results section.

### Conversion to employment land requirement

- 2.18 Floorspace requirements were converted into employment land requirements using a plot ratio<sup>9</sup> of 200% for offices (B1a Offices, Mixed B Class in the HCA employment densities table), 40% for industrial (B1b, B1c, B2), and 50% for warehousing (B8). This was based on government guidance<sup>10</sup> and Cebr's discussions with AECOM, who confirmed these were widely-applicable ratios which have been used in other North Essex planning policy work.
- 2.19 Estimated employment land requirements for each Garden Community in 2033, 2050, and on completion of construction ('final state') are summarised in the results section.

<sup>9</sup> A plot ratio defines the employment land requirement relative to the employment floorspace requirement, giving the latter as a percentage of the former. E.g. a 50% plot ratio indicates that employment floorspace requirement is 50% of the land required; 5,000m<sup>2</sup> of floorspace requires 10,000m<sup>2</sup> (1 hectare) of land.

<sup>10</sup> Office of the Deputy Prime Minister, *Employment Land Reviews: Guidance Note* (2004), page 101.

### 3. Summary of Results

- 3.1 Employment, floorspace required, and land required under each scenario and key year are summarised by Garden Community in Table 4.

*Table 4: Summary of employment, floorspace, and land results by employment scenario, Garden Community, and year*

West of Braintree		2033	2050	Final state
Reference case	Employment	2,700	7,800	13,000
	Employment floorspace (sq. m.)	52,666	152,147	253,579
	Employment land (hectares)	9.2	26.5	44.1
Investment led	Employment	2,685	7,671	12,786
	Employment floorspace (sq. m.)	52,380	149,640	249,400
	Employment land (hectares)	9.1	26.0	43.4
Colchester Braintree Borders		2033	2050	Final state
Reference case	Employment	1,350	6,450	24,000
	Employment floorspace (sq. m.)	24,807	118,524	441,020
	Employment land (hectares)	4.0	19.1	71.2
Investment led	Employment	1,343	6,344	23,605
	Employment floorspace (sq. m.)	24,672	116,571	433,753
	Employment land (hectares)	4.0	18.8	70.1
Tendring Colchester Borders		2033	2050	Final state
Reference case	Employment	2,500	7,600	9,000
	Employment floorspace (sq. m.)	45,083	137,053	162,300
	Employment land (hectares)	6.9	21.0	24.9
Investment led	Employment	2,486	7,475	8,852
	Employment floorspace (sq. m.)	44,838	134,795	159,625
	Employment land (hectares)	6.9	20.7	24.5



# **NORTH ESSEX GARDEN COMMUNITIES**

## **INFRASTRUCTURE PLANNING, PHASING AND DELIVERY**

### **FINAL REPORT**

July 2019



# 3.1 Concept Framework

The Tendring Colchester Borders Concept Framework defines a spatial option for the long term delivery of a Garden Community and is framed by the following key principles:

- **Land use, capacity and placemaking** - A landscape led framework provides 7 development parcels each with its own characteristics and each with a particular role to play in the new community as a whole.
- **Employment** - Employment land includes an extension to the University's Knowledge Gateway, and a Business Park adjacent to the A120 with a mix of employment uses supported by Park and Ride, and served by a Mass Rapid Transit network, and employment floorspace within the district and local centres
- **Access and movement** - a key element of the access and movement strategy is the integration of a mass rapid transit system that connects Colchester Town and its stations with the University and with the new Garden Community. A new junction on the A120 will be required to provide a highway link to the A133 and to provide access to the Garden Community. The link road is proposed to form a development edge which will define the eastern extent of the new community which could be designed as a 'Parkland Avenue', with junctions to provide access into core development areas.
- **Open Space**- The landscape framework extends the green landscape of the urban edge of Colchester into the new suburb to provide a strong landscape link that connects existing communities and Salary Brook with the new Garden Community. The Framework emphasises a central 'east-west' orientated corridor between Greenstead, Salary Brook and new Country Park towards the rural eastern edge of the Suburb and on to Elmstead Market to the east. There is also potential to link across the A120 to Ardleigh Reservoir.
- **Phasing and delivery** - An informed position on how the development could be phased and delivered within the site constraints and opportunities, including key infrastructure requirements and delivery commentary.

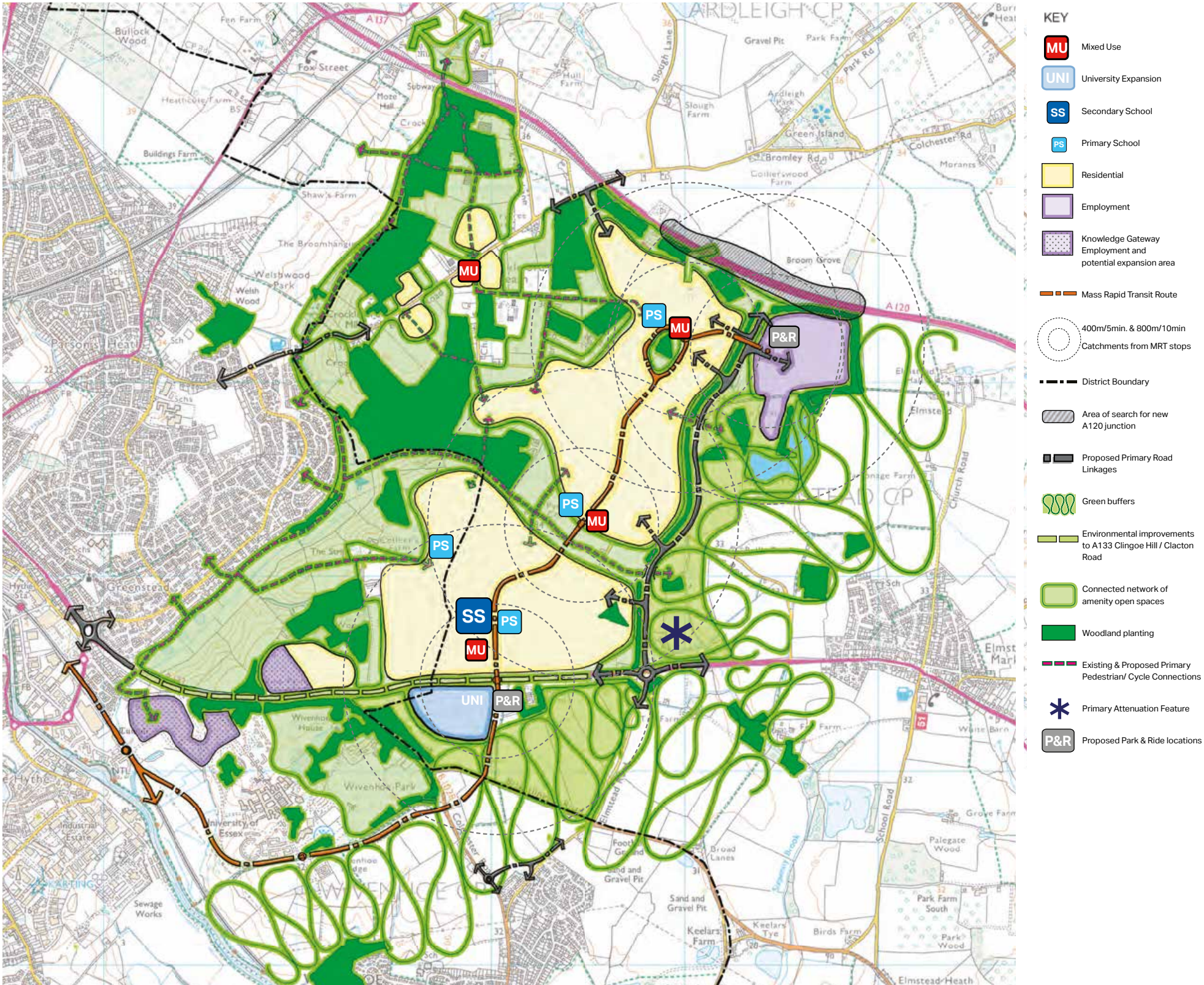


Figure 8: Tendring Colchester Borders Concept Framework. Source: David Lock Associates (2017)  
Page 164 of 274



### 3.2 Indicative masterplan and land use budget

The plan that forms the basis of this current exercise is an iteration of the Tendring Colchester Borders Concept Framework. The modifications shown in this revised plan are minimal and derive from an update to the approach to infrastructure provision and to take account of more detailed work on the need for employment land, outlined by Cebr in their July 2019 report.

The other principal change is the re-calibration of open space, across the site, with a target level of provision that is more in keeping with the standard assumed across all three Garden Community sites.

Table 4: Tendring Colchester Borders Land Use Budget

	Area	Dwellings
Residential (ha)	196.06	
Dwellings in Residential		6,960
Mixed Use (ha)	9.00	
Dwellings in Mixed Use		540
Primary School (ha)	15.00	
Secondary School (ha)	10.00	
Employment (ha)	24.50	
Park and Ride	3.67	
Open Space (ha)	144.73	
Infrastructure (5%)	21.21	
Total	424.17 Ha	7,500

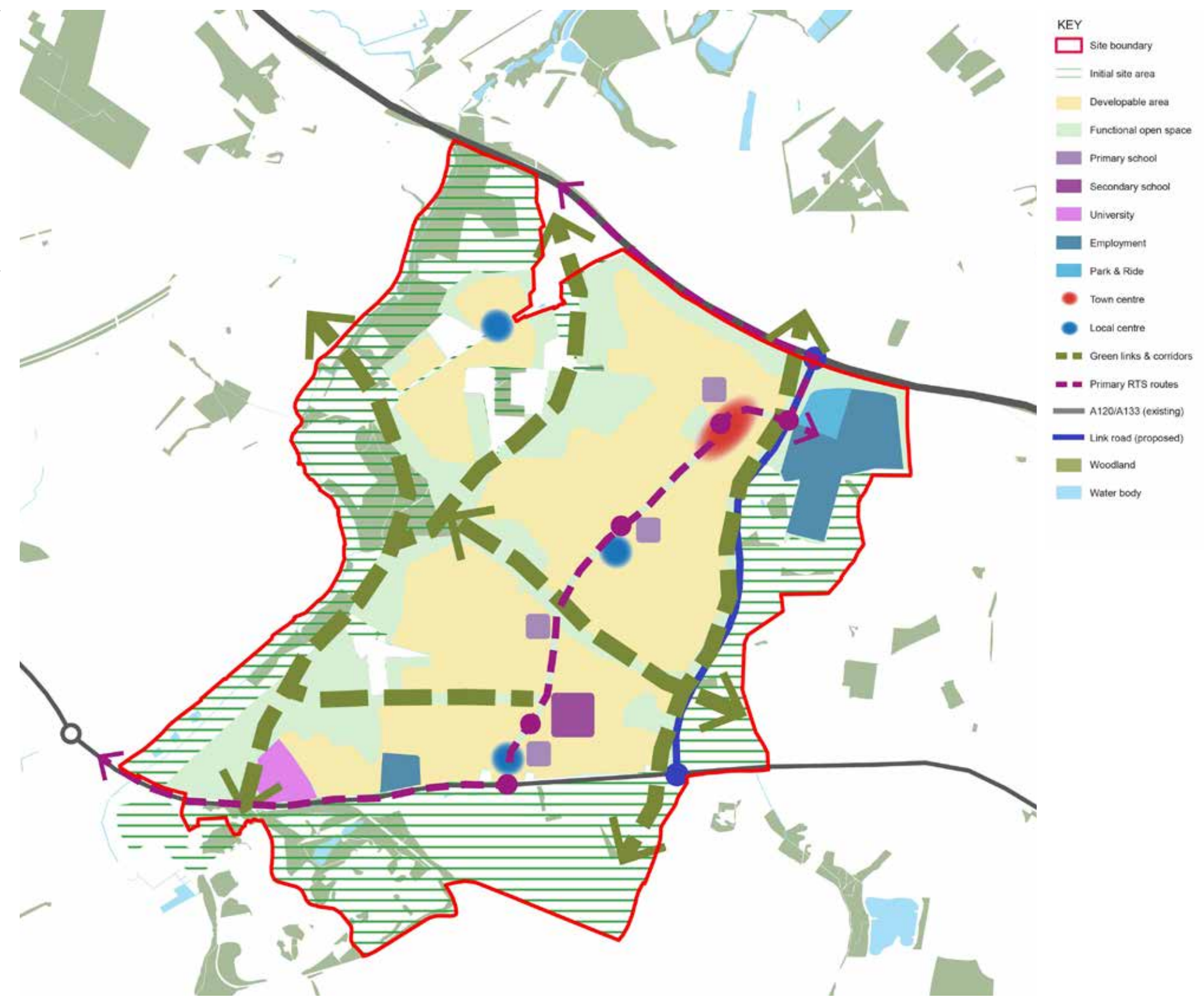


Figure 9: Tendring Colchester Borders Indicative masterplan (derived from Concept Framework)  
Page 165 of 274

## 3.3 Movement and connectivity baseline

Whilst Phase 1 is well located to access the local road and bus networks, access for active modes will require enhancing. Some existing junctions will also require improvements in order to mitigate the impact of development, unless the A133 – A120 link road is delivered in parallel with Phase 1.

### Key Findings - Roads



#### Current Situation

- The site is located on the eastern fringe of Colchester between the A133 to the south and the A120 to the north providing opportunities for connection with the A120 trunk road.
- Bromley Road and Harwich Road both pass through the site providing connections onto the A137 for links to and from Colchester town centre.
- In addition, numerous roads (predominantly rural roads) run through the site, providing wider vehicular access to the area.

#### Future and Wider Issues

- The development of the Tendring Colchester Borders site will require direct connections to the A120 and A133 which could be delivered phased with development in the form of new junctions.
- A number of existing junctions and links surrounding the site operate near to or at capacity during the peak periods. Improvements will therefore need to be brought forwards to these links and junctions in tandem with sustainable connections to minimise the impacts on the existing highway network.

### Key Findings - Public Transport



#### Current Situation

- Local bus routes operate within the vicinity of the site at a relative high frequency, whilst more strategic bus routes provide low frequency inter-urban connections.
- The closest rail station to the site is Hythe station, located approximately 2.3km southwest of the centre of the site but only 800m from the southern boundary. It offers services on the Sunshine Coast line (GEML branch) providing up to two trains per hour between London and Clacton-on-Sea, and another train per hour in either direction between London and Walton-on-the-Naze. Both services connect with Colchester Mainline Station from where connections on the wider GEML are achievable with up to 10 services per hour to London.

#### Future and Wider Issues

- The potential for greater public transport connectivity has been identified in the concept framework and further explored by Jacobs' North Essex Rapid Transit study suggesting main corridors of movements between the 3 North Essex sites and their main local employment centres such as in the Tendring District and Colchester.

### Key Findings - Active Modes



#### Current Situation

- Existing provision for active modes (walking and cycling network) is very limited on site. However, PROWs exist across the site in various locations.
- Other dedicated walking and cycling corridors are located close to the site such as the NCN 51 (long-distance cycle route) and Colchester cycle network running along the western edge of the site.
- Bromley Road allows movements across the A120 for cyclists and pedestrians, reducing the severance effect of this road and good pedestrian footway links are in place on the A133 linking the University site and west towards the town centre.
- The nature of the roads that cross the site mean pedestrian footway connections are limited; in many cases to one side of the carriageway or not present at all in the case of the rural roads.

#### Future and Wider Issues

- Building on the garden communities principles, Tendring Colchester Borders has the potential to plan for an important number of internalised movements to be undertaken by walk or cycle thanks to high-quality and dedicated infrastructure on-site.
- For wider hinterland/commuting movements, significant improvements would be required to increase the quality of the existing infrastructure and encourage cycling as an alternative to the car towards Tendring in particular.



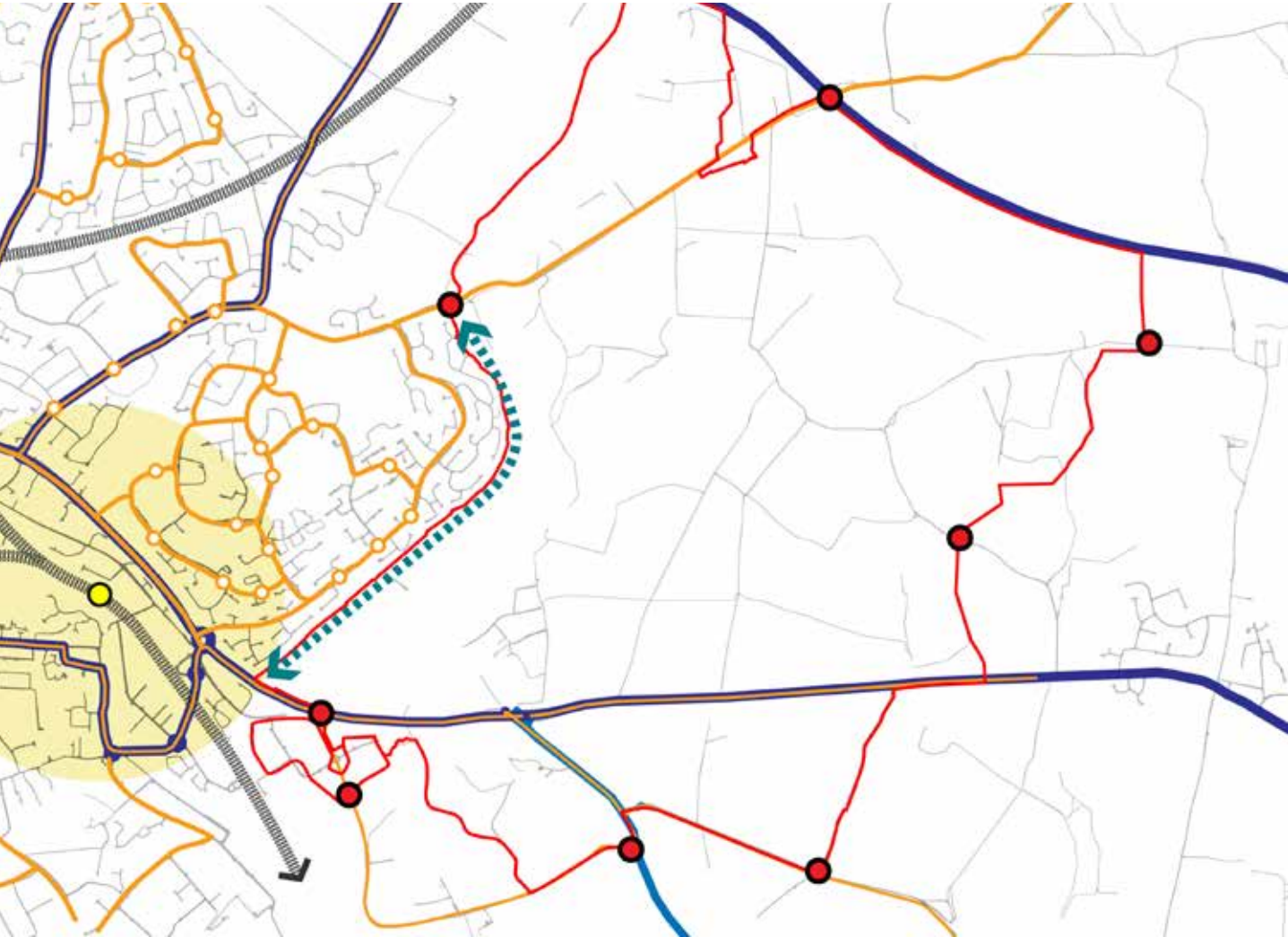


Figure 10: Tendring Colchester Borders Movement and connectivity baseline. AECOM.

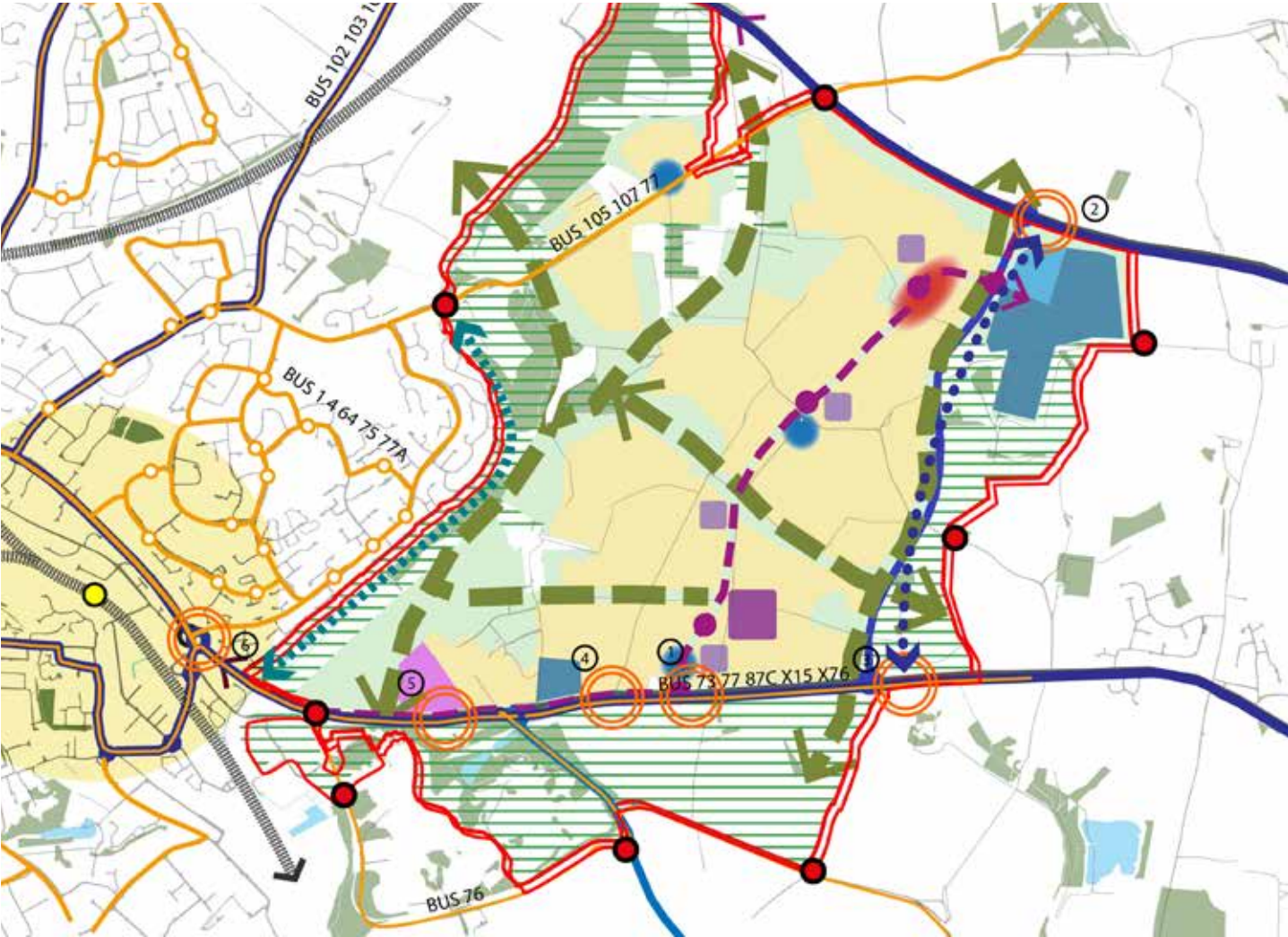
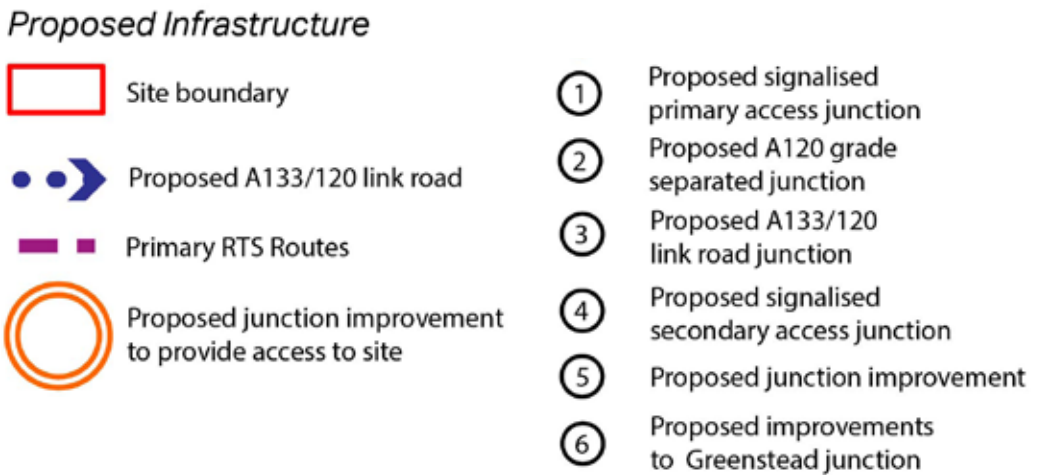
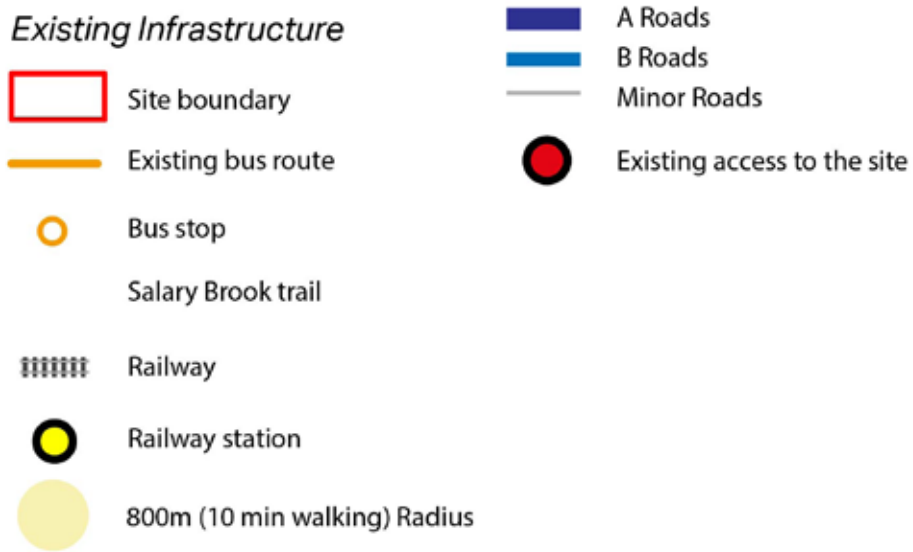


Figure 11: Tendring Colchester Borders Movement and connectivity potential interventions. AECOM.



# 3.4 Utilities baseline

This section provides a high level analysis of utilities based on preliminary conversations with service providers and desk-based study. Further discussions will be required as masterplans are worked up and more detail emerges.

## Key Findings - Electricity



### Current Situation

- A meeting was held with UKPN to discuss issues relating to capacity of power available in the four areas under consideration. These informal meetings are referred to as “surgeries” by UKPN and are designed to offer some headline advice ahead of any formal engagement.
- UKPN advised that they expect a capacity demand somewhere between 5MW and 10 MW would trigger the need for a new primary substation.
- There is some good information in the evidence base for this area. General information is provided in the UKPN Regional Development Plan (RDP), and this is amplified through a meeting with UKPN in September 2014. Some network reinforcement will be needed in the period to 2031 to ensure that the Regulated reliability criteria are maintained under winter loading conditions.

### Future and Wider Issues

- Development east of the Salary Brook could be supported by upgrading Colchester Primary substation, but distribution may be more costly owing to the need to install new circuits under the river but other supply options could be made available to the area, subject to further study. Specifically, the substation at Lawford could be upgraded which would avoid the river crossing.

## Key Findings - Waste Water



### Current Situation

- The Colchester Waste Water Treatment Plant, now referred to Water Recycling Centre (WRC), is near capacity. There is a high level strategy to expand the plant, but expenditure will only be committed in response to developer demand. Expansion will have a fairly long lead-in time, so there may be some constraint on early development.
- There are a number of small WRC’s with some capacity in this area. These include WRC’s at Fingringhoe and Great Bromley. These could serve early development, but before the end of the plan period (2033), waste water would have to be pumped to Colchester WRC at Hythe, or a new treatment plant would have to be built. Pumping to Hythe would involve a river crossing.

### Future and Wider Issues

- Most sewers are running with limited spare capacity, and infrastructure upgrades will be needed to support new development. This offers the opportunity to explore new approaches.
- Development in North Colchester may trigger the need for a new WRC within this region also; there could be an opportunity to install a WRC with sufficient capacity to serve both sites, benefiting from economies of scale and providing a more sustainable water cycle.

## Key Findings - Gas



### Current Situation

- According to an email from National Grid Gas in September 2014, the high and medium pressure network is expected to be able to deliver the predicted additional demand from new development, but the low pressure network will require reinforcement where connections to new development are required.

### Future and Wider Issues

- A new pipeline connecting the existing Medium Pressure main to a new pressure reducing station will be required.

## Key Findings - Telecommunications



### Current Situation

- Evidence limited with additional investigation under masterplanning required.

### Future and Wider Issues

- Telecommunication network will be made available to the development at no cost, following a commitment by BT Openreach to serve all developments of more the 30 homes with high speed broadband.

## Key Findings - Water Supply



### Current Situation

- There is some general information in the Anglian Water development plan covering the period 2015 to 2020. The region east of Colchester (referred to in the Anglian Water development plan as “South Essex”) is predicted to be in water deficit condition by 2030.

### Future and Wider Issues

- Water will need to be delivered from other areas within the Anglian Water region, or supplemented by neighbouring water companies, namely Affinity Water to the south and Severn Trent to the west. The Anglian water predictions are based on average growth trends; any accelerated growth will bring the date forward. There is no specific information about the proposed development area. There are no major supply projects planned during the current review period (to 2020) – the focus is firmly on demand reduction by tackling leakage and installing water meters.
- The Ardleigh Reservoir, located to the north of the site, could provide additional supply, however this is subject to agreement with the relevant stakeholders. It would also require upgrades to existing as well as new infrastructure.



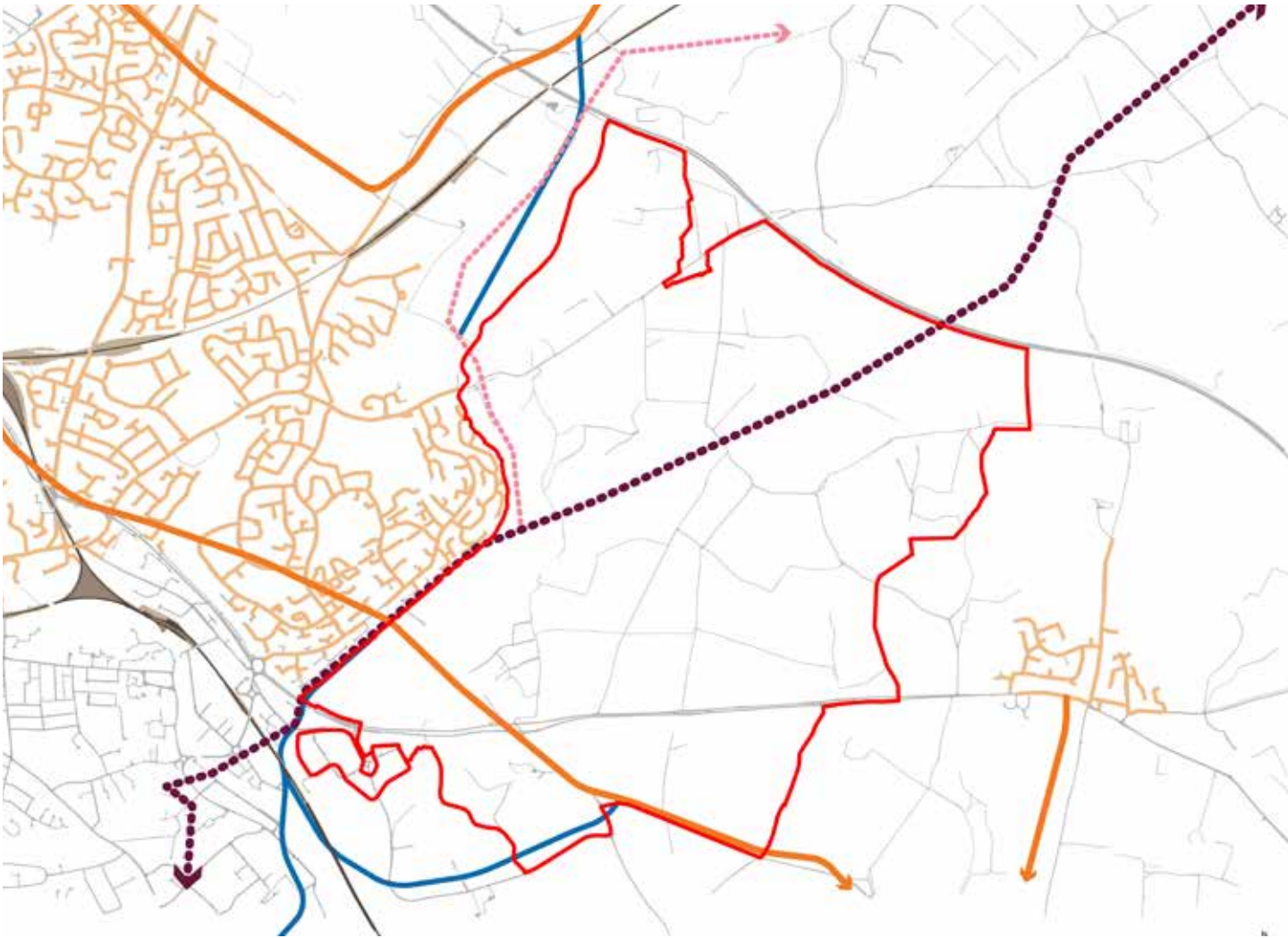


Figure 12: Tendring Colchester Borders Utilities baseline. AECOM.



Figure 13: Tendring Colchester Borders Utility interventions. AECOM.

- High pressure Gas
- Medium Pressure Gas Pipe
- 33,000 V Tower Line
- 132,000 V Tower Line

- High pressure Gas
- Medium Pressure Gas Pipe
- 33,000 V Tower Line
- 132,000 V Tower Line
- Medium pressure gas supply
- Sewage treatment
- Primary substation supply

# 3.5 Infrastructure requirements by phase

## Project List

Infrastructure delivery forms a key element of the Garden Community principles. Table 5 contains the estimated infrastructure required to support development at Tendring Colchester Borders and the figures below show phasing assumptions spatially. Please note the infrastructure highlighted is indicative and not based on a detailed masterplanning exercise.

In accordance with the Garden Community approach, the programme assumes the front-loading of several infrastructure items so that they are provided before the benchmarked trigger point.

Table 5: Tendring Colchester Borders Infrastructure requirements

				Cumulative Development Schedule					
Infrastructure	Demand arising from development	Unit of demand	Commentary/assumptions	Phase 1 1,442	Phase 2 3,004	Phase 3 4,556	Phase 4 5,783	Phase 5 6,848	Phase 6 7,500
Education									
Primary Schools: 2 Form Entry (including 56 place EY+C facility)	8	FE	2FE facilities and EY + C Assuming 210 places per FE and 56 places per EY. Excludes temporary accommodation.	2FE + EY	2FE + EY	2FE + EY		2FE + EY	
Secondary Schools	8	FE	Assuming 150 places per FE. Excludes temporary accommodation.		8FE				
Standalone Early Year Facilities (56 place, above those co-located with Primary)	5	Facilities	Assuming 56 places per facility. 4 EY facilities within primary schools, 9 in total required by development. Excludes temporary accommodation.	1	1		2		1
Healthcare & Community									
General Practitioners	1,650	m²	Demand arising 10 GPs. Assuming 1800 population per GP. Assuming a population of 18,000 (2.4/unit). Assuming 165 m² / GP.	2	2	2	1	2	1
Dentists	550	m²	Demand arising 11 Dentists. Assuming 1760 population per dentist. Assuming a population of 18,000 (2.4/unit). Assuming 50 m² / Dentist.	3	2	1	2	2	1
Community Space and Libraries	1,800	m²	Demand arising 540 m² of Library Space. Assuming 30 m² per 1000 persons. Demand arising 1080m² of Community Space. Assuming 60 m² per 1000 persons. Demand arising 1nr 1800 m² facilities. Assuming a population of 18,000 (2.4/ unit).	19%	21%	21%	16%	14%	9%
4 Court Sports Centre	952	m²	Demand arising 2 nr facilities. Assuming 0.072 facilities per 1000 persons. Assuming 476m² per facility. Assuming a population of 18,000 (2.4/unit).	1			1		
4 Lane Swimming Pool	245	m²	Demand arising 1 nr facility. Assuming 0.048 facilities per 1000 persons. Assuming 245m² per facility.. Assuming a population of 18,000 (2.4/unit).	1					
Open Space									
Open space	144	ha	Assuming a population of 18,000 (2.4/unit). Including; 8ha total open space per 1000 population.	38.88	47.52	1.44	28.80	20.16	7.20
Environment/waste - Allowance	7,500	units	Include allowance per unit to cover the provision of acoustic bunding / fencing to mitigate the impact of external sources of noise such as highways and public transport and localised solid waste recycling area.	1442	1562	1552	1227	1065	652

Cumulative Development Schedule																
Infrastructure	Demand arising from development	Unit of demand	Commentary/assumptions	Phase 1 1,442	Phase 2 3,004	Phase 3 4,556	Phase 4 5,783	Phase 5 6,848	Phase 6 7,500							
Utilities - Scheme-Wide Enabling Works																
Site Preparations and Earthworks			Assume Site Area of 403ha plus an allowance for an additional 10% of this area to allow for works outside of the core development area and within the site boundary.	19%	21%	21%	16%	14%	9%							
General demolition and site clearance 443 ha = m²	4,430,000	m²														
Strategic Earthworks; cut and fill																
Highways																
Primary and secondary road network																
Drainage																
Foul and surface water network																
Landscaping																
Cost captured in open space																
Noise attenuation																
Cost captured in open space																
Waste Management																
Provision for recycling on site, excluding new amenitys	7,500	Nr														
Energy																
33 No. 11 kV to 400 V distribution substations	33	Substations														
7 No. 11 kV ring circuits from primary substation to connect to distribution substations.	7	Ring Circuits														
400 V LV circuits from distribution substations to end users	7,500	Circuits/Unit														
Residential Electricity Connections																
Budget cost per Low Voltage (LV) Service Disconnection		Unit														
Potable water																
New network of distribution pipework																
Water mains, connections and infrastructure charges																
Waste Water																
New network of collection pipework																
Plot connections for all properties to waste water distribution network																
Gas																
Low Pressure Residential Connections																
Utilities - Off-Site Requirements																
Electricity																
132 kV connection to Primary Substation from Colchester Grid Substation					100%											
Electricity Diversion Works				100%												

Cumulative Development Schedule									
Infrastructure	Demand arising from development	Unit of demand	Commentary/assumptions	Phase 1 1,442	Phase 2 3,004	Phase 3 4,556	Phase 4 5,783	Phase 5 6,848	Phase 6 7,500
Potable Water									
Connection to closest feasible supply source with capacity (e.g. trunk main or reservoir)				100%					
Budget cost per lowering of the Affinity Water 12" AC Distribution Water Main to accommodate a site entrance.			Assuming lowering of the distribution water main to accommodate site entrances within Brightlingsea Road, Elmstead Road and Colchester Road.	100%					
Waste Water / Foul Water									
Upgrades to water course discharges			Allowance for environmental enhancement / EA regulations. Note: Does not account for university student population.	100%					
Connection to existing waste water treatment works via new pumping station - primary and secondary collection networks			Pumped to Colchester WRC (5.2 km pipeline). Note: Does not account for university student population.	100%					
Gas									
Extension to Medium Pressure network				100%					
1 No. Medium to Low Pressure reducing station	Station	% of total provision		19%	21%	21%	16%	14%	9%
Re-routing of 12" Medium Pressure Gas Main through the new on-site road network				100%					
Telecommunications									
Development of access chambers for BT Telecoms network, BT Openreach fibre optic network and private telecoms network throughout development.				19%	21%	21%	16%	14%	9%
Openreach diversion works associated with Mount Pleasant and Allen's Farm off Tye Road.				100%					
Openreach diversion works associated with highway works on the A133.				100%					
Transport									
New signalised access onto A133 (primary access to site)		% of total provision		100%					
Secondary signalised access onto A133		% of total provision		100%					
Interim highways improvements measures (including improvements to Greenstead roundabout and A133 Hare Green roundabout)		% of total provision		100%					
A120-A133 Link Road		% of total provision			100%				
On site RTS route and related improvements/facilities		% of total provision		20%	20%	20%	20%	20%	
Contribution to provisions of off site RTS network		% of total provision		27%	30%	14%	14%	15%	
Park & Ride facilities and interchange with RTS		% of total provision		50%		50%			
Upgrade existing walking / cycling infrastructure		% of total provision		50%	50%				
Various combined segregated pedestrian / cycle "Greenways" through site		% of total provision		19%	21%	21%	16%	14%	9%
Internal road network		% of total provision	Include in enabling costs						



Cumulative Development Schedule									
Infrastructure	Demand arising from development	Unit of demand	Commentary/assumptions	Phase 1 1,442	Phase 2 3,004	Phase 3 4,556	Phase 4 5,783	Phase 5 6,848	Phase 6 7,500
Per Unit Contributions									
Investment in early phase bus/transit services		% of total provision		19%	21%	21%	16%	14%	9%
Travel plan measures (smarter choices, car clubs, charging points, etc) - Straight Line Cost Over Time		% of total provision	Aligned to Modal Shift analysis (ITP). Delivered from day one with funding annually.	19%	21%	21%	16%	14%	9%
Open Space Endowment		% of total provision		19%	21%	21%	16%	14%	9%
Employment Space		% of total provision		19%	21%	21%	16%	14%	9%



**This Section sets out key assumptions and infrastructure and phasing strategies to enable delivery at Colchester Braintree Borders.**

# 04 Colchester Braintree Borders

- 4.1 Concept Framework**
- 4.2 Indicative masterplan and land use budget**
- 4.3 Movement and connectivity baseline**
- 4.4 Utilities baseline**
- 4.5 Total infrastructure requirements by phase**

## 4.1 Concept Framework

The Colchester Braintree Borders Concept Framework defines a spatial option for the long term delivery of a Garden Community.

The framing principles are similar as for the other Garden Communities, promoting a landscape-led vision, a high level of economic self-sufficiency and a strong emphasis on public transport other sustainable modes.

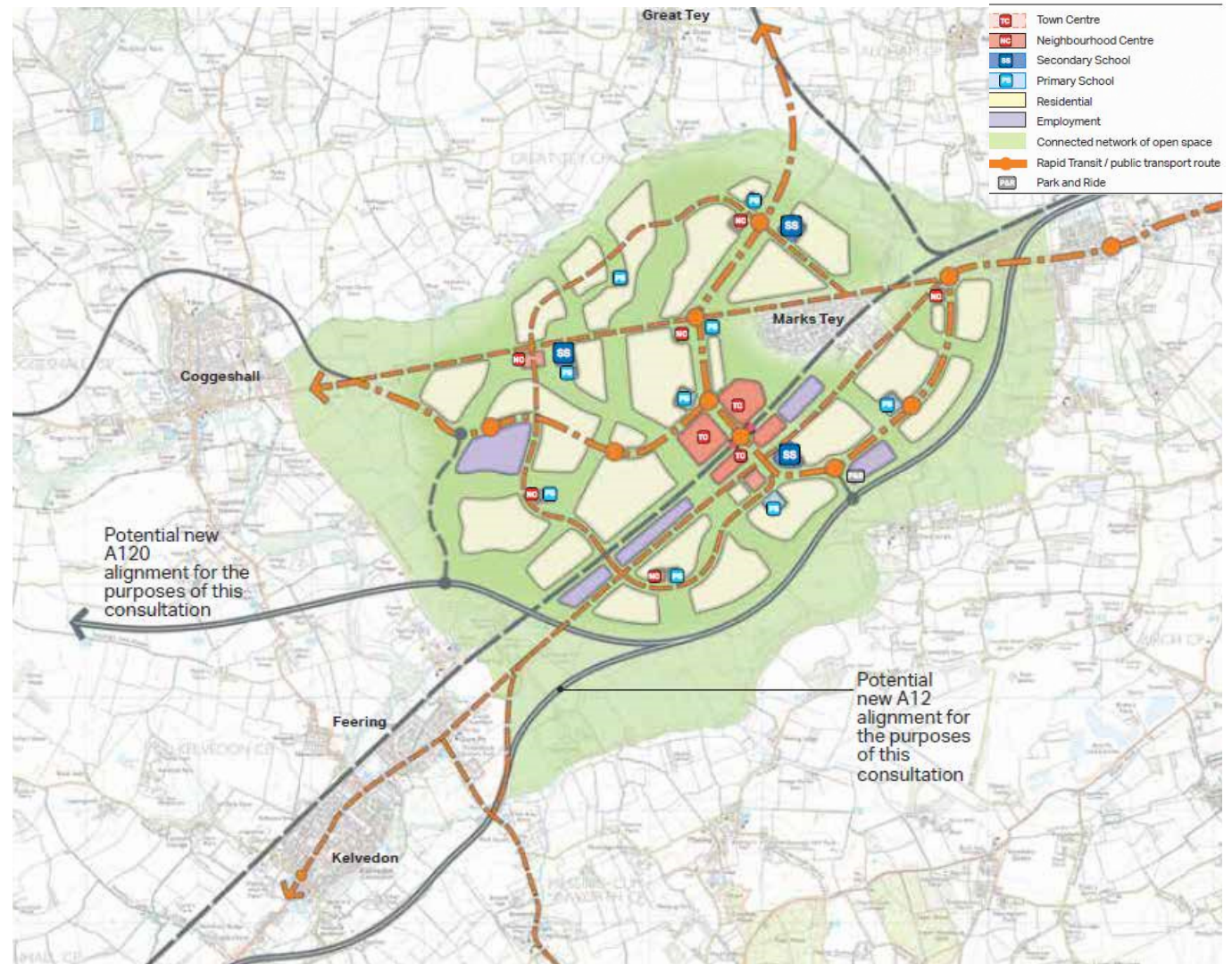


Figure 14: Colchester Braintree Borders Concept Framework (Source: DLA 2017)

## 4.2 Indicative masterplan and land use budget

The plan that forms the basis of this current exercise is an iteration of the Colchester Braintree Borders Concept Framework and takes account of more detailed work on the need for employment land, outlined by Cebr in their July 2019 report.

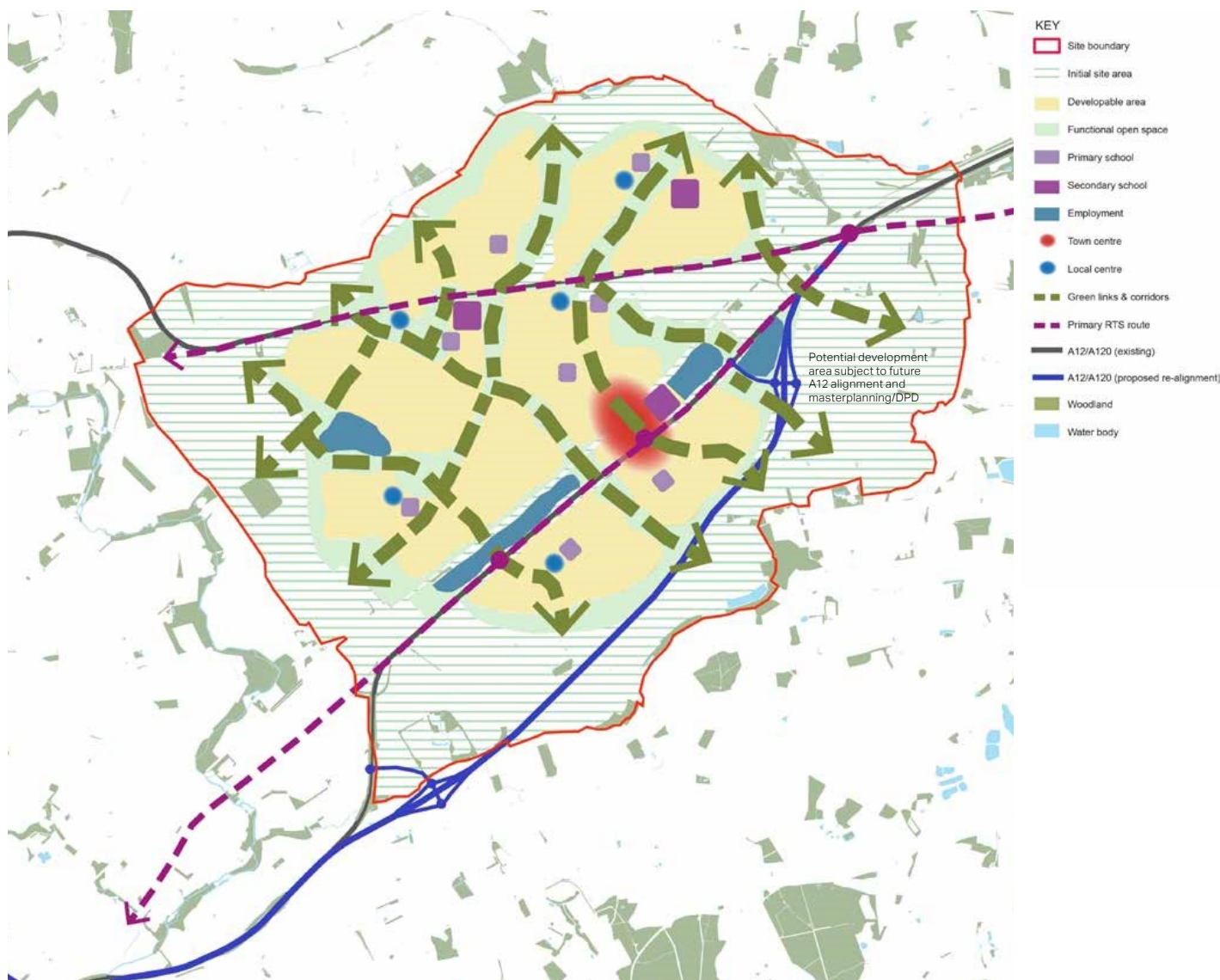
Instead of relocating Marks Tey train station, the analysis in this report assumes that it stays in situ but is linked from the outset by a high quality rapid transit network.

The other principal change is the re-alignment of the A12. This has the effect of removing land that was previously considered for development. There is potential to develop land east of a new junction, subject to A12 realignment and it being considered suitable to form part of the Garden Community and being considered by future masterplanning to inform the Development Plan Document.

Another key change from the original Concept Framework plan is the re-calibration of open space, across the site, with a target level of provision that is more in keeping with the standard assumed across all three Garden Community sites.

**Table 7: Colchester Braintree Borders Land Use Budget**

	Area	Dwellings
Residential (ha)	563.73	
Dwellings in Residential		19,730
Mixed Use (ha)	20.00	
Dwellings in Mixed Use		1,200
Primary School (ha)	24.00	
Secondary School (ha)	30.00	
Employment (ha)	51.70	
Open Space (ha)	421.56	
Infrastructure (5%)	58.47	
<b>Total</b>	<b>1,169.46 Ha</b>	<b>20,930</b>



**Figure 15: Colchester Braintree Borders Indicative Masterplan (derived from Concept Framework)**

## 4.3 Movement and connectivity baseline

The development site is well connected to the Strategic Road Network with the A12 and A120 passing through the site, however careful consideration should be given to their proposed realignments and the benefits this could bring to delivering access to the site.

### Key Findings - Roads



#### Current Situation

- The site extends southwest from the A12 / A120 interchange (Junction 25). The A12 runs parallel to the southeast boundary and the A120 is an east-west link passing through the northern section of the site. Both the A12 and A120 currently experience high levels of peak period congestion.
- There are a number of small access roads into the site from the main trunk roads. These roads (predominantly rural roads) run through the site, providing wider vehicular access to the area.

#### Future and Wider Issues

- Highways England has proposed to upgrade the A12 between Junction 19 (Chelmsford) and Junction 25 (A120 Interchange). The upgrade in the vicinity of the site is proposed as an off-line widening scheme.
- Essex County Council are also proposing the realignment of the A120 of which a preferred route has been identified linking Galleys Corner in Braintree with the A12 south of Kelvedon, with the existing A120 proposed to be downgraded.
- Improving access to the site from the A12 and A120 would be a requirement of delivery of this site.

### Key Findings - Public Transport



#### Current Situation

- The existing bus routes run along the A12 and A120 with a number of bus stops serving Marks Tey with connections between Chelmsford and Colchester.
- Marks Tey train station lies in the northeast corner of the site and sits on the Great Eastern Main Line serving stations up to every 20 minutes between London and Colchester during the peak periods.

#### Future and Wider Issues

- The potential for greater public transport connectivity has been identified in the concept framework and further explored by Jacobs' North Essex Rapid Transit study suggesting main corridors of movements between the 3 North Essex sites and their main local employment centres such as Stanstead and Chelmsford.
- The realignment of the A12 and A120 provides opportunities for improved local access and reallocation of road space for sustainable modes.

### Key Findings - Active Modes



#### Current Situation

- Existing provision for active modes (walking and cycling network) is constrained to main road corridors limiting connectivity. There are some PROWs that exist across the site in various locations, including Essex Way which runs across the northern section of the site.
- There are no National Cycle Network (NCN) routes of note in close proximity to the site.

#### Future and Wider Issues

- Building on the garden communities principles, Colchester Braintree Borders has the potential to plan for an important number of internalised movements to be undertaken by walk or cycle thanks to high-quality and dedicated infrastructure on-site.
- For wider hinterland/commuting movements, significant improvements would be required to increase the quality of the existing infrastructure and encourage cycling and public transport as an alternative to the car towards Colchester in particular.



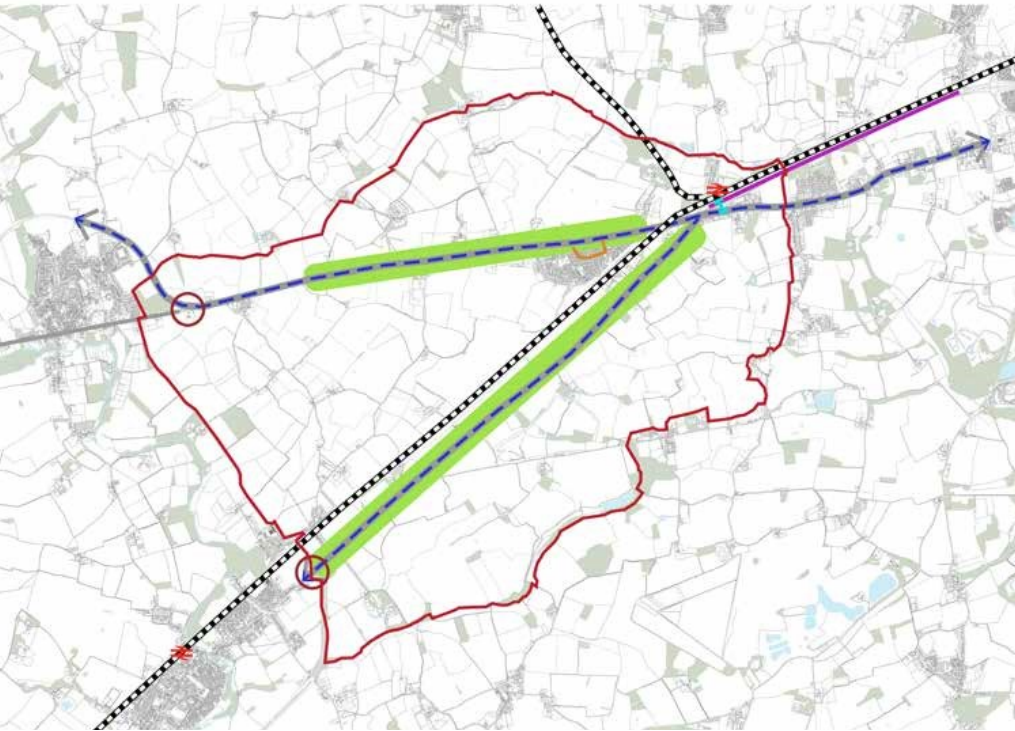


Figure 16: Colchester Braintree Borders Movement and connectivity baseline. AECOM.

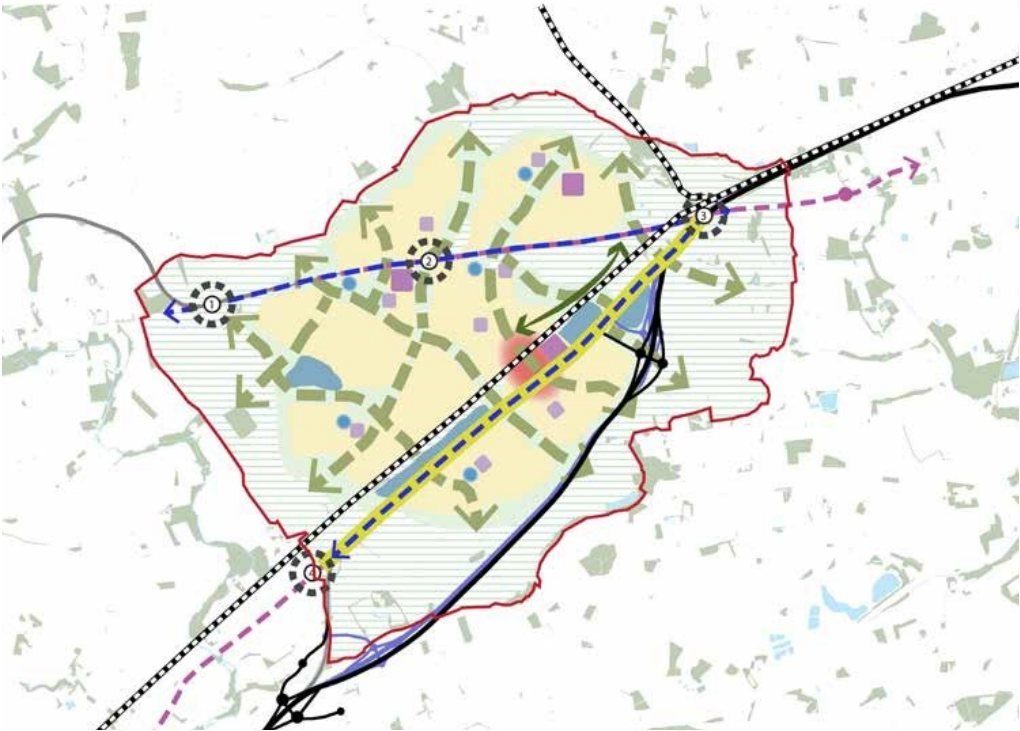


Figure 17: Colchester Braintree Borders Movement and connectivity potential interventions. AECOM.

- Existing Infrastructure*
- Site boundary
  - Railway
  - A Road
  - B Road
  - Strategic bus route
  - Local bus route
  - Junction identified over capacity by 20 32 (Local Plan Jacobs Modelling)
  - Identified key bottle neck
  - Pedestrian bridge
  - Road >100% stress

- Proposed Infrastructure*
- Site boundary
  - Railway
  - Road to be downgraded
  - Public transport corridor
  - Primary RTS routes
  - Proposed A12
- Junction improvements:
- 1 A120/B1024
  - 2 Site accesses
  - 3 Marks Tey interchange junction
  - 4 A120/Keivedon Road
  - 5 A120/A131/Coggershall Road (Brainti shown)
- A120 proposed road connection
  - Walking and cycling improvements



## 4.4 Utilities baseline

This section provides a high level analysis of utilities based on preliminary conversations with service providers and desk-based study. Further discussions will be required as masterplans are worked up and more detail emerges.

### Key Findings - Electricity



#### Current Situation

- According to UKPN there is some spare capacity in the local electrical network. The new substation at Witham has sufficient capacity to support the early phases of development.

#### Future and Wider Issues

- Approximately 10,000 new homes would trigger the need for a new primary substation, and new distribution infrastructure would be required for any level of development

### Key Findings - Waste Water



#### Current Situation

- The development area falls within the Copford water recycling centre (WRC).

#### Future and Wider Issues

- Anglian Water has advised that the high level strategy is to minimise capacity at this WRC. There is no surrounding land available to upgrade this WRC to increase its capacity to meet the additional demand resulting from significant development. Upgrades to the Colchester WRC are viable, and would provide sufficient capacity for the development.

### Key Findings - Telecommunications



#### Current Situation

- Openreach, Virgin Media, Vodafone and Interoute have confirmed assets adjacent to A12 London Road.

#### Future and Wider Issues

- Protection and diversion works may be required for these assets if new highway connections are to be made to the A12 or B1408.
- Telecommunication network will be made available to the development at no cost, following a commitment by BT Openreach to serve all developments of more the 30 homes with high speed broadband.

### Key Findings - Water Supply



#### Current Situation

- Anglian Water is the supplier of fresh water to the area, as part of their South Essex Resource Zone. The main sources of supply are groundwater abstraction and surface water from the River Colne being pumped to storage at the Ardleigh reservoir.

#### Future and Wider Issues

- The local area is expected to fall into a supply deficit by 2040, without accounting for the extra demand resulting from development at CBB. A number of options are being assessed, which in conjunction with demand reduction and water efficiency measures could provide sufficient additional capacity to supply the proposed development.

### Key Findings - Gas



#### Current Situation

- There is a medium pressure (MP) main that runs along the southern carriageway of the A12, and a low pressure (LP) main that runs along the B1408 London Road.

#### Future and Wider Issues

- National Grid Gas advised in September 2014 that the medium pressure network is expected to be able to deliver the predicted additional demand from new development, but the low pressure network will require reinforcement in places.
- Unlike the other two Garden Communities, Colchester Braintree Borders does not require a new pressure reducing station.

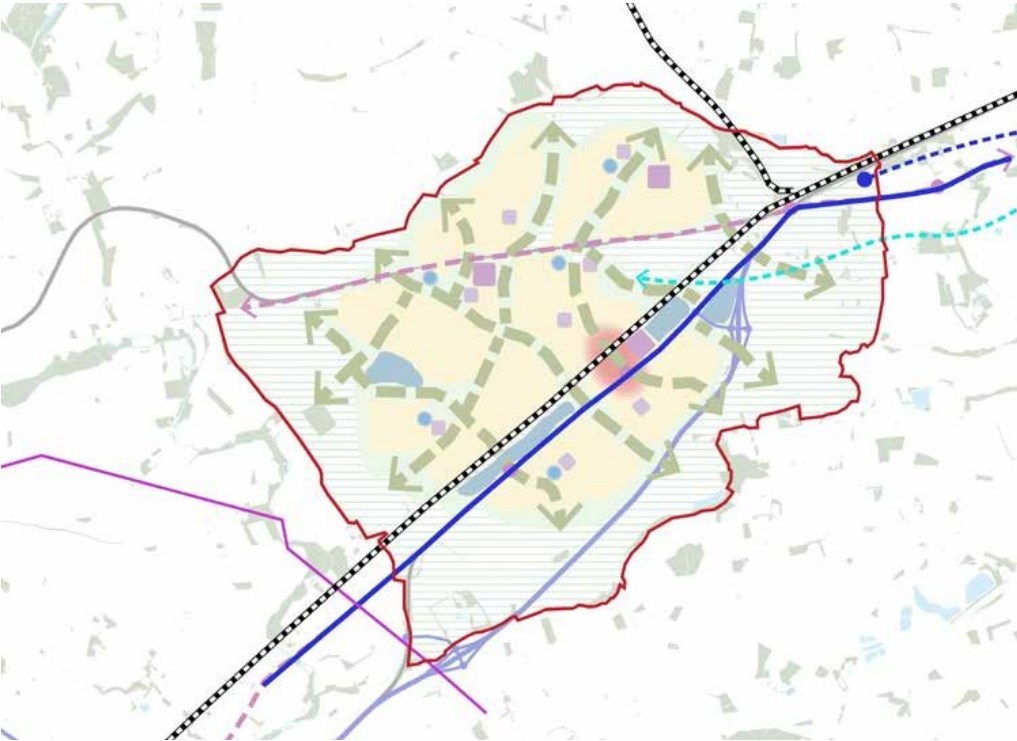
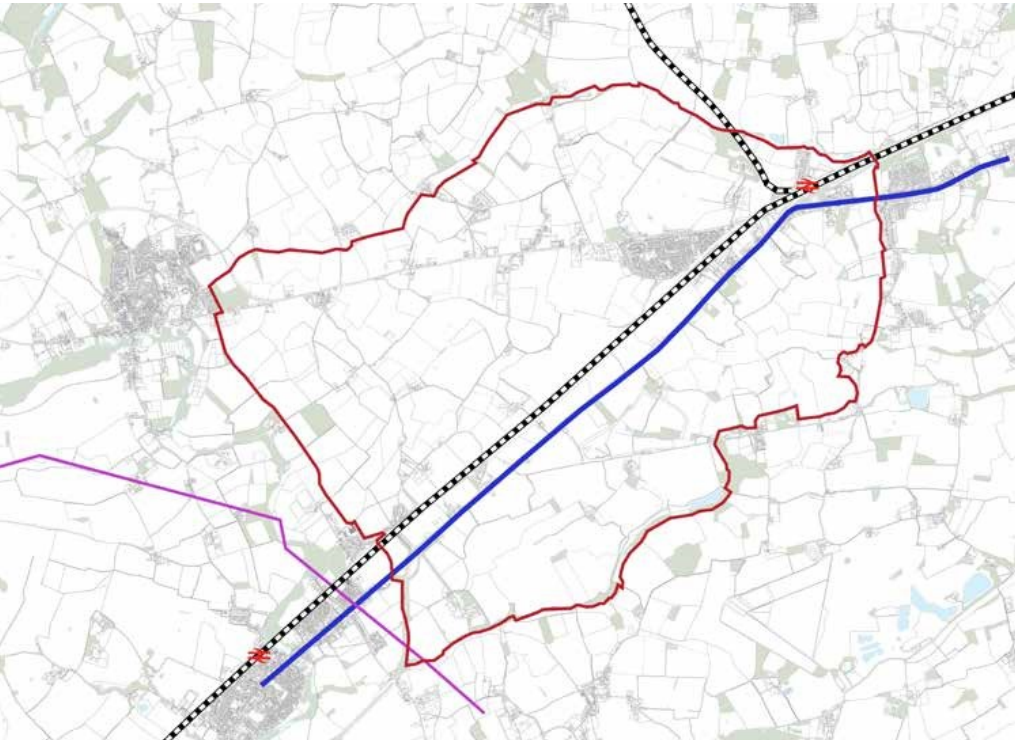


Figure 18: Colchester Braintree Borders Utilities baseline. AECOM.

Figure 19: Colchester Braintree Borders Utility interventions. AECOM.

Existing infrastructure

- Site boundary
- Railway
- 33,000 V Tower Line
- Medium pressure gas pipe

Proposed infrastructure

- Site boundary
- 132/11 kV Primary Substation
- 12km 132kV overhead line connection to Colchester
- New pipeline to existing Water Recycling Centre

## 4.5 Infrastructure requirements by Phase

### Project List

Infrastructure delivery forms a key element of the Garden Community principles. Table 8 contains the estimated infrastructure required to support development at Colchester Braintree Borders and the figures below show phasing assumptions spatially. Please note the infrastructure highlighted is indicative and not based on a detailed masterplanning exercise.

In accordance with the Garden Community approach, the programme assumes the front-loading of several infrastructure items so that they are provided before the benchmarked trigger point.

**Table 8: Colchester Braintree Borders Infrastructure requirements**

Cumulative Development Schedule											
Infrastructure	Demand arising from development	Unit of demand	Commentary/assumptions	Phase 1 2,550	Phase 2 4,608	Phase 3 7,314	Phase 4 9,812	Phase 5 12,582	Phase 6 15,531	Phase 7 18,560	Phase 8 21,000
Education											
Primary Schools: 2 Form Entry (including 56 place EY+C facility)	22	FE	2FE facilities and EY + C Assuming 210 places per FE and 56 places per EY. Excludes temporary accommodation.	2nr 2FE +EY	2FE + EY	2nr 2FE +EY	2FE + EY	2nr 2FE +EY	2nr 2FE +EY	2FE + EY	
Secondary Schools	20	FE	Assuming 150 places per FE. Excludes temporary accommodation.	8FE		6FE			6FE		
Standalone Early Year Facilities (56 place, above those co-located with Primary)	14	Facility	Assuming 56 places per facility. 11 EY facilities within primary schools, 25 in total required by development. Excludes temporary accommodation.	2	2	1	3	1	3	2	
Healthcare & Community											
General Practitioners	4,620	GPs	Demand arising 28 GPs. Assuming 1800 population per GP. Assuming a population of 50,400 (2.4/unit). Assuming 165 m² / GP.	4	4	4	4	4	4	3	1
Dentists	1,450	Dentists	Demand arising 29 Dentists. Assuming 1760 population per dentist. Assuming a population of 50,400 (2.4/unit). Assuming 50 m² / Dentist.	4	4	4	4	4	4	3	2
Community Space and Libraries	5,400	m²	Demand arising 1512 m² of Library Space. Assuming 30 m² per 1000 persons. Demand arising 3024m² of Community Space. Assuming 60 m² per 1000 persons. Demand arising 3nr 1800 m² facilities. Assuming a population of 50,400 (2.4/unit).	12%	10%	13%	12%	13%	14%	14%	12%
4 Court Sports Centre	1,904	m²	Demand arising 4 nr facilities. Assuming 0.072 facilities per 1000 persons. Assuming 476m² per facility. Assuming a population of 50,400 (2.4/unit).	1		1		1	1		
4 Lane Swimming Pool	735	m²	Demand arising 3 nr facilities. Assuming 0.048 facilities per 1000 persons. Assuming 245m² per facility.. Assuming a population of 50,400 (2.4/unit).	1		1			1		
Open Space											
Open space	403	ha	Assuming a population of 50,400 (2.4/ unit). Including: 8ha total open space per 1000 population.	60.48	60.48	56.45	100.80	52.42	32.26	40.32	
Environment/waste - Allowance	21,000	units	Include allowance per unit to cover the provision of acoustic bunding / fencing to mitigate the impact of external sources of noise such as highways and public transport and localised solid waste recycling area.	2,550	2,058	2,706	2,498	2,770	2,949	3,029	2,440

## Cumulative Development Schedule

Infrastructure	Demand arising from development	Unit of demand	Commentary/assumptions	Phase 1 2,550	Phase 2 4,608	Phase 3 7,314	Phase 4 9,812	Phase 5 12,582	Phase 6 15,531	Phase 7 18,560	Phase 8 21,000									
Utilities - Scheme-Wide Enabling Works																				
Site Preparations and Earthworks			Assume Site Area of 1,169ha plus an allowance for an additional 10% of this area to allow for works outside of the core development area and within the site boundary.	12%	10%	13%	12%	13%	14%	14%	12%									
General demolition and site clearance 1,286 ha = m²	12,860,000	m²																		
Strategic Earthworks; cut and fill																				
Highways																				
Primary and secondary road network																				
Drainage																				
Foul and surface water network																				
Landscaping																				
Cost captured in open space																				
Noise attenuation																				
Cost captured in open space																				
Waste Management																				
Provision for recycling on site, excluding new amenitys	21,000	Nr																		
Energy																				
104 No. 11 kV to 400 V distribution substations	104	Substations																		
12 No. 11 kV ring circuits from primary substation to connect to distribution substations.	12	Ring Circuits																		
400 V LV circuits from distribution substations to end users	21,000	Circuits/Unit																		
Residential Electricity Connections																				
Budget cost per Low Voltage (LV) Service Disconnection																				
Potable water																				
New network of distribution pipework		Network																		
Water mains, connections and infrastructure charges																				
Waste Water																				
New network of collection pipework	21,000	Network																		
Plot connections for all properties to waste water distribution network	21,000	Connections																		
Gas																				
Low Pressure Residential Connections																				
Utilities - Off-Site Requirements																				
Electricity																				
New 2 x 125 MVA Primary Substation		MVA				100%														
12km 132 kV Overhead Line connection to Colchester substation		% of overall provision		100%																
Electricity Diversion Works				100%																
Potable Water																				
Connection to closest feasible supply source with capacity (e.g. trunk main or reservoir)				100%																

Cumulative Development Schedule											
Infrastructure	Demand arising from development	Unit of demand	Commentary/assumptions	Phase 1 2,550	Phase 2 4,608	Phase 3 7,314	Phase 4 9,812	Phase 5 12,582	Phase 6 15,531	Phase 7 18,560	Phase 8 21,000
<b>Waste Water / Foul Water</b>											
Upgrades to water course discharges / Surface Water		Upgrades		100%							
13km connection to existing waste water treatment works				100%							
<b>Gas</b>											
Extension to Medium Pressure network				100%							
1 No. Medium to Low Pressure reducing station	1	Station		100%							
Budget cost per lowering of a 180mm Low Pressure Gas Main to accommodate a site entrance.	2	Site Entrance	Assuming 2nr site entrances	100%							
Budget cost per lowering of a 225mm Medium Pressure Gas Main to accommodate a site entrance.	2	Site Entrance	Assuming 2nr site entrances	100%							
<b>Telecommunications</b>											
Development of access chambers for BT Telecoms network, BT Openreach fibre optic network and private telecoms network throughout development				12%	10%	13%	12%	13%	14%	14%	12%
Budget cost per fibre provider for the diversion of underground apparatus at a single location	3	Nr	Assuming 3nr providers	100%							
<b>Transport</b>											
A3 - Active Modes link (Church Lane - Marks Tey station)		% of total provision		100%							
Park & Ride facilities & interchange with RTS		% of total provision	To provide for interchange between modes, including provision of park & ride (as appropriate)	10%	90%						
Internal Road Network			Include in enabling costs								
Walking and Cycling connections				100%							
Additional bridges over railway line (2 vehicular & 3 pedestrian/cycle)				40%	14%		40%	6%			
A2 & A4 - Active Modes Connections to Rural Hinterland, Cycle Links		% of total provision	A4 upfront (cycle links) with remainder hinterland	30%	10%	15%	10%	10%	15%	10%	
Marks Tey Station and junction package & Stane St reduction			Various work to station and environs	58%	42%						
R2 - A12 Southern junction with Garden Community. R2 in MAS			Delivered in line with A12 improvements.	100%							
Widest realignment of A12 as part of improvements			Delivered in line with A12 improvements.	100%							
A12 capacity improvements around Kelvedon			Delivered in line with A12 improvements.	100%							
On site RTS route and related improvements/facilities				60%	20%	20%					
Contribution to provisions of off site RTS network				60%	20%	20%					

Cumulative Development Schedule											
Infrastructure	Demand arising from development	Unit of demand	Commentary/assumptions	Phase 1 2,550	Phase 2 4,608	Phase 3 7,314	Phase 4 9,812	Phase 5 12,582	Phase 6 15,531	Phase 7 18,560	Phase 8 21,000
Per Unit Contributions											
Investment in early phase bus/transit services		% of total provision		75%	25%						
Contribution to A120		% of total provision	Delivered from day one with funding annually	12%	10%	13%	12%	13%	14%	14%	12%
Travel plan measures (smarter choices, car clubs, charging points, etc) - Straight Line Cost Over Time		% of total provision	Aligned to Modal Shift analysis (ITP) Delivered from day one with funding annually	12%	10%	13%	12%	13%	14%	14%	12%
Open Space Endowment		% of total provision	Delivered from day one with funding annually	12%	10%	13%	12%	13%	14%	14%	12%
Employment Space		% of total provision		12%	10%	13%	12%	13%	14%	14%	12%

# North Essex Authorities

Infrastructure Order of Cost Estimate [41,000 Homes]

North Essex Authorities  
Gleeds Cost Management  
Project LNCM 0931

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Version: 1  
Date: 01/07/2019

# Executive Summary

Gleeds have undertaken a review of the cost of infrastructure works associated with the development of 41,000 homes across 3 new garden communities in North Essex. This report is based on the design information contained within AECOM's Infrastructure Planning, Phasing and Delivery (NEGC IPPD) Draft Report dated July 2019..

We have identified clear assumptions within our report under Section 5.

This estimate reflects prices at Q4 2018 based on the details referenced therein. The pricing basis of this preliminary budget estimate is current market conditions and should be reviewed at regular intervals of no longer than 3 months.

Throughout the cost estimating process we have worked collaboratively with other consultants. The infrastructure requirements have been informed by review of the design information as set out in the AECOM IPPD Draft Report July 2019, and in some cases estimated using metrics outlined in ECC Developer's Guide to Infrastructure Contributions Document. We have also incorporated Essex County Councils' guidance on Education requirements, UCML guidance on utilities provisions, Essex Highways guidance on Rapid Transit System requirements and the North Essex Authorities guidance on Per Unit Contributions.

A number of benchmark data are identified within this report; however, the following are key priorities during the next stage of the feasibility design;

- Inflation Forecast to be reviewed
- Refined design information to determine accurate benchmark information
- Strategic review of associated risk



# Introduction

## Overview

Gleeds have been asked to provide cost advice for the community infrastructure and enabling works required to support the delivery of 41,000 homes across three new garden communities over a number of phases in Essex to Garden Community Principles.

Whilst it is too early to provide detailed substantiation behind the Order of Cost Estimate contained within this report, this report aims to give the NEA the intended guidance of the likely cost associated with the infrastructure works.

This report presents the findings of a “high-level” design assessment based on AECOM’s IPPD Draft Report dated July 2019. Identifying three broad locations at West of Braintree, Tendring Colchester Borders and Colchester Braintree Borders. It is noted that these analysis and options will continue to evolve, and the basis of our report is the assumed delivery of 41,000 homes as outlined within AECOM’s IPPD Draft Report dated July 2019 and the number of homes proposed for each of the Garden Communities is as follows:

Site	Gleeds	AECOM
	Number of Residential Units	Number of Residential Units
1 - West of Braintree	12,500	12,500
2 - Tendring Colchester Borders	7,500	7,500
3 - Colchester Braintree Borders	21,000	21,000
	41,000	41,000

Garden Community	NEA	ONS	Gleeds
	Number of Residential Units	Anticipated Population	£ / Residential Unit
Site 1 – West of Braintree	12,500	30,000	£64,000
Site 2 – Tendring Colchester Borders	7,500	18,000	£66,000
Site 3 – Colchester Braintree Borders	21,000	50,400	£63,000

Please note: £ / Residential Unit rates reflect prices at 4Q2018 and include 10% Professional Fees and 10% Risk.

### Infrastructure Costs per Site:

	Site 1	Site 2	Site 3	All Sites
	West of Braintree	Tendring Colchester Borders	Colchester Braintree Borders	
<b>Number of Units</b>	<b>12,500</b>	<b>7,500</b>	<b>21,000</b>	<b>41,000</b>
	(£ Total)	(£ Total)	(£ Total)	(£ Total)
<b>Education</b>	105,930,000	65,250,000	172,350,000	343,530,000
<b>Healthcare &amp; Community</b>	23,260,000	13,020,000	36,090,000	72,370,000
<b>Open Space</b>	39,850,000	23,910,000	66,950,000	130,710,000
<b>Utilities - Scheme-Wide Enabling Works</b>	230,420,000	138,640,000	389,980,000	759,040,000
<b>Additional Onsite Requirements</b>	8,340,000			8,340,000
<b>Utilities - Off-Site Requirements</b>	34,910,000	27,250,000	70,360,000	132,520,000
<b>Transport</b>	140,830,000	108,740,000	248,850,000	498,020,000
<b>Per Unit Contributions</b>	81,690,000	30,710,000	117,600,000	230,000,000
<b>Total Construction Cost (exc. Fees and Risk)</b>	<b>665,230,000</b>	<b>407,520,000</b>	<b>1,101,780,000</b>	<b>2,174,530,000</b>
<b>Cost per Unit (exc. Fees and Risk)</b>	<b>53,000</b>	<b>54,000</b>	<b>52,000</b>	<b>53,000</b>
<b>Professional Fees (10%)</b>	66,520,000	40,750,000	110,180,000	217,450,000
<b>Project Risk (10%)</b>	73,180,000	44,830,000	121,200,000	239,200,000
<b>Total Cost at 4Q2018 (exc. VAT)</b>	<b>804,930,000</b>	<b>493,100,000</b>	<b>1,333,160,000</b>	<b>2,631,180,000</b>
<b>Cost per Unit</b>	<b>64,000</b>	<b>66,000</b>	<b>63,000</b>	<b>64,000</b>

### Assumptions:

- Number of units as per the AECOM IPPD Draft Report dated July 2019.
- Anticipated population assumes a population per household rate in line with the Office for National Statistics (ONS, 2017) average of 2.4 persons per household.

### Professional Fees and Risk Allowances:

- Professional fees assumed at 10%.
- Project risk assumed at 10%. Given the high-level nature of this estimate, we have assumed 10% Risk as a reasonable starting point. Risk allowance and allocation on an item by item basis should be strategically reviewed as a key priority.

This report provides the analysis and conclusions that derived from a select group of documents given the works that has gone into the Garden Communities Charter and the three Borough Councils Local Plan process. We also used the objectives as set out in the NEGC Concept Feasibility Study. A schedule of information used can be found in Appendix D.



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## HRA Report for North Essex Authorities Shared Strategic Section 1 Local Plan

Prepared by LUC  
July 2019

## 7 Conclusion

- 7.1 At the Screening stage, Likely Significant Effects on European Sites, either alone or in combination with other plan and projects, were identified as follows.
- **Loss of offsite habitat** – Abberton Reservoir SPA/Ramsar, Blackwater Estuary SPA/Ramsar, Hamford Water SAC, Hamford Water SPA/Ramsar, Stour and Orwell Estuaries SPA/Ramsar, and Colne Estuaries SPA and Ramsar.
  - **Recreational Impacts** – Abberton Reservoir SPA, Essex Estuaries SAC, Hamford Water SAC, Hamford Water SPA/Ramsar, Stour and Orwell Estuaries SPA and Ramsar, Colne Estuary SPA/Ramsar, Blackwater Estuary SPA/Ramsar and Outer Thames Estuary SPA.
  - **Water quality** – Essex Estuaries SAC, Stour and Orwell Estuaries SPA/Ramsar, Colne Estuary SPA/Ramsar.
- 7.2 The Appropriate Assessment stage identified whether the above Likely Significant Effects will, in light of mitigation and avoidance measures, result in adverse effects on the integrity of the European sites either alone or in-combination with other plans and projects. Where necessary, suitable mitigation measures and modified policy wording is recommended which would enable a sufficient level of certainty to conclude no Adverse Effect on the Integrity of European sites.

### Loss of offsite habitat

- 7.3 The Tendring and Colchester Borders Garden Community and larger housing allocations on the edge of Clacton-on-Sea were identified as providing suitable offsite foraging habitat for golden plover and lapwing in the form of arable fields and short grazed pasture. In isolation the importance of these sites for these species is likely to be low when compared with the extensive areas of habitat of greater suitability both within the North Essex Authorities and the wider land areas surrounding these European sites, particularly given the influence of limiting factors such as distance from SPAs, disruption of flight paths by urban settlements, and presence of edge features. As a result, the potential for the loss of offsite habitat to adversely affect these species related primarily to the cumulative effect of reducing the extent of feeding areas. The likelihood of this occurring was considered low given the quality of the habitat affected and the small amount of habitat affected as a proportion of that available around each of the European sites.
- 7.4 Nevertheless, despite the above, uncertainty remained under the precautionary principle as to whether the loss of sites will cumulatively adversely affect the integrity of the SPA/Ramsar sites in relation to golden plover and lapwing. Given the dependency of these species on offsite arable fields and grasslands, inclusion and implementation of appropriate safeguards and mitigation has been recommended for inclusion in the Shared Strategic Section 1 Local Plan to provide certainty that there will be no adverse effect on the integrity of the Stour and Orwell SPA/Ramsar, Hamford Water SPA/Ramsar, Colne Estuary SPA/Ramsar, Blackwater Estuary SPA/Ramsar, and Abberton Reservoir SPA/Ramsar.
- 7.5 Mitigation required in the Shared Strategic Section 1 Local Plan includes:
- Wintering bird surveys as part of any project level development proposals and masterplanning for the Tendring and Colchester Borders Garden Community, undertaken as part of a coordinated approach with the parallel requirement which has been identified as mitigation for certain site allocations in the HRA of the Tendring District Draft Section 2 Local Plan.
  - A commitment to phasing of development and mitigation. This may include provision of appropriate mitigation in the form of habitat creation and management in perpetuity, either on-site or through provision of strategic sites for these species elsewhere.
- 7.6 The mitigation measures recommended in this HRA are considered precautionary, appropriate and effective. Given its size, the Tendring and Colchester Borders Garden Community would likely be capable of mitigating for its own impact on-site if necessary, and therefore the above measures

have been recommended to provide certainty that the cumulative effect of habitat loss would not result in significant adverse effects.

- 7.7 **In conclusion, providing that the above mitigation safeguards are incorporated into the Shared Strategic Section 1 Local Plan, and are implemented successfully, adverse effects on the integrity of the Stour and Orwell SPA/Ramsar, Hamford Water SPA/Ramsar, Colne Estuary SPA/Ramsar, Blackwater Estuary SPA/Ramsar, and Abberton Reservoir SPA/Ramsar, as a result of loss of offsite functionally linked habitat will be avoided.**

### Recreational impacts

- 7.8 The assessment concluded that the Section 1 Local Plan will not result in adverse effects on the integrity of the Outer Thames Estuary either alone or in-combination, and no mitigation is required.
- 7.9 The assessment concluded that the existing avoidance and mitigation measures in place at Abberton Reservoir (e.g. site management) are sufficient to ensure that the Section 1 Local Plan will not result in adverse effects on the integrity of the SPA either alone or in-combination.
- 7.10 Recreational impacts were identified as a key threat to Essex Estuaries SAC, Hamford Water SAC, Hamford Water SPA/Ramsar, Stour and Orwell Estuaries SPA and Ramsar, Colne Estuary SPA/Ramsar and Blackwater Estuary SPA/Ramsar, both alone and, in the case of the Stour and Orwell Estuaries SPA/Ramsar, as a result of in-combination effects with the Local Plans of neighbouring Suffolk Authorities.
- 7.11 This issue is an increasingly prevalent threat to European sites across the UK, and in response to emerging research and evidence, the consensus between Local Authorities, Natural England, and other key stakeholders such as the RSPB and the Wildlife Trusts, was that the most appropriate method of mitigation and avoidance is via implementation of Recreational disturbance Avoidance and Mitigation Strategies (RAMS) which provides a multi-faceted approach and is adaptive and responsive to regular monitoring.
- 7.12 Eleven Essex Authorities, including the NEAs, have produced a final draft of the Essex coast RAMS in close consultation and approved by Natural England, with each authority taking the RAMS to its elected members for approval in Spring 2019. The authorities have also drafted a Supplementary Planning Document (SPD) which will facilitate the delivery of the Essex coast RAMS. Consultation on the draft SPD will take place in 2019, in accordance with the Statement of Community Involvement of each Authority. It is anticipated that the SPD will be adopted by each LPA in 2019.
- 7.13 This strategic approach has the following advantages:
- It meets the requirements of planning legislation: necessary to make a development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to a development;
  - It is endorsed by Natural England and has been used to protect other such Sites across England;
  - It is pragmatic: a simple and effective way of protecting and enhancing the internationally important wildlife of the Essex coast and will help to reduce the time taken to reach planning decisions;
  - It allows for detailed evidence to be gathered to understand the recreational disturbance patterns and provide an effective mitigation package;
  - It provides an evidence based and fair mechanism to fund the mitigation measures required as a result of the planned residential growth; and
  - It provides developers, agents and planning authorities with a comprehensive, consistent and efficient way to ensure that appropriate mitigation for residential schemes within the Zone of Influence is provided in an effective and timely manner
- 7.14 As a result of this approach there is a high degree of certainty that the impacts identified in this assessment can be avoided.

- 7.15 As a result, **the Appropriate Assessment concluded that the Shared Strategic Section 1 Local Plan will not result in adverse effects on the integrity of European Sites as a result of recreational pressures, either alone or in-combination, due to the adequacy, appropriateness and effectiveness of the avoidance and mitigation measures proposed.**

### Water quality

- 7.16 The assessment concluded that adverse effects on the integrity of European sites as a result of changes in water quality can be avoided provided the above additional commitments and policy safeguards are included in the appropriate Local Plan document, such as a commitment to ensure that phasing of development does not exceed infrastructure capabilities and that the necessary upgrades are in place prior to development coming forward.
- 7.17 As a result of the policy safeguards which will be provided, **the Shared Strategic Section 1 Local Plan will not result in adverse effects on the integrity of the Stour and Orwell Estuaries SPA/Ramsar, the Colne Estuary SPA/Ramsar and Essex Estuaries SAC as a result of changes in water quality, either alone or in-combination due to the ability and commitment to address water treatment capacity issues prior to specific developments.**

### Overall conclusion

- 7.18 The approach being taken by the North Essex Authorities in addressing the key issues, particularly the strategic and collaborative approach, and working closely with Natural England, is advocated and deemed to be the most appropriate and pragmatic approach in ensuring that the Shared Strategic Section 1 Local Plan is sound.
- 7.19 In light of the People Over Wind and Holohan ruling, it can be confirmed that the findings of the HRA rely on avoidance and mitigation measures only at the Appropriate Assessment and that the complex relationships between qualifying and non-qualifying habitats and species for each site are taken into account.
- 7.20 **In conclusion, providing that key recommendations and mitigation requirements are adopted and implemented, the Shared Strategic Section 1 Local Plan will not result in adverse effects on the integrity of European sites either alone or in-combination.**

**North Essex Authorities' Position Statement on Delivery Mechanisms**

1. The National Planning Policy Framework 2012 requires local plans to be deliverable. This is reflected in the "effective" part of the soundness test, which requires local plans to be deliverable over the plan period (para. 182). In addition the NPPF requires local planning authorities to take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, using the full range of powers available to them.
2. From the outset the North Essex Authorities have been concerned to ensure that the proposed garden communities are deliverable. That concern is evidenced in work such as the Garden Communities Concept Feasibility Study (EB/008) which undertook an analysis of the constraints and opportunities within areas of search and the further more detailed work undertaken in the Concept Frameworks for each proposed garden community (EB/012, EB/026 and EB/027).
3. Further work has since been undertaken which supports these initial conclusions. The NEA have investigated the possible physical and financial constraints and are satisfied, on the basis of the evidence prepared, that each of the communities is deliverable.
4. In most cases local plan allocations are supported by landowners and developers who, in normal market circumstances, will then take responsibility for the development of allocated sites. The ability of landowners and developers to deliver is not usually examined in detail.
5. The NEA appreciated that the scale and complexity of the proposed garden communities, and the need to secure a high quality of development over a lengthy period of delivery, required them to consider how each community would be developed. Their approach was described in the submission draft Local Plan:

**8.11** At least two of the three garden communities will be cross-boundary, and continued close joint working between the authorities involved will be required to secure their successful delivery. Each of the authorities is committed to ensuring that the new garden communities are as sustainable and high quality as possible and that the infrastructure needed to support them is delivered at the right time. This will require the local authorities to work very closely with the landowners within the proposed garden community locations to develop and put in place a robust delivery mechanism that will ensure a fair and equitable distribution of the costs and land requirements needed to secure the ambitions for these garden communities and create a long term legacy appropriate to the scale of this ambition. The Councils have developed and incorporated Local Delivery Vehicles (LDV) that could be used to deliver the garden communities. The Councils are aware of the emerging Government proposals for locally led new town development corporations that may offer an alternative means of delivery. Other delivery models are also being considered, and an appropriate tailored approach will need to be used in relation to each community. The Councils are confident that the LDV models viable and can deliver successful and sustainable garden communities, but will continue to explore other ways of achieving the vision that offer similar levels of confidence that the right quality of development will be delivered at the right time. The North Essex Garden Communities Charter has provided a good starting point in creating a framework for this approach.

6. Ahead of the publication of the draft Local Plan in 2017 and in order to be confident about delivery the four Councils set up a joint company, North Essex Garden Communities Ltd to act, through local delivery vehicles, to deliver the proposed communities. At the time of the publication of the draft Local Plan the intention was that the four Councils would use, if necessary, the then existing planning, compulsory purchase and other powers to assist NEGC in delivering the communities. Each of the Councils agreed in principle to this approach.
7. That approach was reflected in the NEGC Charter which envisaged that the garden communities would be delivered through local delivery vehicles. The draft Local Plan made it clear, however, that the NEA remained willing to consider other delivery models if other approaches offered similar levels of confidence that the right quality of development would be delivered at the right time. In particular, the draft Local Plan noted that the NEA were aware of the emerging Government proposals for locally led new town development corporations (LLNTDCs) and recognised that those proposals offered an alternative means of delivery.
8. Since the submission of the draft Local Plan in June 2017 there has been an increased Government focus on both the delivery of new homes and on garden communities. On delivery this has led to the introduction of the Housing Delivery Test that puts a far stronger emphasis on local planning authorities having a responsibility to secure the delivery of new homes. The commissioning of the Letwin Report indicated the Government's agenda.



9. The Government introduced new statutory provisions to allow for the promotion of LLNTDCs. Since the initial examination in public that legislative framework has been supported by detailed regulations, guidance on when LLNTDCs can be incorporated and draft guidance on the use of compulsory purchase powers by LLNTDCs.
10. In the light of these changes the four Councils believe that an LLNTDC is clearly an appropriate model for delivering the garden communities. It provides a clear and long-lasting vehicle committed to delivering the ambitions of the draft Local Plan, with statutory obligations to ensure good design, stewardship and community participation. LLNTDCs also have planning and compulsory purchase powers that make delivery simpler than would have been the case using existing local authority powers.
11. The NEGC Charter and draft Local Plan has been amended to refer to the potential for the NEA's to deliver the garden communities via LLNTDCs. These amendments do not preclude other options being explored and for the purposes of the draft Local Plan the NEA do not rely on the use of an LLNTDC. If other delivery models can achieve the same levels of confidence about quality, equalisation, delivery, stewardship and control throughout the plan period and beyond they will continue to be explored. It may be the case that different models emerge in each garden community, perhaps with joint venture or land owner agreement arrangements under the umbrella of an LLNTDC. It will ultimately be for the NEA to make a decision on a community by community basis.
12. It is important to note that the use of the compulsory purchase powers of an LLNTDC is not needed in order to secure the viability of the garden communities. If an LLNTDC is used then the landowners of any land compulsorily acquired will be compensated in accordance with the compensation code. Land will be valued in accordance with the "no scheme" world principles. The effect of the 'no scheme principle' is that any increase in value attributable to the designation of land as a new town under section 1 of New Towns Act 1981 is to be disregarded when assessing compensation. The compensation payable will depend on the likely development prospects of that land at the time of acquisition. In the absence of the garden community scheme most of the land in the proposed garden community boundaries is

not developable in the foreseeable future. The NEA have received professional advice that the land would be valued at close to the existing use value, with a margin in appropriate circumstances to reflect any existing hope value or development prospects.

13. If an LLNTDC is not the delivery vehicle and the garden communities are brought forward by landowners and developers they will be expected to meet all costs associated with the delivery of the garden communities in accordance with the policies in the draft Local Plan and in the proposed Strategic Growth DPDs. Land prices in the area will have to adjust to reflect those policy requirements.
14. If landowners are unwilling to release land at prices that allow for development to proceed whilst meeting Local Plan policy requirements then the NEA remain willing, in principle, to use CPO powers to ensure that land is acquired to support the delivery of the new communities whether by LDVs or by private promoters if that ensures that the development meets development plan policy requirements. Paragraph 119 of NPPF 2018, which would be relevant to any future CPO, supports the use of compulsory purchase powers where it can help bring more land forward to meet development needs and/or secure better development outcomes.
15. The compensation value paid in those circumstances would either be the value of the land in the no scheme world (since the use of CPO powers would then suggest that in the absence of a CPO appropriate development is not possible) or the residual value of the land having met policy requirements. The former reflects the valuation principles that would apply to LLNTDCs. The latter reflects RICS guidance principles on valuation.

**North Essex Authorities**

**July 2019**

**North Essex Authorities' Position Statement on State Aid****Summary**

1. This note provides a brief summary of the application of state aid law to the North Essex garden community proposals. It concludes that there is no legitimate objection to the Section 1 Local Plans on state aid grounds.

**State aid**

2. State aid is an advantage granted by a public authority through state resources on a selective basis to an undertaking in a way that could potentially distort competition and trade in the European Union.
3. State aid rules can apply to the following (and other) forms of assistance:
  - a. grants;
  - b. loans;
  - c. tax breaks;
  - d. the use or sale of a state asset at less than market value.
4. State aid may fall within an exemption and therefore permissible. It may be notified to the EU and cleared. If state aid is not notified, is not within an exemption and is found to be unlawful the recipient will normally be required to repay the state aid.
5. State aid rarely arises in relation to policy or plan-making unless the aid is a direct and inevitable consequence of the policy or plan. Even where the conditions for state aid exist in principle consideration needs to be given to whether the aid is part of the object or nature of the scheme. If so it will not normally be treated as aid.
6. So far as we are aware there have been no cases where a local plan proposal or policy has been found "unsound" as a consequence of state aid issues.

### **Timing for consideration of state aid**

6. When the detailed delivery mechanisms for the garden communities are discussed and decided, state aid issues will be addressed. The delivery mechanisms will either have to be state aid compliant, fit within an appropriate exemption or approval will need to be sought from the Commission.
7. There is no reason to believe, and certainly no evidence to suggest, that a state aid compliant approach to delivery cannot be achieved.

### **NEA Local Plans Section 1: identification of broad locations**

7. The North Essex Local Plan Section 1 identifies three broad locations for garden communities. There is no conceivable way in which the identification of a broad location for development on land outside public ownership can amount to state aid.

### **Choice of delivery vehicle**

8. Section 1 of the Local Plans makes it clear that the North Essex Authorities (NEAs) have considered a number of delivery options. It is not prescriptive about the method of delivery. That approach to delivery cannot reasonably give rise to any state aid concern at the Local Plan level.
9. The available options include the delivery of one or all of the garden communities by the private sector acting independently within the development plan framework. That would clearly not result in any state aid.
10. The NEAs have indicated a willingness to explore either direct delivery of the garden communities by local delivery vehicles (LDV) (using existing local authority powers) or the promotion of a locally-led new town development corporation. The commitment is intended to demonstrate that the development of garden communities will occur even in the absence of a willing private sector promoter. It is evidence that mechanisms exist for the public sector to step in, if appropriate, to secure delivery of the garden communities.

11. Since the Local Plan examination, the New Towns Act 1981 (Local Authority Oversight) Regulations 2018 have been made (the Regulations). Guidance on the Regulations was issued in June 2018. Draft CPO guidance has been issued. There is now a clear structure within which locally-led garden communities (LLNTDC) can be brought forward. It is a structure that the Government believes is capable of being state aid compliant.
12. It is proposed that any LDV or LLNTDC will be publicly held. They will invest in infrastructure and will endow stewardship arrangements to support the garden communities. They will sell land for development at market value. There is no component of state aid in arrangements of this type.
13. The LDVs and the LLDC may transact with or joint venture with the private sector. If so they will do so on commercial terms. There is no state aid issue arising out of commercial transactions.

### **Financial modelling**

14. As part of the evidence base for the examination, the NEAs have provided further financial modelling of the viability of the proposed garden communities. That modelling assumes that any investment in, or loans to, any delivery vehicle will be made on market economy operator principles (MEOP) basis. If investment and/or loans are made on an MEOP basis it is not state aid.
15. In considering the appropriate terms of any investment or interest, consideration will need to be given to the nature and structure of any local authority vehicle and/or development corporation. That will take account of the capitalisation arrangements for the company, the land ownership position (including the security offered by land controls), the residual responsibility for any liabilities on termination of the delivery vehicle and the prevailing European Commission state aid reference rates. The Regulations specify that the local authorities comprising the oversight authority are ultimately responsible for the liabilities of the LLNTDC. That will be taken into account in identifying appropriate reference rates.

16. It is believed that the modelled approach and the identified interest rates represents an MEOP compliant approach for the proposed delivery arrangement. That conclusion is supported by the soft market testing that has been carried out on behalf of the NEAs.
17. The model assumes that government grant will be given to fund infrastructure related to the two of the garden communities. Grant will not be provided unless it is state aid compliant. Factors indicating compliance include:
  - a. the public sector nature of the grant recipient – the grant could be characterised simply as the transfer of funds within the overarching UK State;
  - b. the extent to which the infrastructure benefits the wider public;
  - c. any land benefitting from public infrastructure will be sold on at market rate.
18. The proposed grant does not engage any state aid concern.
19. At present the modelling does not assume that there will be a need for any public sector guarantees. If guarantees are proposed they would need to be appraised to ensure that they were state aid compliant.

#### **Government investment**

20. The Government has committed to significant investment in the transport network in North Essex. The A12 and A120 will both be upgraded. Both schemes are identified requirements to meet future growth regardless of the garden communities. The A12 is funded. A final decision on the A120 upgrade is anticipated in due course.
21. National infrastructure generally benefits the public at large. Unless it clearly and directly offers an advantage to one or more organisations it will not be state aid. There is no realistic suggestion that either the A12 or the A120 projects (or any other identified investment) amounts to state aid.

## **Land Acquisition**

22. If either the LDV or the LLNTDC route is followed then land will either be purchased voluntarily at market value, or will be compulsorily acquired. If compulsorily acquired the general principles of compensation require market value to be paid. If acquired by the local authorities it will be transferred to the LDV at market value. If market value is paid for land the transaction cannot be state aid.

## **Conclusion**

23. Unless state aid is a direct and inevitable consequence of the development plan approach it cannot, properly, be a basis for finding the plan unsound. There is no evidence to suggest that aid is a consequence of the proposed approach.
24. In relation to each of the elements of state aid the proposed arrangement will not:
- a. offer any advantage through state resources;
  - b. advantage, on a selective basis, any identified undertaking or class of undertaking;
  - c. distort competition and trade in the EU.
25. Each of these elements needs to be met for a transaction to amount to state aid. None are met.
26. In any event, any consideration of state aid is premature. State aid issues will be considered (if any), fully and properly, when the approach to delivery of the garden communities is settled.

**North Essex Authorities**

**July 2019**







# Suggested Amendments to the Publication Draft Braintree, Colchester and Tendring Local Plans: Section One

July 2019

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
1	Colchester Local Plan Front Cover	The Publication Draft stage of the Colchester Borough Local Plan <b>2013</b> <del>2017</del> -2033	Align start date with start dates for Braintree and Tendring Local Plans
2	Tendring Local Plan	Change numbering to match Braintree and Colchester numbering for Section 1	To ensure consistency between all plans
3	Para 1.9 1 <sup>st</sup> line	Consequently, Braintree, Colchester and Tendring, <b>together referred to in this plan as the North Essex Authorities</b> , have agreed to come together <b>and prepare a common Section1 Local Plan</b> because of their shared desire to promote a sustainable growth strategy for the longer term; and the particular need to articulate the strategic priorities within the wider area and how these <b>priorities</b> will be addressed.	To clarify terminology and role of Section 1 Local Plan
4	Para 1.12	This strategic chapter <b>Section 1</b> of the authorities' Local Plans reflects the Duty to Co-operate as it concerns strategic matters with cross-boundary impacts in North Essex. <b>Section 2 of each plan contains policies and allocations addressing authority-specific issues.</b>	To clarify terminology and role of Section 1 Local Plan
5	Para 1.18 2 <sup>nd</sup> line	It also carries freight traffic to and from <b>the Haven Ports including</b> Harwich International Port, which handles container ships and freight transport to and from the rest of the UK.	Change required for clarification. The key generator of freight on the GEML is the Port of Felixstowe although Harwich contributes to this demand.

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
6	Section heading prior to para 1.25	Key <b>Strategic</b> Issues: Opportunities and Challenges	To clarify issues considered in Section 1
7	Para 1.26 last sentence	... <del>does not erode the special environment,</del> <b>continues to conserve and where possible enhance the historic environment (Mod A) and will also seek net environmental gains where possible, (Mod B)</b> <del>heritage and urban assets...."</del>	To ensure that development considers net environmental gains where possible, consistent with NPPF paragraph 9.
8	Para 1.30 New 3 <sup>rd</sup> sentence	...The vision for North Essex sets this out at a strategic level and provides a context for the more detailed vision for the growth of each individual authority's area. <b>The joint vision set out below should be read in conjunction with the vision for each local authority set out in Part 2 of each Local Plan.</b> The high housing need identified for North Essex, constraints in many existing urban areas and the desire to support a sustainable form of development in the long term as part of the strategy for the development, <b>has led to the</b> Local Plans <del>are</del> proposing standalone new settlements that follow the principles of Garden Communities.	To clarify the role of Sections 1 and 2 of the Plan.
9	Para 1.32 Final sentence	...Policies that address local matters are included in the following section of the plan. <b>The Plan as a whole, including both Sections 1 and 2, will supersede previous Local Plan policies and allocations upon its adoption. A full list of superseded policies is included as an appendix following Section 2 of the plan.</b>	To meet national requirements (Appendix 2 below provides a list of Colchester and Tendring policies that will be superseded by

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
			the new plan. (already included in Braintree plan))
10	<b>Vision for North Essex</b>	<p>North Essex will be an area of significant growth over the period to 2033 and beyond, embracing positively the need to build well-designed new homes, create jobs and improve and develop infrastructure for the benefit of existing and new communities.</p> <p><b>It will continue to be an attractive and vibrant area in which to live and work, making the most of its rich heritage, town centres, natural environment, coastal resorts, excellent educational facilities and strategic transport links which provide access to the ports, Stansted Airport, London and beyond. Rural and urban communities will be encouraged to thrive and prosper and will be supported by adequate community Infrastructure. (Mod A)</b></p> <p>Sustainable development principles will be at the core of the strategic area's response to its growth needs, balancing social, economic and environmental issues. Green and blue infrastructure and new and expanded education and health care facilities <b>enabling healthy and active lifestyles (Mod B)</b> will be planned and provided along with other facilities to support the development of substantial new growth; while the <b>undeveloped</b> countryside, <b>(Mod C) natural environment (Mod D)</b> and the countryside and <del>heritage assets</del> <b>historic environment</b> will be <del>protected</del> <b>preserved</b> and enhanced. <b>Key to delivering sustainable development is that new development will address the requirement to protect and enhance be informed by an understanding of the historic environment and settlement character (Mod E)</b></p> <p>At the heart of our strategic vision for North Essex are new garden communities, the delivery of which is based on Garden City principles covered by policy SP7.</p>	<p>To ensure the following clarifying points:</p> <p>Mod A - Highlight the strategic issues relevant to Section 1</p> <p>Mod B - Include high level strategic objective on the need to support healthy and active lifestyles</p> <p>Mod C – To clarify definition of countryside to be protected.</p> <p>Mod D- Include high level strategic objective on the need to protect and enhance the natural environment.</p> <p>Mod E - Include high level strategic</p>

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
		<p>The garden communities <b>provide an opportunity to create the right balance of jobs, housing and Infrastructure in the right locations and (Mod F)</b> will attract residents and businesses who value innovation, community cohesion and a high quality environment, and who will be provided with opportunities to take an active role in managing the garden community to ensure its continuing success. Residents will live in high quality, innovatively designed, <del>contemporary</del> homes, <b>(Mod G)</b> accommodating a variety of needs and aspirations, located in well-designed neighbourhoods where they can meet their day-to-day needs. There will be a network of tree-lined streets and green spaces, incorporating and enhancing existing landscape features and also accommodating safe and attractive routes and space for sustainable drainage solutions; and leisure and recreation opportunities for both residents and visitors of the garden communities. Suitable models for the long term stewardship of community assets will be established and funded to provide long term management and governance of assets. All Garden City principles as specified in the North Essex Garden Communities Charter will be positively embraced including new approaches to delivery and partnership working for the benefit of the new communities. <b>Central to this is the comprehensive planning and development of each garden community, and the aligned delivery of homes and the supporting infrastructure. (Mod H)</b></p>	<p>objective on the need to protect and enhance the historic environment. Mod F – Clarify role of Garden Communities in meeting planning objectives. Mod G -Reference to 'contemporary' is deleted for limiting flexibility. Strengthen references to importance of comprehensive planning for Garden Communities. Mod H– Clarify role of Garden Communities in meeting planning objectives.</p>
11	Strategic Objectives	Providing New and Improved Transport & Communication Infrastructure – to make efficient use of existing transport infrastructure and to ensure sustainable transport	Mod A – To clarify new transport infrastructure will

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
		opportunities are promoted in all new development <b><u>to support new and existing communities.</u></b> (Mod A) <i>Add sentence to end of paragraph 'Ensuring High Quality Outcomes'- New development needs to be informed by an understanding of the historic environment resource gained through the preparation of Historic Impact Assessments and to conserve and enhance the significance of the heritage assets and their settings.</i> (Mod B)	benefit both new and existing communities Mod B -To clarify requirements to conserve and enhance the historic environment.
12	Policy SP1	<del>Presumption in Favour of Sustainable Development</del> When considering development proposals the Local Planning Authorities will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. They will always work pro-actively with applicants <del>jointly</del> to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.  <del>Sustainable development in North Essex will demonstrably contribute to the strategic and local vision and objectives and will accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans).</del> Development that complies with the Plan in this regard will be approved without delay, unless material considerations indicate otherwise.  Where there are no policies relevant or the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless <del>material considerations indicate otherwise – taking into account whether:</del>	To clarify policy wording to distinguish between reference to national policy and its application in local policy.

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
		<ul style="list-style-type: none"> <li>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole or</li> <li>Specific policies in that Framework or the Plan that indicate that development should be restricted.</li> </ul>	
13	New Policy SP1A to follow after Policy SP1	<p><b>SP 1A Delivering Sustainable Development through the planning system</b></p> <p><i>Explanatory Text</i></p> <p><b>Development that is in accordance with the policies in this Plan will normally be permitted.</b></p> <p>The policies in this strategic Section 1 of the Local Plan are common to and important to each North Essex Authority. Accordingly policy SP 1A seeks to make sure that development which would prejudice the delivery of any of the policies in Section 1 will be refused. Examples of prejudice might include a failure to meet the high standards proposed in the place making principles, a lack of comprehensive development or prematurity.</p> <p><i>Policy</i></p> <p><b>Development that demonstrably contributes to the achievement of the policies in this Local Plan (and, where relevant, of policies in neighbourhood plans) will normally be permitted unless material considerations indicate otherwise.</b></p> <p><b>Development that is not in accordance with, or which will prejudice the delivery of, the strategic scale development or the achievement of the place making principles, in this Local Plan will not normally be permitted.</b></p>	To clarify policy wording to distinguish between reference to national policy and its application in local policy.
14	New Policy SP1B	<p><b>SP1B Recreational disturbance Avoidance and Mitigation Strategy (RAMS)</b></p> <p><i>Explanatory Text</i></p>	The Essex Coast RAMS Strategy

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
		<p><b>A Habitat Regulations Assessment (HRA) was completed for Section 1 of the Plan. The loss of off-site habitat, water quality and increased recreational disturbance were identified as issues with the potential to result in likely significant effects on European Sites, without mitigation, to address the effects.</b></p> <p><b>The Appropriate Assessment (AA) identified a number of avoidance and mitigation measures to be implemented, to ensure that development proposals in the Plan will not result in adverse effects on the integrity of the Blackwater Estuary SPA and Ramsar site, Colne Estuary SPA and Ramsar Site, Colne Special Area of Conservation Abberton Reservoir SPA and Ramsar, Hamford Water SPA and Ramsar Essex Estuaries SAC and the Stour and Orwell SPA/Ramsar sites and are HRA compliant.</b></p> <p><b>To mitigate for the loss of off-site habitat, the AA identified the need for wintering bird surveys for the Tendring/Colchester Borders Garden Community as part of any project level development proposals and masterplanning.</b></p> <p><b>To protect water quality, the AA recommended the inclusion of policy safeguards to ensure that adequate water and waste water treatment capacity or infrastructure upgrades are in place prior to development proceeding.</b></p> <p><b>Recreation activities can potentially harm Habitats Sites. The Shared Strategic Plan AA identified disturbance of water birds from people and dogs, and impacts from water sports/watercraft as the key recreational threats to Habitats Sites.</b></p> <p><b>To mitigate for any increases in recreational disturbance at Habitats Sites, the AA identified the need for a mitigation strategy. Natural England's West</b></p>	Document is complete and the NEAs are collecting contributions from development within the Zones of Influence. The update to the text reflects the latest position.



Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strikethrough-deleted text</del>	Reason
		<p><b>Anglian Team identified the Essex coast as a priority for a strategic and proactive planning approach as it is rich and diverse ecologically, and many of the coastal habitats are designated as Habitats Sites. Consequently, 12 local planning authorities in Essex have prepared an Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS). The Essex Coast RAMS sets out specific avoidance and mitigation measures by which disturbance from increased recreation can be avoided and mitigated thus enabling the delivery of growth without adversely affecting Habitats sites. These measures are deliverable, realistic, underpinned by robust up to date evidence, precautionary and provides certainty for developers around deliverability and contributions. The Essex Coast RAMS Strategy Document was completed in 2019 and will be supported by an SPD.</b></p> <p><i>Policy</i>  <b>SP1B Recreational disturbance Avoidance and Mitigation Strategy (RAMS)</b></p> <p><b>An Essex Coast Recreational disturbance Avoidance and Mitigation Strategy will be completed in compliance with the Habitats Directive and Habitat Regulations.</b></p> <p><b>Contributions will be secured towards mitigation measures identified in the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMs) which will be completed by the time the Local Plan is adopted. Prior to RAMS completion, the NEAs will seek contributions from proposed residential development to deliver all measures identified (including strategic measures) through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive.</b></p>	

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
15	Para 3	3. Spatial <del>Strategy</del> <b>Context</b>	Clarifies that Section 1 establishes the spatial context for new development but does not specify a spatial strategy which is found in Section 2
16	Para 3.1 2 <sup>nd</sup> line	New homes, jobs, retail and leisure facilities serviced by new and upgraded infrastructure will be accommodated as part of existing settlements according to their scale, sustainability and role, and by the creation of strategic scale new settlements <b>based on the North Essex Garden Community Charter principles</b> . The countryside will be protected and enhanced.	To clarify basis of Garden Community strategy
17	Para 3.2 2 <sup>nd</sup> line	However, it is relevant here to set out the <del>spatial strategy at an appropriate level,</del> <b>spatial context of the North Essex Area</b> as it relates to the main settlements and strategic-scale new development.	Clarifies that Section 1 establishes the spatial context for new development but does not specify a spatial strategy which is found in Section 2
18	New para 3.6	<b>The three new Garden Communities are identified as new settlements in each of the Section 2 settlement hierarchies. Over time each of the Garden Communities will grow to influence the area's spatial hierarchy and will be included in the tiers underneath the sub-regional centre role played by Colchester. Future reviews of the plans will address this point, but the</b>	To clarify the relationship of new Garden Communities to the spatial hierarchy

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
		<b>Garden Communities will not grow to a size that will affect the spatial hierarchy within the plan period to 2033.</b>	
19	Policy SP2 Title First Para	Policy SP2 –Spatial <del>Planning Strategy</del> for North Essex <b>(Mod A)</b>  Existing settlements will be the principal focus for additional growth across <b>the</b> North Essex <b>Authorities area</b> within the Local Plan period. <b>(Mod B)</b> Development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area.	Mod A – To clarify policy does not specify a spatial strategy Mod B -To clarify locational scope of plan.
	2 <sup>nd</sup> Para	<b>Policy SP6 (Place Shaping Principles), Policies SP7-10 (in respect of the Garden Communities) and Section 2 of the plan provide detail on how</b> <del>Future</del> growth will be planned to ensure <b>existing</b> settlements maintain their distinctive character and role. <b>(Mod C)</b> Re-use of previously-developed land within settlements is an important objective, although this will be assessed within the broader context of sustainable development principles, particularly to ensure that development locations are accessible by a choice of means of travel.	Mods C-D – To clarify terminology and cross-references within plan Mod E – To provide clarification of references to spatial illustrations.
	3 <sup>rd</sup> Para	Each local authority will identify a hierarchy of settlements in <b>Section 2 of its Local Plan</b> where new development will be accommodated according to the role of the settlement, sustainability, its physical capacity and local needs. <b>(Mod D)</b>	Mod F – To strengthen references to supporting employment growth
	4 <sup>th</sup> Para	<del>Beyond the main settlements the authorities will support diversification of the rural economy and conservation and enhancement of the natural environment.</del>	Mod G - To be consistent with other references in the document to Garden Communities Charter
	5 <sup>th</sup> Para	Three new garden communities will be developed and delivered as part of the sustainable strategy for growth at the locations shown on <del>Map 3.3 below and the</del>	

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
		<p><del>Proposals Map</del> <b>the Key Diagram and the Policies Map. (Mod E)</b> These new communities will provide strategic locations for <b>employment and</b> at least 7,500 <b>5,910</b> additional homes within the Plan period in North Essex. <del>Employment development will also be progressed with</del> <b>The expectation is</b> that substantial additional housing and employment development will be delivered in each community beyond the current Local Plan periods. <b>(Mod F) As specified in Policy SP7,</b> <del>they will be planned and developed drawing based on North Essex Garden City Community Charter</del> principles, with necessary infrastructure and facilities provided and a high quality of place-making and urban design. <b>(Mod G)</b></p> <p><b>Beyond the main settlements the authorities will support diversification of the rural economy and conservation and enhancement of the natural environment. (Mod H)</b></p>	(e.g. Policy SP7, penultimate paragraph). Mod H – To clarify position of rural areas in settlement hierarchy
20	Additional Paragraph 4.8	<b>4.8 The North Essex authorities will identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their individual housing requirements set out in Policy SP3 below. Each authority will incorporate an additional buffer as required by national planning policy to ensure choice and competition for land.</b>	Include reference to a Buffer as referenced in the NPPF
21	Policy SP3	<del>The local planning</del> <b>North Essex</b> Authorities will identify sufficient deliverable <b>or developable</b> sites or broad locations for their respective plan period, <del>against to meet the requirement in the table below</del> <b>and will incorporate an additional buffer to ensure choice and competition for land. (Mod A)</b>	Mod A- To include reference to a Buffer as referenced in the NPPF.

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strikethrough-deleted text</del>	Reason															
		<p>Each authority will maintain a sufficient supply of deliverable sites to provide for at least five years' worth of housing, <b>plus an appropriate buffer in accordance with national policy</b>, and will work proactively with applicants to bring forward sites that accord with the overall spatial strategy and relevant policies in the plan. <b>The annual housing requirement figures set out below will be used as the basis for assessing each authority's five-year housing land supply subject to any adjustments in Section 2 of each plan to address any undersupply since 2013. (Mod B) The North Essex authorities will review their housing requirement regularly in accordance with national policy requirements, and in doing so will have regard to the housing needs of the wider area. (Mod C)</b></p> <table><tr><td>Local Authority</td><td>Objectively Assessed Need for Housing requirement per Annum</td><td>Total minimum housing supply in requirement for the plan period (2013 – 2033)</td></tr><tr><td>Braintree</td><td>716</td><td>14,320</td></tr><tr><td>Colchester</td><td>920</td><td>18,400</td></tr><tr><td>Tendring</td><td>550</td><td>11,000</td></tr><tr><td><b>Total</b></td><td><b>2,186</b></td><td><b>43,720</b></td></tr></table>	Local Authority	Objectively Assessed Need for Housing requirement per Annum	Total minimum housing supply in requirement for the plan period (2013 – 2033)	Braintree	716	14,320	Colchester	920	18,400	Tendring	550	11,000	<b>Total</b>	<b>2,186</b>	<b>43,720</b>	Mod B – To clarify role of Section 2 in addressing undersupply issues. Mod C – To address national requirement to have regard to wider housing needs
Local Authority	Objectively Assessed Need for Housing requirement per Annum	Total minimum housing supply in requirement for the plan period (2013 – 2033)																
Braintree	716	14,320																
Colchester	920	18,400																
Tendring	550	11,000																
<b>Total</b>	<b>2,186</b>	<b>43,720</b>																
22	Para 5.9	5.9 As part of the work to assess housing requirements, an analysis of economic forecasts was undertaken together with demographic projections to establish the inter-relationship between population growth, forecasts of new jobs and the number of new homes needed to accommodate these levels of growth. <b>Employment forecasts have been developed using two standard models (East of England Forecasting Model (EEFM) and Experian 2016) which forecast total job</b>	To provide more focussed wording for the policy by moving explanatory wording to the supporting text.															

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
		<p><b>growth for each of the local authorities based on past trends. Each local authority has been advised on the most appropriate modelling figure to use in the context of reconciling job and housing demand. The forecast growth figures for the housing area for the period 2013-2037 as are set out in Policy SP4.</b> Employment Land Needs Assessments have been carried out by each authority which set out the amount of employment land that is required within the Plan period. <b>In terms of specific B use land provision, each local authority has undertaken work to establish what quantum of employment land would be required within the Plan period to meet the demand identified below for additional B use employment land. These B use employment areas are distributed between each local authority area and based on achieving a sustainable balance between jobs and the available labour force through population growth. As noted above, calculations of employment land required are affected by a range of issues that lead to different employment land portfolios for each local authority area, resulting in a proportionately greater quantum of new floorspace per job in Braintree and Tendring than in Colchester. This is a function of the prominence of higher density office requirements in Colchester and lower density logistics and industrial uses in Braintree and Tendring. The table in Policy SP4 below sets out the three authorities' employment land (B Class uses) requirements for the period 2016 – 33 for two plausible scenarios, baseline and higher growth. These two bookends provide flexibility to allow for each authority's supply trajectory to reflect their differing requirements. Site specific employment allocations meeting the needs of different sectors in each local authority are set out in section 2 of their Local Plan.</b></p>	

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strikethrough-deleted text</del>	Reason															
23	Policy SP4 Title	<del>Providing for</del> Employment and Retail	To accurately reflect the content of the policy.															
24	Policy SP4	<p>A strong, sustainable and diverse economy will be promoted across North Essex with the Councils pursuing a flexible approach to economic sectors showing growth potential across the Plan period. <b>Jobs provision is reconciled with housing demand and is informed by modelling. The following forecasts will apply to the North Essex Authorities; (Mod A)</b></p> <p>Annual Jobs Forecast:</p> <table><tr><td>Braintree (EEFM)</td><td>490</td></tr><tr><td>Colchester (EEFM)</td><td>928</td></tr><tr><td>Tendring (Experian)</td><td>490</td></tr></table> <p><i>Relocate second paragraph to supporting text – see above modifications to para 5.9 (Mod B)</i></p> <p><b>In order to meet the needs of the three authorities’ employment land requirements for B class employment uses and maintain appropriate flexibility in provision to meet the needs of different sectors, Section 2 of each plan will allocate employment land within the ranges set out below. (Mod C)</b></p> <p>Hectares of B use employment land required:</p> <table><tr><td></td><td><b>Baseline (2012-Based SNPP) (ha)</b></td><td><b>Higher Growth Scenario</b></td></tr><tr><td><b>Braintree</b></td><td><b>23-20.9</b></td><td>43.3</td></tr><tr><td><b>Colchester</b></td><td>22.0</td><td>30</td></tr></table>	Braintree (EEFM)	490	Colchester (EEFM)	928	Tendring (Experian)	490		<b>Baseline (2012-Based SNPP) (ha)</b>	<b>Higher Growth Scenario</b>	<b>Braintree</b>	<b>23-20.9</b>	43.3	<b>Colchester</b>	22.0	30	<p>Mod A – To clarify link between housing and jobs provision</p> <p>Mod B –To provide a more clearly focussed policy, leaving explanatory detail to the supporting text</p> <p>To provide more focus and clarity to policy wording.</p> <p>Mod C -The additional sentence is to make it clear that site allocations are included in section 2 plans to meet the target in policy SP4.</p> <p>Mod D – to update table with corrected figures</p>
Braintree (EEFM)	490																	
Colchester (EEFM)	928																	
Tendring (Experian)	490																	
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Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
27	Para 6.242 2 <sup>nd</sup> line	6.24 The North Essex Garden Communities Charter seeks to ensure that land use planning of the new communities maximises the provision and use of sustainable transport internally and connects externally to key urban centres. <b>Given the Charter's commitment to the timely delivery of infrastructure, policies SP7-10 will ensure that key transport projects align with housing and employment delivery.</b>	To clarify delivery process for infrastructure
28	Para 6.253 2 <sup>nd</sup> line	To achieve the desired step change in sustainable transport, <b>policy will require that</b> this infrastructure will <del>need to</del> be funded and <b>its delivery phased to align with</b> <del>provided early in</del> <b>with</b> the development phases.	To clarify delivery process for infrastructure
29	A.B Transport	<b>B Transportation and Travel</b>	Clarity
30	6.24	North Essex is well placed in the context of connections by road, rail, air and sea to the wider region and beyond, and these connections will need to be strengthened as part of developing sustainable transport networks. <del>The A12 and A120 trunk road network form part of the Trans-European Network carrying international vehicular traffic. The Great Eastern Main Line (GEML) and branch lines, link the major towns and cities via a high capacity, high frequency rail line radiating from London. The strategically important London Stansted Airport lies to the west within a 60km radius of key urban centres in North Essex. Access via sea is provided by the port at Harwich.</del>	Explanatory detail not essential.
31	Para 6.35 2 <sup>nd</sup> line	Growth promoted through the new Local Plans, particularly via large scale new developments where delivery will extend beyond the plan period, provides an opportunity to prioritise, facilitate and deliver larger scale transport infrastructure projects that can significantly improve connectivity across and within the area. <b>A</b>	To clarify focus of policy.

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
		<b>focus on sustainable transport in and around urban areas and the Garden Communities will</b> and positively alter travel patterns and behaviour to reduce reliance on the private car.	
32	<del>6.46</del>	The Local Plans seek to improve transport infrastructure <b>to enable the efficient movement of people, goods</b> and ensure that new development is accessible by sustainable forms of transport. Measures designed to encourage people to make <del>other</del> sustainable travel choices such as better public transport provision, car clubs, electric vehicle charging points and provision of cycle links and <del>walk</del> <b>footways</b> will also be required to achieve such a change. It will also help to enhance air quality and improve health and well-being.	To clarify focus of policy.
33	<del>6.57</del>	Braintree, Colchester and Tendring will continue to work closely with government departments, Highways England, Essex County Council, Network Rail, rail <b>and bus</b> operators, <b>developers</b> and other partners to better integrate all forms of transport and improve roads and public transport and to promote cycling and walking. Key projects during the plan period will see improvements to the A12, A120, Great Eastern Main Line including rail services, and provision of rapid transit connections in and around urban areas and the Garden Communities. An integrated and sustainable transport system will be delivered that supports economic growth and helps deliver the best quality of life. <del>Although the funding for some of these improvements is not guaranteed the authorities will work with providers to ensure that investment commitments will be made at the appropriate time to support the proposed growth.</del>	To clarify focus of policy. Last sentence now covered by last sentence of new para 6.4
34	Para 6.6	<del>On the inter urban road network traffic levels have increased significantly in recent years with parts of the A12 around Colchester and Marks Tey carrying up to 90,000 vehicles per day, which is high for an A-class trunk road.</del>	To delete text which is overly detailed for a strategic section of the plan.

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>striketthrough deleted text</del>	Reason
35	<del>Para 6.7</del>	<p><del>Most of the inter-urban road network, particularly the capacity of the A12, is constrained by the operation of the junctions and sub-standard slips, and periods of congestion. The East of England Route Based Strategy (March 2017) provides a review of the state of the network in the East of England (including A120 Harwich to the A12 and A12 from the M25 to A14), and will inform a Strategic Road Network Initial Report (late 2017), which will outline the ambitions for the network across 2020 – 2025 (ie Road Investment Strategy (RIS) 2 period) and beyond. Consultation on plans to improve both the A12 and A120 has taken place, and the decisions made on these proposals should be informed by the planned growth, identified in Local Plans given the connection between new planned growth and the infrastructure needed to support it.</del></p>	To delete text which is overly detailed for a strategic section of the plan.
36	Para 6.8	<p>The A12 is set to have major improvements as part of the Government's Roads Investment Strategy (2015-2020) (RIS1), with the aim of improving capacity and relieving congestion. The plans were announced in December 2014 and will represent the largest investment in road infrastructure received by Essex. The RIS confirmed</p> <ul style="list-style-type: none"> <li>• investment in a technology package for the length of the A12 from the M25 to the junction with the A14;</li> <li>• phased improvement of the road to a consistent dual 3 lane standard; and</li> <li>• improvement to the A12/M25 junction.</li> </ul> <p>Consultation on route improvement options between <b>junction 19</b> and junction 25 of the A12 concluded in March 2017. A decision by the Planning Inspectorate on the preferred improvement option is expected in 2019.</p>	To clarify terminology used and to delete text which is overly detailed for a strategic section of the plan.

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
37	Para 6.9	The A120 is a key east-west corridor across Essex providing access to London Stansted Airport in the west to the Harwich ports in the east and serving the economies of Braintree, Colchester and Tendring, with links to Chelmsford via the A130. <del>Upgrading the strategically important road will unlock greater economic potential for not only North Essex, but also the county and wider South East. It will provide tangible benefits to road users, businesses and local neighbourhoods.</del>	To delete text which is overly detailed for a strategic section of the plan.
38	Para 6.10	Consultation on A120 route improvement options between Braintree <del>and</del> the A12 ended in March 2017. <del>and ECC has identified a favoured route which has been recommended to Highways England and the Department of Transport for inclusion in Road Investment Strategy 2 (RIS2), which is the next funding period for the strategic road network and will make a recommendation for a preferred option to the Secretary of State for Transport and Highways England in Autumn 2017. ECC will recommend the preferred route to Government for inclusion in the next</del> <b>Route Investment Strategy 2</b> , which will run from 2020 to 2025. In addition a series of short term interventions will be delivered along the route to improve safety and relieve congestion. <del>The final alignment may influence the final boundaries and scale of the proposed Garden Community on the Colchester Braintree border.</del> The A120 from the A12 to Harwich is subject to a Highways England Route Based Strategy and improvements to this section of road are expected over the plan period.	To clarify terminology used and update latest position.
39	<del>Para 6.11</del>	<del>Route-based strategies are prepared and delivered by the County Council for strategic main road corridors, in consultation with local authorities. The following strategies relevant to North Essex are currently being prepared for delivery post 2018/19: A131 – Chelmsford to Braintree; A131 Braintree to Sudbury; Colchester to Manningtree and A133 Colchester to Clacton. The key objective is to identify options that will support economic growth.</del>	To delete text which is overly detailed for a strategic section of the plan.

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
40	<del>Para 6.12</del>	<del>The Great Eastern Main Line (GEML) runs between London Liverpool Street and Norwich and carries a mixture of intercity services and commuter services serving the major urban settlements; and freight from the Haven Ports (Harwich and Felixstowe). Further branch lines provide connections to Braintree, Sudbury, Harwich, Clacton and Walton</del>	To delete text which is overly detailed for a strategic section of the plan.
41	Para 6.4311 1 <sup>st</sup> line	The Anglia Route Study prepared by Network Rail (March 2016) shows that while capacity varies along the <b>Great Eastern Main L</b> ine, capacity to accommodate growth is limited and is particularly constrained in peak times from Chelmsford to London.	Name of rail line added for clarity.
42	Para 6.4513	A <del>new</del> franchise <del>has been</del> awarded to Greater Anglia for passenger services in the region. <del>New services will be provided</del> <b>which</b> commencing <b>ed in</b> 2018 and the entire fleet of trains will be replaced and in service by 2020 adding capacity.	To update text.
43	Title preceding para 6.163	<del>Bus,</del> <b>Public Transport</b> , Walking and Cycling	To better reflect contents of following paragraphs
44	Para 6.4614	Alternative forms of transport to the private car ( <b>public transport</b> , walking, <b>and</b> cycling <del>and public transport</del> ) to for travel to work and other trips are essential in managing congestion and to accommodate sustainable growth. The levels of growth proposed in the Local Plans will require that the consequent need to travel is managed. Travel planning and smarter choices initiatives will be promoted to ensure that all residents have good access to local jobs, services and facilities, preferably by either walking or cycling. For longer trips and in rural areas where there are fewer local services and employment opportunities, public transport will be promoted. <del>By promoting travel by sustainable modes there are wider benefits to local people such as improved health and air quality.</del>	Reordering in first sentence reflects heading order. Last sentence deleted as covered by last sentence in new para 6.7

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>striketrough deleted text</del>	Reason
45	Para 6.1715	<del>Within the urban areas, bus networks are available although currently underutilised. Essex County Council will address this through a new passenger transport strategy that places emphasis on improving sustainable travel modes, i.e. creating viable public transport routes that operate smoothly and potentially have priority over private car travel, thus making public transport a more appealing method of travel.</del> <b>Essex County Council prioritises passenger transport (bus, minibus, taxi and community transport) according to the 'Getting Around in Essex Strategy'. The County Council will work in partnership with stakeholders to improve bus services and their supporting infrastructure to provide a real alternative to the private car. This will be achieved by identifying opportunities for a better bus network (routes, frequency, community based services); integrating school and commercial bus networks; the implementation of travel planning (work, business, school and health); provision of digital information measures; provision of park and ride; and supporting the growth in key commuter and inter urban routes. Conventional local bus services, and in particular improving existing services, will be an important part of promoting sustainable travel across North Essex, and will complement the new high quality rapid transit network.</b>	To update text to reflect latest strategies and to delete text covered below.
46	Para 6.4816 1 <sup>st</sup> line	Through implementation of the Essex Cycling Strategy (2016), Cycling Action Plans <del>have been</del> will be prepared <b>in all the NEAs</b> to increase cycle levels; identify safety issues; identify gaps on key routes; identify ways of closing gaps; and create better cycle connectivity to key employment areas, development zones and schools.	To update policy.
47	Titles preceding	<del>Achieving Sustainable Transport</del> <b>Policies and Delivery Mechanisms for Sustainable Transport</b> <del>Sustainable travel &amp; major new developments</del>	To better reflect contents of following paragraphs

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>striketrough deleted text</del>	Reason
	para 6.4917		
48	<del>Para 6.21</del>	<del>Proposals for major new development set out in this plan provide an opportunity to create a step change in establishing sustainable travel modes, particularly in the case of the proposed new garden communities. Management of travel demand will occur through providing retailing, jobs, services and facilities within the new communities to help reduce the need to travel, and the communities will be integrated and connected with the rest of North Essex and beyond through excellent public transport links providing a step change in sustainable travel patterns and will also reduce any adverse impact they might have on the highway network. Provision for car travel will include an emphasis on the use of new technology such as electric and ultra-low emission vehicles. Strategies for car usage will include car sharing, car clubs and appropriate car parking strategies.</del>	Covered by paras 6.4-6.7 above.
49	<del>Para 6.22</del>	<del>To maximise the use of public transport new forms of high quality rapid transit networks will be provided to connect the proposed garden communities to existing urban centres such as Colchester and Braintree; key destinations such as the University of Essex; and key transport interchanges in North Essex. To achieve the desired step change in sustainable transport this infrastructure will be identified in subsequent development plan documents and need required to be funded and provided early in the development phase to enable subsequent housing and employment delivery.</del>	Covered by paras 6.4-6.7 above.
50	<del>B. Education</del> <b>C. Social Infrastructure</b>	<del>B. Education</del> <b>C. Social Infrastructure</b>	To clarify links between education and healthcare by regrouping them

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>striketrough deleted text</del>	Reason
			under wider social infrastructure heading
51	New Para 6.21	<b>New schools are an important place-making component of Garden Communities where early provision is usually critical in providing core social infrastructure to help a new community thrive, improve social integration and support the creation of sustainable travel patterns and a healthy environment.</b>	To reflect latest Government guidance
52	Para 6.2822	<b>Local authorities have a role in creating a healthy community. The North Essex authorities will work closely with relevant stakeholders such as The</b> <del>authorities will need to work with the NHS, Public Health, and local health partnerships,</del> <b>developers and communities to ensure that future development in North Essex takes into account the need to improve health and wellbeing of local residents (and workers) including access to appropriate health and care infrastructure</b> <del>adequate provision and range of healthcare facilities to support new and growing communities. and this is</del> <b>Requirements are</b> set out in more detail within the Infrastructure Delivery Plan. This will be particularly important given the ageing profile of existing and future residents. There is already a need for more and better quality health care facilities across North Essex with some areas having relatively poor access to health care facilities. <b>Garden Communities will provide the conditions for a healthy community Health through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and which is accessible by walking and cycling and public transport.</b> <del>objectives will also be delivered through providing safe, attractive and convenient routes for walking and cycling, and maximising participation in active modes of travel. Support will be given to to meet cross-boundary need for hospice facilities.</del>	



Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
53	D. Broadband <b>Digital Connectivity</b>	D. <del>Broadband</del> <b>Digital Connectivity</b>	Update to reflect latest terminology
54	Para 6.2923	The NPPF indicates how high quality communications infrastructure is <b>essential for economic growth and social well-being</b> <del>crucial for sustainable growth</del> . The availability of high speed and reliable broadband, particularly in rural areas, is a key factor in unlocking new development opportunities and ensuring that people can access services online and work from home. <b>By 2020 the Government is introducing a broadband Universal Service Obligation, whereby everyone will have a clear, enforceable right to request high speed broadband.</b>	To update to reflect latest position on digital connectivity
55	Para 6.3024	Fast broadband connections and telecommunications are an increasingly important requirement to serve all development. New development should contribute to the creation of a comprehensive and effective network in both urban and rural areas to promote economic competitiveness and to reduce the need to travel. The priority is to secure <b>full fibre connections</b> <del>the earliest availability for universal broadband coverage and fastest connection speeds for</del> to all existing and new developments. Developers are encouraged to engage with broadband providers <b>at the earliest opportunity</b> . Where provision is possible broadband must be installed on an open access basis and which will need to <b>provide</b> <del>be directly accessed from the nearest British Telecom exchange and threaded through resistant tubing to enable easy</del> access to the fibre optic cable for future repair, replacement or upgrading.	The change provides clarification of current practice.
56	<b>New Section E Water</b>	<b>The authorities will need to work with Anglian Water, Affinity Water, Environment Agency and other infrastructure providers to ensure sufficient capacity and provision of an adequate water supply and waste water</b>	New section added to ensure a wide range of infrastructure



Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
	Communities	<ul style="list-style-type: none"> <li>• <b>Funding and route commitments for the following strategic transport infrastructure projects will need to be secured in advance of the start of the Garden Communities as follows:</b> <ul style="list-style-type: none"> <li>○ <b>Colchester/ Braintree Borders –</b> <ul style="list-style-type: none"> <li>▪ <b>A12 widening and junction improvements</b></li> <li>▪ <b>A dualled A120 from Braintree to the A12</b></li> </ul> </li> <li>○ <b>Tendring /Colchester Borders –</b> <ul style="list-style-type: none"> <li>▪ <b>A120-A133 Link road</b></li> </ul> </li> </ul> </li> <li>• <b>A scheme and specification for a phased rapid transit network and programme for the integration of the three Garden Communities into the rapid transit network</b></li> <li>• <b>Provision of appropriate sustainable travel options will be required to encourage and facilitate sustainable travel behaviour from the outset and to provide viable alternatives to single-occupancy private car use, and will be informed by masterplanning.</b></li> <li>• <b>Requirements for other strategic Garden Community infrastructure are outlined in sections D, E and F of Policies SP8, 9, and 10 and will be further set out in the Development Plan Documents for each Garden Community</b></li> </ul>	

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
59	Policy SP5 B. Transport	<p><b>B. Transportation and travel</b></p> <p><b>The authorities will work with government departments, Highways England, Essex County Council, Network Rail, rail and bus operators, developers and other partners to deliver the following :</b></p> <ul style="list-style-type: none"> <li><b>Changes in travel behaviour by applying the modal hierarchy and increasing opportunities for sustainable modes of transport that can compete effectively with private vehicles.</b></li> <li><b>A comprehensive network of segregated walking and cycling routes linking key centres of activity planned to prioritise safe, attractive and convenient routes for walking and cycling</b></li> </ul> <p><del>New and improved infrastructure required to support economic growth, strategic and site-specific priorities outlined in the second part of each Local Plan</del></p> <ul style="list-style-type: none"> <li><del>Substantially improved connectivity by promoting and enabling more sustainable travel patterns, introducing urban transport packages to increaseing transport modal choice, providing better public transport infrastructure and services, and enhanceding inter-urban transport corridors</del></li> <li><del>Increased rail capacity, reliability and punctuality; and reduced overall journey times by rail</del></li> <li><del>Support changes in travel behaviour by applying the modal hierarchy and increasing opportunities for sustainable modes of transport that can compete effectively with private vehicles</del></li> <li><b>Prioritise Improved urban and inter-urban Ppublic transport, particularly in the urban areas, including new and innovative ways of providing public transport provision including;</b></li> </ul>	To clarify transport requirements and cross-references to other policies in the plan.

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
		<ul style="list-style-type: none"> <li>○ high quality rapid transit networks and connections, in and around urban areas with links to the new Garden Communities <b>as required by policy SP5 (A) and policies SP8, 9, and 10</b></li> <li>○ maximising the use of the local rail network to serve existing communities and locations for large-scale growth</li> <li>○ a bus network <b>providing a high frequency, reliable and efficient service</b>, <del>that is high quality, reliable, simple to use,</del> integrated with other <b>transport</b> modes <b>serving</b> and offers flexibility to serve areas of new demand</li> <li>○ promoting wider use of community transport schemes</li> </ul> <ul style="list-style-type: none"> <li>• <b>Increased rail capacity, reliability and punctuality; and reduced overall journey times by rail</b></li> <li>• <b>New and improved</b> road infrastructure to help reduce congestion and improve journey time reliability along the A12, A120 and A133 <b>that will also link new development and provide</b> strategic highway connections <b>specifically: to</b> <del>improve access to markets and suppliers for business, widen employment opportunities and support growth</del></li> <li>• Improved <b>access to and capacity of</b> junctions on the A12 and other main roads to reduce congestion, <b>improve journey time reliability</b> and address safety</li> <li>• A dualled A120 between the A12 and Braintree</li> <li>• <del>A comprehensive network of segregated walking and cycling routes linking key centres of activity contributing to an attractive, safe, legible and prioritised walking/cycling environment</del></li> </ul>	

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
		<ul style="list-style-type: none"> <li>Develop Innovative strategies for the management of private car use and parking including <b>the promotion of car clubs and car sharing, and provision of support</b> for electric car charging points.</li> </ul>	

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
60	SP 5 <b>C. Social Infrastructure</b> Education Broadband	<p><b>C. Social Infrastructure</b>  <b>The authorities will work with relevant providers and developers to facilitate the delivery of a wide range of social infrastructure required for healthy, active and inclusive communities, minimising negative health and social impacts, both in avoidance and mitigation, as far as is practicable.</b></p> <p>Education</p> <ul style="list-style-type: none"> <li>• <del>Provide</del> <b>Sufficient school places will be</b> provided in the form of expanded or new primary and secondary schools together with early years and childcare facilities <b>that are phased with new development</b>, with larger developments setting aside land and/or contributing to the cost of delivering land for new schools where required.</li> <li>• <del>Facilitate and support provision of</del> <b>Practical vocational training, apprenticeships, and further and higher education will be provided and supported.</b></li> </ul> <p>Health and well-being</p> <ul style="list-style-type: none"> <li>• <del>Ensure that essential</del> <b>Healthcare infrastructure will be</b> <del>is provided as part of new developments of appropriate scale in the form of expanded or new healthcare facilities including primary and acute care; pharmacies; dental surgeries; opticians, supporting community services including hospices, treatment and counselling centres.</del></li> <li>• Require new development to maximise its positive contribution in creating healthy communities and minimise its negative health impacts, both in avoidance and mitigation, as far as is practicable.</li> <li>• <b>The conditions for a healthy community will be provided through the pattern of development, good urban design, access to local services and</b></li> </ul>	To clarify organisation of policy wording and to clarify links between provision of different types of social infrastructure and new development

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>striketrough-deleted text</del>	Reason
		<b>facilities; green open space and safe places for active play and food growing, and which are all accessible by walking, cycling and public transport.</b>	
61	D. Broadband <b>Digital Connectivity</b>	<b>D. Digital Connectivity</b> <b>Comprehensive digital access to support business and community activity will be delivered through the</b> Roll-out of <del>superfast</del> <b>ultrafast</b> broadband across North Essex to secure the earliest availability for <b>full fibre connections</b> <del>universal broadband coverage and fastest connection speeds for</del> to all existing and new developments (residential and non-residential), where all new properties allow for the provision for <del>superfast</del> <b>ultrafast</b> broadband in order to allow connection to that network as and when it is made available.	To reflect latest terminology
62	SP5 – add to end of policy new section E. Wastewater	<b>E. Water &amp; Waste water</b> <b>The authorities will work with relevant providers to ensure that there is resilient capacity in the water management and waste water systems to respond to new development and provide improvements to water infrastructure and waste water treatment and off-site drainage improvements.</b>	To ensure a wide range of infrastructure requirements is reflected.
63	Para 7.2	Networks of green and blue infrastructure should be provided across new developments, linking new developments within existing networks of open space. These areas can be multi use, providing space for natural species and habitats as well as space for informal recreation, and walking, <b>cycling and equestrian</b> links.	To clarify range of multi-use links required.



Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
64	Para 7.3 3 <sup>rd</sup> line	Strategic scale and more local green infrastructure can make a vital contribution to quality of place, biodiversity <b>gains, alleviating recreational pressure</b> , and health outcomes if properly integrated into the design and delivery of new development.	To clarify benefits of green infrastructure
65	Policy SP6	<p>All new development must meet the highest <b>high (Mod A)</b> standards of urban and architectural design. <del>The local authorities encourage the use of d</del>Development frameworks, masterplans, <b>design codes</b>, and other design guidance documents and will <b>be prepared in consultation with stakeholders where they are needed to support this objective</b>. <del>use design codes where appropriate for strategic scale development. (Mod B)</del></p> <p>All new developments should, <b>where applicable, (Mod C)</b> reflect the following <b>place shaping</b> principles:</p> <ul style="list-style-type: none"> <li>• Respond positively to local character and context to preserve and enhance the quality of existing <del>communities</del> <b>places (Mod D)</b> and their environs.</li> <li>• Provide buildings that exhibit individual architectural quality within well-considered public and private realms;</li> <li>• Protect and enhance assets of historical or natural value;</li> <li>• <b>Incorporate biodiversity creation and enhancement measures; (Mod E)</b></li> <li>• Create well-connected places that prioritise the needs of pedestrians, cyclists and public transport services above use of the private car;</li> <li>• Where <del>possible</del>, <b>appropriate</b>, provide a mix of land uses, services and densities with well-defined public and private spaces to create sustainable well-designed neighbourhoods;</li> <li>• Enhance the public realm through additional landscaping, <del>street furniture</del> and other distinctive features that help to create a sense of place; <b>(Mod F)</b></li> <li>• Provide streets and spaces that are overlooked and active and promote inclusive access;</li> </ul>	<p>Mod A – Modified to align with NPPF guidance and to suggest a proportionate design response.</p> <p>Mod B – Clarifies the use of design guidance documents</p> <p>Mod C - Clarifies not all the principles are applicable to some developments.</p> <p>Mod D - Clarifies a wider definition of areas covered by the requirement to preserve and enhance.</p> <p>Mod E - To ensure that development considers net</p>

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
		<ul style="list-style-type: none"> <li>• Include parking facilities that are well integrated as part of the overall design and are adaptable if levels of private car ownership fall;</li> <li>• Provide an integrated <b>and connected</b> network of <del>multi-functional</del> public open space and green and blue infrastructure <del>that connects with existing green infrastructure where possible,</del> <b>including alleviating recreational pressure on designated sites; (Mod G)</b></li> <li>• Include measures to promote environmental sustainability including addressing energy and water efficiency and provision of appropriate wastewater and flood mitigation measures <b>including the use of open space to provide sustainable drainage solutions; (Mod H)</b> and</li> <li>• Protect the amenity of existing and future residents and users with regard to noise, vibration, smell, loss of light, <b>overbearing</b> and overlooking. <b>(Mod I)</b></li> </ul>	<p>environmental gains, consistent with NPPF paragraph 9.</p> <p>Mod F- To provide consistent level of detail</p> <p>Mod G To strengthen the policy to ensure that new development incorporates biodiversity creation and enhancement into its design.</p> <p>Mod G – To highlight importance of alleviating recreational pressure on designated sites</p> <p>Mod H – To highlight potential for sustainable water management solutions</p>

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>striketrough deleted text</del>	Reason
			Mod I – To clarify factors affecting amenity
66	Paragraphs 8.3 – 8.7	Remove paragraph number and bullet point as sub sections of paragraph 8.3. Renummer paragraphs in rest of section as appropriate	To reflect new policy SP1B and supporting explanatory text
67	New Para 8.7	<b>Heritage Impacts – To ensure that the significance of designated and undesignated heritage assets and their settings within and adjoining development areas is conserved and where possible enhanced, the detailed nature, form and boundary of new development is to be informed by the site selection methodology set out within Historic England’s Advice Note 3 (2017) (The Historic Environment and Site Allocations in Local Plans) or any subsequent replacement. Heritage Impact Assessments will be undertaken to ensure that the detailed form of development proposals is informed by an understanding of the assets and any adverse impacts mitigated appropriately.</b>	To clarify requirements for conserving and enhancing heritage assets and their settings.
68	Para 8.141, First two sentences	<del>At least two of the three garden communities will be cross-boundary, and the continued close joint working between the authorities involved will be required to secure their successful delivery. Each of the authorities is committed to ensuring that the new garden communities are as sustainable and high quality as possible and that the infrastructure needed to support them is delivered at the right time.</del>	Duplicates the first two sentences of 8.11
69	Para 8.152	<del>Based on the partnership wording between the North Essex authorities to date and their continuing commitment to the projects, each of the three proposed garden communities is planned to deliver 2,500 dwellings during the Local Plan to 2033. Delivery of 2,500 dwellings in the cross border garden communities, no matter where they are physically built, within the Local Plan period to</del>	New mechanism added to each policy

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
		<p><del>2033 will be attributed as set out in section 2 of each of the individual Local Plans, or if more dwellings are built then 50:50 between the two districts concerned. A detailed mechanism will be developed to attribute housing completions to the local planning authorities to deal with the possibility that fewer than 2,500 dwellings are completed in any of the communities during the plan period to 2033; it will be informed by the DPD and agreed through a Memorandum of Understanding. It will take into account a range of factors including:</del></p> <p><del>The resources, including finance, committed to the partnership by the councils to support delivery of high quality garden communities and achieve the projected housing delivery in both districts;</del></p> <p><del>The wider benefits of the garden communities to the districts;</del></p> <p><del>The burdens to the infrastructure of the districts generated by communities; and</del></p> <p><del>The proportion of the housing built in each district</del></p>	
70	SP7, first section	<p>The following three new garden communities are proposed in North Essex.</p> <p>Tendring/Colchester Borders, a new garden community will deliver 2,500 homes <b>and 7 hectares of employment land</b> within the Plan period (as part of an overall total of between 7,000-9,000 homes <b>and 25 hectares of employment land</b> to be delivered beyond 2033),</p> <p>Colchester/Braintree Borders, a new garden community will deliver <del>2,500</del> <b>1,350</b> homes <b>and 4 hectares of employment land</b> within the Plan period (as part of an overall total of between 15,000 – 24,000 homes <b>and 71 hectares of employment land</b> to be delivered beyond 2033).</p>	To strengthen references to providing for employment growth

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		<p>West of Braintree in Braintree DC, a new garden community will deliver <del>2,500</del> <b>2,060</b> homes <b>and 9 hectares of employment land</b> within the Plan period (as part of an overall total of between 7,000-10,000 homes <b>and 44 hectares of employment land</b> to be delivered beyond 2033).</p> <p>Each of these will be an holistically and comprehensively planned new community with a distinct identity that responds directly to its context and is of sufficient scale to incorporate a range of homes, employment, education &amp; community facilities, green space and other uses to enable residents to meet the majority of their day-to-day needs, reducing the need for outward commuting. <b>Each new garden community will be comprehensively planned from the outset with</b> <del>Delivery of each new community will be being</del> phased <b>as part of that whole</b> and underpinned by a comprehensive package of infrastructure.</p> <p>The Councils will need to be confident, before any consent is granted, that the following requirements have been secured either in the form of appropriate public ownership, planning agreements and obligations and, if necessary a local infrastructure tariff.</p>	
71	SP7 criteria (ii)	<p>The public sector working pro-actively and collaboratively with the private sector to design, and bring forward these garden communities, deploying new models of delivery <b>where appropriate</b> <del>sharing risk and reward</del> and ensuring that the cost of achieving the following is borne by landowners and those promoting the developments: : (a) securing a high-quality of place-making, (b) ensuring the</p>	To clarify requirements for delivery models.

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		timely delivery of both on-site and off-site infrastructure required to address the impact of these new communities, and (c) providing and funding a mechanism for future stewardship, management, maintenance and renewal of community infrastructure and assets. Given the scale of and time period for development of these new garden communities, the appropriate model of delivery will <b>need to</b> secure a comprehensive approach to the delivery of each new community in order to achieve the outcomes outlined above, avoid a piecemeal approach to development, provide the funding and phasing of both development and infrastructure, and be sustainable and accountable in the long term.	
72	SP7 criteria (v)	To meet the requirements of those most in need including <b>a minimum of 30%</b> affordable housing in each garden community.	To provide consistency with wording of Garden Community policies on affordable housing in SP8, 9 and 10
73	SP7 criteria (vi)	<b>In accordance with the Garden Community Charter principle of providing one job per household within the new community or within a short distance by public transport, p</b> Provide and promote opportunities for employment within each new community and within sustainable commuting distance of it. <b>Around 850,000 square metres of floorspace will be provided in total, with allocations to be defined within Development Plan Documents for each Garden Community totalling some 138 hectares.</b>	To strengthen references to providing for employment growth and clarify process for identifying allocations
74	SP7 – criteria (xi)	Secure a smart and sustainable approach that fosters climate resilience and a 21st century environment in the design and construction of each garden community	Clarification of water measures required.

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through</del> <b>deleted text</b>	Reason
		to secure net gains in local biodiversity, highest standards of energy efficiency and innovation in technology to reduce impact of climate change, <b>the incorporation of innovative</b> water efficiency/ <b>re-use measures</b> (with the aim of being water neutral in identified areas of serious water stress), and sustainable waste and mineral management.'	
75	SP7 - Criterion (iv) of policy SP7, F17 of SP8 and F18 of policy SP9 and F18 of SP10	Add wording to end of section: <b>To ensure new development does not have an adverse effect on any European Protected sites, the required waste water treatment capacity must be available including any associated sewer connections in advance of planning consent.</b>	To provide a policy safeguard to ensure that phasing of development does not exceed capacity.
76	SP7 final paragraph	A Development Plan Document will be developed for each of the garden communities to set out <b>how they will deliver</b> the <b>above</b> principles <b>as well as further detail</b> of their design, development and phasing. <del>as well as a A</del> mechanism to appropriately distribute housing completions to the three Councils <del>and this</del> will be agreed through a Memorandum of Understanding.	To clarify role of DPDs
77	Policy SP8 First para	The adopted policies map identifies the broad location for the development of a new garden community of which the details and final number of homes <b>along with allocations supporting the delivery of B use employment space</b> will be set out in a Strategic Growth Development Plan Document to be prepared jointly between Colchester BC and Tendring DC and which will incorporate around 2,500 dwellings	To strengthen references to employment in line with Section 1 objectives

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		within the Plan period (as part of an overall total of between 7,000-9,000 homes) and provision for Gypsy and Travellers.	
78	Policy SP8 New third paragraph	<b>For the Plan period up to 2033 Tendring District Council and Colchester Borough Council agree that housing delivery from the Tendring Colchester Borders Garden Community will be distributed to the Authorities as set out in the published Local Plan trajectory, irrespective of where they are built. Should there be additional or fewer new dwellings delivered up to 2033 in the Garden Community then the number above or below the cumulative number will be distributed evenly between the Authorities. If there remains a shortage of overall delivery against need then each Authority, having taken 50% of the shortfall into account, would need to make up the shortfall within their Authority area given their overall Authority position.</b>	To clarify how the housing on cross boundary sites will be distributed
79	Policies SP8, SP9 and SP10 Para A.2.	Planning applications for this garden community will be expected to be consistent with, <b>and follow on from</b> , the approved DPDs and subsequent masterplans and design and planning guidance. <b>A Heritage Impact Assessment for each DPD in accordance with Historic England guidance will be required in order to assess impact of proposed allocations upon the historic environment, to inform the appropriate extent, nature and form of the development and establish any mitigation measures necessary.</b>	To clarify plan-making process for Garden Communities, including requirements for assessment of historic environment impacts.
80	Policy SP8, C.5. 1 <sup>st</sup> line	Provision for a wide range of job, skills and training opportunities will be created in the garden community, <b>Allocations supporting the delivery of 25 hectares of B use employment space will be defined within the Development Plan Document for the Garden Community.</b>	To clarify process for determining employment land allocations



Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
81	Policies SP8, Para D.7	<p>A package of measures will be introduced to encourage smarter transport choices to meet the needs of the new community and maximise the opportunities for sustainable travel. <b>As highlighted in Policy SP5 funding and route commitments for the following strategic transport infrastructure will be required to be in place in advance of the Tendring / Colchester Borders Garden Community starting:</b></p> <p><b>A120-A133 Link road</b></p> <p><b>A scheme and specification for a phased rapid transit network and programme for the integration of the Garden Community into the rapid transit network</b></p> <p><b>Additional transport priorities</b> including the provision of a network of footpaths, cycleways and bridleways to enhance permeability within the site and to access the adjoining areas; <del>development of of a public rapid transit system connecting the garden community to Essex University and Colchester town centre park and ride facilities and other effective integrated measures to mitigate the transport impacts of the proposed development on the strategic and local road network. Longer term transport interventions will need to be carefully designed to minimise the impacts on the strategic and local road</del> <b>transport</b> network and fully mitigate any environmental or traffic impacts arising from the development. These shall include <del>bus (or other</del> <b>public transit provisions)</b> priority measures between the site, University of Essex, Hythe station and Colchester Town Centre;</p>	To clarify requirement for essential transport infrastructure in Garden Communities.
82	Policy SP8 D.9	<p>Primary vehicular access to the site will be provided off the A120 and A133. <b>Further road improvements will be proposed as part of the masterplanning process to address both local needs and strategic movements between the A120 and A133.</b></p>	Referenced in Hearing Statement. Matter 8

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83	Policies SP8 and SP10 Para E.13 SP9 Para 14	<b>Increased P</b> primary healthcare facilities <b>capacity</b> will be provided to serve the new development <b>as appropriate. This may be by means of new infrastructure or improvement, reconfiguration, extension or relocation of existing medical facilities.</b>	Clarifies delivery options for new healthcare provision.
84	Policy SP8, Para F.17 and SP9, Para F.18	<b>The delivery of smart, innovative and sustainable water efficiency/re-use solutions that fosters climate resilience and a 21<sup>st</sup> century approach towards water supply, water and waste water treatment and flood risk management.</b> Provision of improvements to waste water treatment plant including an upgrade to the Colchester Waste Water Treatment Plan and off-site drainage improvements <b>aligned with the phasing of the development within the plan period and that proposed post 2033.</b>	Changes required for consistency with changes recommended to policy SP7.
85	Policy SP8 Para F.20,	<b>Avoidance, P</b> rotection and/or enhancement of heritage and biodiversity assets within and surrounding the site, <b>including Bullock Wood SSSI, Ardleigh Gravel Pits SSSI, Wivenhoe Pits SSSI and Upper Colne Marshes SSSI and relevant European protected sites. Contributions will be secured towards mitigation measures identified in the Essex wide Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). Wintering bird surveys will be undertaken at the appropriate time of year as part of the DPD preparation to identify any offsite functional habitat. Should any be identified, development must firstly avoid impacts. Where this is not possible, it must be phased to deliver habitat creation and management either on- or off-site to mitigate any significant impacts</b>	Additions to first sentence are to ensure the protection of SSSIs and for consistency with policies SP9 & SP10. The 2 <sup>nd</sup> sentence highlights the mitigation measures to be secured through the RAMS and the 3 <sup>rd</sup> sentence clarifies the requirement for

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			wintering bird surveys for the Tendring Colchester Borders area.
86	SP9 title (BDC version)	Colchester/Braintree <del>Boarders</del> <b>Borders</b> Garden Community	typo
87	SP9 first para	The adopted policies map identifies the broad location for the development of a new garden community of which the details and final number of homes <b>along with allocations supporting the delivery of B use employment space</b> will be set out in a Strategic Growth Development Plan Document to be prepared jointly between Colchester BC and Braintree DC and which will incorporate around <del>2,500</del> <b>1,350</b> dwellings within the Plan period (as part of an overall total of between 7,000-9,000 homes) and provision for Gypsy and Travellers.	To strengthen references to employment in line with Section 1 objectives and amend housing number
88	SP9 new third para	<b>For the Plan period up to 2033 Colchester Borough Council and Braintree District Council agree that housing delivery from the Colchester Braintree Borders Garden will be distributed to the Authorities as set out in the published Local Plan trajectory, irrespective of where they are built. Should there be additional or fewer new dwellings delivered up to 2033 in the Garden Community then the number above or below the cumulative number will be distributed evenly between the Authorities. If there remains a shortage of overall delivery against need then each Authority, having taken 50% of the shortfall into account, would need to make up the shortfall within their Authority area given their overall Authority position.</b>	To clarify how the housing on cross boundary sites will be distributed

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
89	SP9 – B3 Housing 1 <sup>st</sup> line	A mix of housing types and tenures including self- and custom-build and <b>starter homes</b> <del>affordable housing</del> will be provided on the site.	Change required for consistency with SP8 and SP10.
90	SP9 – C5 1 <sup>st</sup> line	Provision for a wide range of job, skills and training opportunities will be created in the garden community, <b>Allocations supporting the delivery of 71 hectares of B use employment space will be defined within the Development Plan Document for the Garden Community.</b>	To clarify process for determining employment land allocations
91	SP9 Para D.7. 1 <sup>st</sup> and 2 <sup>nd</sup> line	A package of measures will be introduced to encourage smarter transport choices to meet the needs of the new community and maximise the opportunities for sustainable travel. <b>As highlighted in Policy SP5 funding and route commitments for the following strategic transport infrastructure will be required to be in place in advance of the Colchester/Braintree Borders Garden Community starting:</b> <b>A12 widening and junction improvements</b> <b>A dualled A120 from Braintree to the A12</b> <b>A scheme and specification for a phased rapid transit network and programme for the integration of the Garden Communities into the rapid transit network</b> <b>Additional transport priorities</b> <del>including</del> including the provision of a network of footpaths, cycleways and bridleways to enhance permeability within the site and to access the adjoining area; development of a public rapid transit system connecting this new garden community to the wider Colchester context; development of opportunities to improve accessibility to Marks Tey rail station (or provide for its relocation to a more central location within the garden community); and effective measures to mitigate the transport impacts of the proposed development on the strategic and local road network.	To clarify requirement for essential transport infrastructure in Garden Communities

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
92	SP9 Para D.11	Opportunities will be explored to establish how Marks Tey rail station can be made more accessible to residents of the new community including <del>relocation of the station to a more central location and</del> improvement of walking, cycling and public transport links to the station.	To reflect latest masterplanning approach
93	SP9 Para F. 21	<b>Avoidance</b> , Pprotection and/or enhancement of heritage and biodiversity assets within and surrounding the site including the SSSI at Marks Tey brick pit, Marks Tey Hall, Easthorpe Hall Farm, Easthorpe Hall and the habitats along and adjoining the Domsey Brook and Roman River corridors. <b>Contributions will be secured towards mitigation measures identified in the Essex wide Recreational Disturbance Avoidance and Mitigation Strategy (RAMS).</b>	The addition of the word 'avoidance' reflects the ecological mitigation hierarchy. The 2 <sup>nd</sup> sentence highlights the mitigation measures to be secured through the RAMS
94	SP10 1 <sup>st</sup> Para	The adopted policies map identifies the broad location for the development of a new garden community of which the details and final number of homes <b>along with allocations supporting the delivery of B use employment space</b> will be set out in a Strategic Growth Development Plan Document to be prepared jointly between Braintree DC and Uttlesford DC if applicable and which will incorporate around <del>2,500</del> <b>2,060</b> dwellings within the Plan period (as part of an overall total of between 7,000-9,000 homes) and provision for Gypsy and Travellers.	To strengthen references to employment in line with Section 1 objectives and amend housing number.
95	SP10 new 4 <sup>th</sup> para	<b>Within the Plan period completions in a given year will be assigned to BDC and UDC in line with the trajectory contained within the Local Plans regardless of where dwellings are built in the Garden Community.</b> <ul style="list-style-type: none"> <li><b>Within the Plan period if the site over delivers on housing in a given year then that over delivery will be split 75% BDC and 25% UDC regardless of where the dwellings are built in the Garden Community</b></li> </ul>	To clarify how the housing on cross boundary sites will be distributed

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
		<ul style="list-style-type: none"> <li>• <b>Within the Plan period if the site under delivers on housing in a given year the number of homes delivered will be split 75% BDC and 25% UDC regardless of where there are built in the Garden Community.</b></li> <li>• <b>Any completions in 2023/24 and 2024/25 will be wholly assigned to BDC.</b></li> <li>• <b>The total number of dwellings assigned to UDC will not exceed 3,500, or any subsequent figure for dwellings in Uttlesford defined in the West of Braintree DPD. The total number of dwellings assigned to BDC will not exceed 10,000, or any subsequent figure for dwellings defined in the West of Braintree DPD. This will not artificially constrain the DPD in identifying the capacity of the site, the capacity of the site will be design-led and defined through the DPD and subsequent planning applications.</b></li> </ul>	
96	SP10 Para C.5 1 <sup>st</sup> line	<p><del>Employment – additional wording pending further evidence base findings.</del></p> <p><del>Provision for a wide range of job, skills and training opportunities will be created in the garden community,</del> <b>Allocations supporting the delivery of 44 hectares of B use employment space will be defined within the Development Plan Document for the Garden Community.</b></p>	typo and to clarify process for determining employment land allocations
97	Policy SP10 Para F.17	<p><b>The delivery of smart, innovative and sustainable water efficiency/re-use solutions that fosters climate resilience and a 21<sup>st</sup> century approach towards water supply, water and waste water treatment and flood risk management.</b></p> <p><del>Provision of improvements to waste water treatment and off-site drainage improvements</del> <b>aligned with the phasing of the development within the plan period and that proposed post-2033.</b></p>	Change required for consistency with changes recommended to policy SP7.

Ref	Policy / Para	Amendment <b>Bold new text</b> <del>strike through deleted text</del>	Reason
98	Policy SP10 F.20	<b>Avoidance, P</b> rotection and/or enhancement of heritage and biodiversity assets within and surrounding the site including Great Saling Hall conservation area and areas of deciduous woodland within and adjoining the site. <b>Contributions will be secured toward mitigation measures identified in the Essex wide Recreational disturbance Avoidance and Mitigation Strategy (RAMS).</b>	The addition of the word 'avoidance' reflects the ecological mitigation hierarchy. The 2 <sup>nd</sup> sentence highlights the mitigation measures to be secured through the RAMS
99	Paragraph 9.4 Table 1	<i>Amend as shown in Appendix 1 to this document</i>	To provide clarity
100	Addition to Glossary in section 2 Plans	<b>Blue Infrastructure – Water assets and features including rivers, streams, estuaries, ponds, culverts, and the North Sea which deliver a wide range of environmental and quality of life benefits for local communities and wildlife.</b>	To ensure the definition of the term is made clear.

## Appendix 1

### Revisions to address clarity

9.4 Table 1 Monitoring Requirements for Section1

<b>Part One Objectives</b>	<b>Part One Policies</b>	<b>Targets</b>	<b>Key Indicators in Authority Monitoring Reports</b>
Providing sufficient new homes	SP1 Presumption in favour of Sustainable Development	Delivery of new development in accordance with the Development Plan	Record of planning decisions including appeals
Fostering economic development	SP2 Spatial Strategy for North Essex	Deliver Garden Communities as the most sustainable options for large scale, long term growth	Local authority agreement and delivery of governance, community involvement, stewardship arrangements and funding arrangements for Garden Communities
Providing new and improved infrastructure			
Addressing education and healthcare needs	SP3 Meeting Housing Needs	Deliver new housing in line with spatial strategy and Objectively Assessed Need targets	Market and affordable housing completions per annum (net)
Ensuring high quality outcomes			



	SP4 Providing for Employment	Deliver new employment land in line with spatial strategy and evidence base targets	Amount of floorspace development for employment and leisure by type.
	SP5 Infrastructure and Connectivity	<p>Delivery of identified infrastructure schemes including transport, education, community, healthcare, green/blue infrastructure and environmental protection</p> <p>Increase modal share of non-motorised transport.</p>	<p>Identify and monitor progress of strategic infrastructure projects</p> <p>Monitor modal splits and self-containment via Census and measure traffic levels on key routes</p>

	SP5 Place Shaping Principles	Approved DPDS, masterplans & other planning & design guidance in place for each community prior to the commencement of development it relates to	Monitor availability of DPDs and other planning guidance relative to the submission & determination of planning applications for the development it relates to
	SP7 Garden Communities	Deliver Garden Communities as the most sustainable options for large scale, long term growth	Local authority agreement and delivery of governance, community involvement, stewardship arrangements and funding arrangements for Garden Communities
	SP8 Tendring Colchester Borders Garden Community	Deliver sustainable new communities in accordance with guidance as adopted	Delivery rates of all development including supporting infrastructure as documented in

			housing trajectories and other monitoring data
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## Appendix 2

(to be inserted as Appendix 1 to Section 1)

### Recreational Pressures at Essex/Suffolk European Sites

European site	Recreational Pressure
Abberton Reservoir SPA/Ramsar	Recreational disturbance not a threat at this
Blackwater Estuary SPA/Ramsar	The key threat to this site relates primarily to disturbance of water birds from people and dogs, in addition to water sports such as use of jet skis and motorboats.
Colne Estuary SPA/Ramsar	The key threat to this site relates primarily to disturbance of water birds from people and dogs, in addition to water sports such as use of jet skis and motorboats.
Hamford Water SPA/Ramsar	The key recreational threat identified at the screening stage relates primarily to disturbance of water birds from people and dogs in addition to water sports such as use of jet skis and motorboats.
Stour and Orwell Estuaries SPA/Ramsar	Breeding and overwintering waterbirds are susceptible to human disturbance from a range of land and water-based activities, including boating and watersports; walking; bait-digging; fishing; wildfowling, and military overflight training. Some activities, such as powerboating, may produce physical disturbance to habitats.

Essex Estuaries SAC	The SAC is vulnerable to physical damage which can be caused by trampling and erosion associated with terrestrial recreation and wave damage caused by water based recreation. The SAC is also vulnerable to the effects of other negative factors associated with recreation such as littering, fire and vandalism.
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## Appendix 3

### List of Superseded Policies – Colchester and Tendring

#### Colchester

List of Colchester Policies- Core Strategy Focussed Review Version (July 2014) / Site Allocations Adopted October 2010 /  
Development Policies Focussed Review Version (July 2014) - Superseded by the Colchester Local Plan 2013-2033

<b>New Policy Number</b>	<b>Policy ref on 2017-2033 Local Plan</b>	<b>Replaces Policy</b>
<b>SP1</b>	Presumption in Favour of Sustainable Development	SD1
<b>SP2</b>	Spatial Strategy for North Essex	H1
<b>SP3</b>	Meeting Housing Needs	H1
<b>SP4</b>	Providing for Employment	CE1
<b>SP5</b>	Infrastructure and Connectivity	SD2
<b>SP6</b>	Place Shaping Principles	-
<b>SP7</b>	Development and Delivery of New Garden -Communities in North Essex	-
<b>SP8</b>	Tendring/Colchester Borders Garden Community	-

<b>SP9</b>	Colchester/Braintree Borders Garden Community	-
<b>SP10</b>	West of Braintree New Garden Community	-
<b>SG1</b>	Colchester's Spatial Strategy	H1
<b>SG2</b>	Housing Delivery	H1
<b>SG3</b>	Economic Growth Provision	CE3 /DP5
<b>SG4</b>	Local Economic Areas	CE3 / DP5
<b>SG5</b>	Centre Hierarchy	CE1
<b>SG6</b>	Town Centre Uses	DP6
<b>SG6a</b>	Local Centres	CE2c / DP7
<b>SG7</b>	Infrastructure Delivery and Impact Mitigation	SD2 / SD3
<b>SG8</b>	Neighbourhood Plan	ENV2
<b>ENV1</b>	Environment	ENV1/ DP 21
<b>ENV2</b>	Coastal Areas	ENV1 / DP23
<b>ENV3</b>	Green Infrastructure	ENV1/ PR1
<b>ENV4</b>	Dedham Vale Area of Outstanding Natural Beauty	ENV1 / DP22

<b>ENV5</b>	Pollution and Contaminated Land	-
<b>CC1</b>	Climate Change	ER1
<b>PP1</b>	Generic Infrastructure and Mitigation Requirements	DP3
<b>TC1</b>	Town Centre Policy and Hierarchy	CE1
<b>TC2</b>	Retail Frontages	DP6
<b>TC3</b>	Town Centre allocations	SA TC1
<b>TC4</b>	Transport in Colchester Town centre	TA4 / DP18
<b>NC1</b>	North Colchester and Severalls Strategic Economic Areas	CE1/ SA NGA1/ SA NGA3
<b>NC2</b>	North Station Special Policy Area	SA TC1
<b>NC3</b>	North Colchester	-
<b>NC4</b>	Transport in North Colchester	TA4 / DP18
<b>SC1</b>	South Colchester Allocations	CE3*
<b>SC2</b>	Middlewick Ranges	-
<b>SC3</b>	Transport in South Colchester	TA4 / DP18
<b>EC1</b>	Knowledge gateway and University of Essex Strategic Economic Area	CE1/ SA EC7



<b>EC2</b>	East Colchester / Hythe Special Policy Area	SA EC2/ SA EC3 Area 1/ SA EC4 Area 2/ SA EC6 Area 4
<b>EC3</b>	East Colchester	SA H1/ SA EC1/ SA EC5 Area 3/ CE3
<b>EC4</b>	Transport in East Colchester	TA4 / DP18. SA EC8
<b>WC1</b>	Stanway Strategic Economic Area	CE1/ SA STA1/ SA STA3
<b>WC2</b>	Stanway	SA STA1/ SA STA5
<b>WC3</b>	Colchester Zoo	-
<b>WC4</b>	West Colchester	-
<b>WC5</b>	Transport in Colchester	TA4 /DP18/ SA STA4
<b>SS1</b>	Abberton and Langenhoe	CE3*
<b>SS2</b>	Boxted	-
<b>SS3</b>	Chappel and Wakes Colne	-
<b>SS4</b>	Copford	-
<b>SS5</b>	Eight Ash Green	-
<b>SS6</b>	Fordham	-
<b>SS7</b>	Great Horkesley	CE3*
<b>SS8</b>	Great Tey	CE3*

<b>SS9</b>	Langham	CE3*
<b>SS10</b>	Layer de La Haye	-
<b>SS11</b>	Marks Tey	CE3*
<b>SS12a</b>	West Mersea	-
<b>SS12b</b>	Coast Road West Mersea	DP23
<b>SS12c</b>	Mersea Island Caravan Parks	DP10/ DP21/ DP23
<b>SS13</b>	Rowhedge	-
<b>SS14</b>	Tiptree	SA TIP2
<b>SS15</b>	West Bergholt	-
<b>SS16</b>	Wivenhoe	-
<b>OV1</b>	Development in Other Villages	ENV2
<b>OV2</b>	Countryside	ENV2 / DP9
<b>DM1</b>	Health and Wellbeing	DP2
<b>DM2</b>	Community Facilities	DP4
<b>DM3</b>	Education Provision	SD3
<b>DM4</b>	Sports Provision	DP15
<b>DM5</b>	Tourism, leisure, Culture and Heritage	DP10

<b>DM6</b>	Economic Development in Rural Areas and the Countryside	DP5 / DP9
<b>DM7</b>	Agricultural Development and Diversification	DP8
<b>DM8</b>	Affordable Housing	H4
<b>DM9</b>	Development Density	H2
<b>DM10</b>	Housing Diversity	H3
<b>DM11</b>	Gypsies, Travellers and Travelling Showpeople	H5/ SA H2
<b>DM12</b>	Housing Standards	DP12
<b>DM13</b>	Domestic Development	DP11/ DP13
<b>DM14</b>	Rural Workers Dwellings	H6
<b>DM15</b>	Design and Amenity	UR2 /DP1
<b>DM16</b>	Historic Environment	UR2 /DP14
<b>DM17</b>	Retention of Open Space	DP15
<b>DM18</b>	Provision of Open Space and Recreation Facilities	PR1/ PR2/ DP16
<b>DM19</b>	Private Amenity Space	DP16

<b>DM20</b>	Promoting Sustainable Transport and Changing Travel behaviour	TA1 / TA2 / TA3 / DP17
<b>DM21</b>	Sustainable Access to development	PR2 / TA2 / DP17
<b>DM22</b>	Parking	TA5 / DP19
<b>DM23</b>	Flood Risk and Water Management	ENV1/ DP20
<b>DM24</b>	Sustainable Urban Drainage Systems	DP20
<b>DM25</b>	Renewable Energy, Water Waste and Recycling	ER1 / DP25

\* Please note that the housing allocation elements of the policy are new and do not supersede adopted policies. However, these policies include reference to Local Employment Areas and this part of the policy supersedes adopted policy CE

Tendring

List of Tendring Policies - Tendring District Local Plan (2007) superseded by the Tendring District Local Plan 2013-2033

<b>New Policy Number</b>	<b>Policy ref on 2013-2033 Local Plan</b>	<b>Replaces Policy</b>
<b>SP1</b>	Presumption in Favour of Sustainable Development	-
<b>SP2</b>	Spatial Strategy for North Essex	QL1
<b>SP3</b>	Meeting Housing Needs	HG1

<b>SP4</b>	Providing for Employment	QL4
<b>SP5</b>	Infrastructure and Connectivity	-
<b>SP6</b>	Place Shaping Principles	QL8 / QL9 / QL10 / QL11
<b>SP7</b>	Development and Delivery of New Garden Communities in North Essex	-
<b>SP8</b>	Tendring/Colchester Borders Garden Community	-
<b>SP9</b>	Colchester/Braintree Borders Garden Community	-
<b>SP10</b>	West of Braintree New Garden Community	-
<b>SPL1</b>	Managing Growth	QL1 / RA4
<b>SPL2</b>	Settlement Development Boundaries	QL1 / HG3 / HG12 / HG16 / HG20 / HG21
<b>SPL3</b>	Sustainable Design	QL9 / QL10 / QL11 / ER39 / ER40 / EN12 / HG3 / HG11 / COM19 / COM20 / COM21 / COM22 / COM23 / COM34
<b>HP1</b>	Improving Health and Wellbeing	QL12 / COM2 / COM24

<b>HP2</b>	Community Facilities	COM3 / COM4 / FW3 / RA6
<b>HP3</b>	Green Infrastructure	COM6 / COM7 / COM7a / COM8a / COM9 / COM13 / COM25
<b>HP4</b>	Safeguarded Local Greenspace	COM7 / COM7a / COM9 / COM13 / COM25
<b>HP5</b>	Open Space, Sports and Recreation Facilities	COM4 / COM6 / COM8 / COM8a / OM9 / COM10 / COM11
<b>LP1</b>	Housing Supply	HG1
<b>LP2</b>	Housing Choice	HG3a / HG6
<b>LP3</b>	Housing Density and Standards	HG7
<b>LP4</b>	Housing Layout	HG3 / HG9 / HG14
<b>LP5</b>	Affordable and Council Housing	HG4
<b>LP6</b>	Rural Exception Sites	HG5
<b>LP7</b>	Self-Build and Custom-Built Homes	-
<b>LP8</b>	Backland Residential Development	HG13
<b>LP9</b>	Traveller Sites	HG22

<b>LP10</b>	Care, Independent Assisted Living	COM5
<b>LP11</b>	HMO and Bedsits	HG10
<b>PP1</b>	New Retail Development	ER31 / ER32 / ER32a / ER37 / CL7 / CL10
<b>PP2</b>	Retail Hierarchy	ER31
<b>PP3</b>	Village and Neighbourhood Centres	ER31
<b>PP4</b>	Local Impact Threshold	ER31 / ER32 / ER32a / ER37
<b>PP5</b>	Town Centre Uses	ER31 / ER32 / ER32a / ER33 / ER37 / ER40 / CL9
<b>PP6</b>	Employment Sites	ER3 / ER4 / ER5 / ER7 / ER13 / RA1
<b>PP7</b>	Employment Allocations	QL4 / QL5 / ER1 / ER2 / ER5 / ER7 / ER13
<b>PP8</b>	Tourism	ER16 / ER26 / ER27 / ER28 / ER29 / COM15 / COM15a / CL2 / CL3 / CL4 / CL5 / HAR8 / FW1 / FW2 /
<b>PP9</b>	Hotels and Guesthouses	ER24 / ER25 / ER26

<b>PP10</b>	Camping and Touring Caravan Sites	CE1/ SA EC7
<b>PP11</b>	Holiday Parks	ER18 / ER19 / ER19a / ER20 / ER22
<b>PP12</b>	Improving Education and Skills	QL12 / COM26
<b>PP13</b>	The Rural Economy	QL7 / ER10 / ER11 / ER38 / HG17 / HG18/ HG19 / RA8 / COM12
<b>PP14</b>	Priority Areas for Regeneration	QL6 / ER30 / CL8 / CL10 / CL19 / HAR4a / HAR10 / HAR12 / HAR13 / HAR14 / HAR15 / RA2
<b>PPL1</b>	Development and Flood Risk	QL3 / COM32 / COM33 / COM35
<b>PPL2</b>	Coastal Protection Belt	EN3
<b>PPL3</b>	The Rural Landscape	EN1 / EN5 / EN5a
<b>PPL4</b>	Biodiversity and Geodiversity	COM16 / EN6 / EN6a / EN6b / EN11a / EN11b / EN11c
<b>PPL5</b>	Water Conservation, Drainage and Sewerage	COM31a / EN13
<b>PPL6</b>	Strategic Green Gaps	EN2



<b>PPL7</b>	Archaeology	EN29 / EN30
<b>PPL8</b>	Conservation Areas	EN17 / EN18 / EN18a / EN20 / EN25
<b>PPL9</b>	Listed Buildings	EN21 / EN22 / EN23 / EN24 / EN25 / EN26
<b>PPL10</b>	Renewable Energy Generation	EN13a
<b>PPL11</b>	The Avenues Area of Special Character, Frinton-on-Sea	FW5 / FW6
<b>PPL12</b>	The Gardens Area of Special Character, Clacton-on-Sea	CL17
<b>PPL13</b>	Ardleigh Reservoir Catchment Area	COM18
<b>PPL14</b>	Safeguarding of Civil Technical Sltet, North East of Little Clacon/South of Thorpe-le-Soken	COM28
<b>PPL15</b>	Safeguarding of Hazardous Substance Site, South East of Great Oakley/South West of Harwich	-
<b>CP1</b>	Sustainable Transport and Accessibility	QL2 / COM1 / TR1a / TR1 / TR2 / TR3a / TR4 / TR5 / TR6 / TR7 / TR9 / TR10 /CP1

<b>CP2</b>	Improving the Transport Network	QL2
<b>CP3</b>	Improving the Telecommunications Network	COM27
<b>SAMU1</b>	Development at EDME Maltings, Mistley	LMM1 / LMM1a
<b>SAMU2</b>	Development at Hartley Gardens, Clacton	-
<b>SAMU3</b>	Development at Oakwood Park, Clacton	-
<b>SAMU4</b>	Development at Rouses Farm, Jaywick Lane, Clacton	-
<b>SAMU5</b>	Development South of Thorpe Road, Weeley	-
<b>SAH1</b>	Development at Greenfield Farm, Dovercourt	-
<b>SAH2</b>	Development Low Road, Dovercourt	-
<b>SAH3</b>	Development Robinson Road, Brightlingsea	-
<b>SAE1</b>	Carless Extension, Harwich	HAR3
<b>SAE2</b>	Land South of Long Road, Mistley	-

<b>SAE3</b>	Lanswood Park, Elmstead Market	-
<b>SAE4</b>	Mercedes Site, Bathside Bay	-
<b>SAE5</b>	Development at Mistley Port	LMM1 / LMM1a
<b>SAE6</b>	Development at Mistley Marine	LMM1 / LMM1a
<b>SAE7</b>	Stanton Europark	ER1
<b>DI1</b>	Infrastructure Delivery and Impact Mitigation	QL12 / COM29 / COM30 / COM31 /
	Other policies superseded by the 2013-2033 Local Plan but not specifically replaced or replicated.	EN4 / EN7 / EN27 / EN27a / TR8 / TR10a / CL14 / CL14a / CL15 / CL15a / CL16 / CL18 / CL21 / HAR1 / HAR2 / HAR3a / HAR6 / HAR11 / HAR16 / HAR17 / BR1 / BR2 / BR3 / BR 4 / BR5 / LMM2 / RA3 /





