



DECEMBER
2017

Hearing Statement

North Essex Authorities Local Plan Section 1 EiP

Iceni Projects Limited on behalf of
G120, Cirrus and L&Q

December 2017

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ON BEHALF OF G120,
CIRRUS AND L&Q

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Hearing Statement
NORTH ESSEX AUTHORITIES LOCAL PLAN SECTION
1 EiP

CONTENTS

0.	INTRODUCTION.....	1
1.	MATTER 1: LEGAL AND PROCEDURAL REQUIREMENTS.....	4
2.	MATTER 2: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT	6
3.	MATTER 3: MEETING HOUSING NEEDS.....	7
4.	MATTER 4: PROVIDNG FOR EMPLOYMENT	8
5.	MATTER 5: INFRASTRUCTURE AND CONNECTIVITY.....	10
6.	MATTER 6: THE PROPOSED NEW GARDEN COMMUNITIES	11
7.	MATTER 7: THE SPATIAL STRATEGY FOR NORTH ESSEX	18
8.	MATTER 8: THE PROPOSED NEW GARDEN COMMUNITIES – SPECIFIC MATTERS.....	19

0. INTRODUCTION

- 0.1 This statement has been prepared on behalf of (Gateway 120 (“G120”), Cirrus Land Limited (“Cirrus”) and L&Q New Homes Limited (“L&Q”) who together form) the Delivery Partners for the Colchester Braintree Borders Garden Community.
- 0.2 For the submitted Local Plan, representations (Colchester Borough Council representation numbers S1.110/ 7119 and S1.110/ 7120. Braintree District Council representation number S1185/ 522) have been duly made to all Local Plan consultations. These representations must be read in the context of, and in conjunction with, these earlier representations.
- 0.3 A range of technical reports have been produced to provide further information regarding detail and structure as to the feasibility work that is being undertaken. These include:
- Ecology Surveys;
 - Cultural Heritage Assessment;
 - Landscape Appraisal;
 - Initial Transport Strategy;
 - Mass Rapid Transport Note;
 - Infrastructure Delivery Report (Utilities);
 - Community Infrastructure Audit;
 - Viability Modelling; and
 - Design Delivery Report.
- 0.4 Where appropriate, executive summaries have been provided for each of above.
- 0.5 Together, this helps demonstrate land within our control as available, suitable and achievable to meet the needs of Policy SP9, and in turn contribute to the deliverability of the Plan. These are available to the Inspector at request if deemed necessary.
- 0.6 We note and approve of the scope of examination per pages 6-8 of the ‘Inspector’s Initial Observations and Questions’ and ‘Guidance Note’. In addition, we wish to emphasise the importance of focusing discussion to the deliverability of the Plan within its stated period i.e. 2017-2033.

- 0.7 Garden communities provide a unique opportunity to implement strategic planning principles well beyond a typical plan period, including that of the examination Plan. As stated throughout our earlier representations, the Delivery Partners have the means, and resolve, to deliver a comprehensive Garden Community over the entire lifetime of the development. However, for the purposes of the examination, we have sought to demonstrate the deliverability of a minimum of 2,500 dwellings by 2033, set within the wider principles detailed within Policies SP1-SP10, helping to meet the vision and strategic objectives for North Essex.
- 0.8 In this light, we wish to reference the ‘St Modwen’ Court of Appeal decision (Ref: St Modwen v SSCLG & ERYC [2017] EWCA Civ 1643), dated 20 October 2017. The decision is significant and relevant in considering the meaning of the phrase “deliverable” in the context of the NPPF. In giving the decision, LJ Lindblom stated that to be deliverable, a site has to be capable of being delivered but does not need to be certain or probable that the site actually will be delivered. Whilst the matter of this case was in reference to Paragraph 47 of the NPPF for the purposes of five year housing land supply, this definition will be equally applicable to Paragraphs 173, 177, and 182.
- 0.9 Notwithstanding this, the Delivery Partners are prepared to proceed to the submission of a first phase scheme to deliver a minimum of 2,500 dwellings. Again, we refer you to our prior representations in supporting the principle of working closely with the Councils in both the design development and delivery of the Garden Community from its outset.
- 0.10 The Delivery Partners together form a single promotion and delivery partnership covered by a promotion agreement encompassing circa 980ha of land within the Colchester Braintree Borders Garden Community.
- 0.11 The Delivery Partners have worked closely with the Councils throughout the promotion of the site and production of the Local Plan, a commitment remains to continue this joint working throughout the design and delivery of the Site.
- 0.12 The new Garden Community at West Tey is a long term project the delivery of which requires large scale long term capital commitment.
- 0.13 L&Q has the financial strength to provide the level and scale of funding that will be required. The 2017 Financial Statement states net assets at £10.8 billion. There is a committed development facility of £2.6 billion.
- 0.14 L&Q is committed to the delivery of the New Garden Community at West Tey. While it is right that a range of funding options should be considered it may be that the most advantageous financial arrangements for the project, and for the Councils, can be provided by London and Quadrant.

0.15 Within our submission, reference is made to the potential delivery model for the Colchester Braintree Borders Garden Community. The crux of this model is the creation of a 'master-developer' responsible for overseeing the delivery of the site. The make-up of this master-developer has the potential to take many forms. Whilst there is a commitment for a suitable agreement to be reached with the Councils to jointly bring forward the proposals, L&Q has the ability to bring the proposals forward in isolation if required.

1. MATTER 1: LEGAL AND PROCEDURAL REQUIREMENTS

Questions 1

- 1.1 The Delivery Partners wish to echo the sentiments of Lord Kerslake within his Peer Review¹ in supporting the collaborative approach that has been taken by the four Councils.

Question 9 and 10

- 1.2 The Delivery Partners have maintained a clear and sustained support for the inclusion of garden communities at the heart of the vision for North Essex. This has been reflected in each of our submitted representations to-date, earlier submissions to adopted Local Plan documents, and throughout the 20 year promotion of the concept to address some of the key issues of the region through the delivery of a comprehensively planned garden community.
- 1.3 The delivery of garden communities is supported in principle by the Government. The Councils have coordinated their Local Plan production alongside successful submissions to the DCLG Locally-Led Garden Villages, Towns and Cities Prospectus².
- 1.4 The Councils' Vision sits side-by-side with its Strategic Objectives in seeking to align the recognised housing and economic growth in conjunction with necessary infrastructure. Garden communities provide the opportunity for comprehensively planned development to meet these objectives.
- 1.5 They are not just about achieving housing numbers, they provide the opportunity to create environments which serve and improve all aspects of peoples' lives. These benefits go beyond just the proposed site boundaries with existing residents across the region benefiting from the range of amenities provided.
- 1.6 This long-term strategic thinking sets the platform for a sustained pipeline of sustainable development beyond that of the Plan period. This vision, which filters into the Plan making is undoubtedly positively prepared, justified and effective in meeting its strategic objectives and

¹ EB009 North Essex Garden Communities Peer Review January 2017 [Page 4]

² Locally-Led Garden Villages, Towns and Cities March 2016

addressing key issues across the region, and consistent with national policy through spearheading a new wave of garden communities³ and delivering sustainable development.

³ Fixing our broken housing market - DCLG Housing White Paper February 2017 | Garden cities, towns and villages - House of Commons Briefing Paper July 2017 | NPPF Paragraph 52

2. MATTER 2: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

Question 4

- 2.1 Place-making is essential to the success of all development across North Essex and the Councils have set a commendable aspiration to ensure high quality environments are created.
- 2.2 The proposed garden communities of the Section 1 Plan provide an opportunity for best practice to be implemented in both strategic masterplanning and detailed architecture. However, it is important policies do not place onerous restrictions on development, nor are made overly subjective as to place unnecessary risk to delivery.
- 2.3 The Councils should consider the rewording of this policy to more closely reflect that of their respective Section 2 Local Plan design policies in seeking a “high standard” of design.

Question 5

- 2.4 The reference made by the Councils within Policy SP6 is for the use of Design Codes ‘where appropriate for strategic scale developments’. The Delivery Partners support this approach subject to their use being justified and correctly applied.
- 2.5 Good design, and a good Design Code will begin with a thorough understanding of the landscape that informs the quality and character of the places and spaces created, and provides them with a unique sense of identity. Using the baseline of site specific context, ‘character areas’ can be formed within a Design Code (particularly on developments of the scale of garden communities). These will create unique environments within each local centre of the site.

3. MATTER 3: MEETING HOUSING NEEDS

Questions 1 – 7

- 3.1 The Delivery Partners has encouraged the Councils to maintain a robust and up-to-date evidence base in support of their Local Plan, particularly in relation to housing need. This reflects Paragraph 1.15 of the PINS procedural practice guidance regard evidence base documents relating to retail, employment & housing. It is our belief the Councils have satisfied this need.
- 3.2 We consider that it is pertinent to highlight the unique offer that garden communities will provide. Whilst they have an important role in helping to meet the objectively assessed need of North Essex, their role extends to the national stage, seeking to deliver strategic Government objectives in respect of accelerated housing and economic growth that can only be provided through a garden community proposal.
- 3.3 Furthermore, the Local Plan sets a platform for delivery beyond the Local Plan period and provides sufficient flexibility to bring forward further sites to address shortfalls either relating to garden communities or elsewhere.
- 3.4 This notion is promoted within the DCLG Garden Village Town and City prospectus which encourages working with local authorities with both a good track record of housing delivery and those who are prepared to commit to delivery over and above their objectively assessed housing need through the delivery of garden communities.
- 3.5 Accordingly, the justification of the Councils in pursuing the delivery of three new garden communities is not intrinsically linked need assessment and the associated housing targets which have been bought forward into the Plan.

4. MATTER 4: PROVIDING FOR EMPLOYMENT

Question 5 – 7

- 4.1 Given the uncertainties around economic projections, including flexibility to targeted employment provision is an essential requirement.
- 4.2 Nationally, policy places a strong emphasis on achieving sustainable development whereby economic, social and environmental gains are sought simultaneously. There is a clear objective to proactively drive and support economic development and attract trade and investment to build a strong, more productive, competitive economy.
- 4.3 There is a clear focus at a regional level on generating employment and pursuing growth in higher value sectors such as advanced manufacturing, low carbon and renewables, logistics, life sciences and healthcare, and digital, cultural and creative. Growth is expected to centre on 12 transport growth corridors/area across the South East LEP area and includes the A120 Haven Gateway.
- 4.4 These aspirations are reflected at a County and local level where the economic plans seek to achieve job growth, increase output and productivity but also look to ensure the supporting infrastructure is provided through improvements to broadband, increased house building and increased skills among the resident workforce.
- 4.5 The North Essex Garden Communities Charter seeks to provide access to one job per household within the new communities or within a short distance by public transport. This will be achieved by maximising the sub-regional opportunity, attracting investment and active job creation, a diverse community and range of jobs, creating a quality employment environment, embracing new technology and changing employment practices and sustainable transport access.
- 4.6 This level of ambition is matched by the Delivery Partners who remain confident in the ability of the site to deliver considerable job generation to meet the one job to every home ambition, as well as delivering significantly greater jobs within the Plan period. This includes the potential for the delivery of a 100 acre business park within initial phasing.
- 4.7 This potential significant reservoir site, located on the strategic connection of the A120 and A12, with the additional access to the Great Eastern Mainline provides sufficient flexibility to adapt to unseen changes in economic circumstance and employment land demand.
- 4.8 The planning system is focussed on the allocation employment land for B class uses however, a significant proportion of jobs in a local economy do not fall within the B class sectors. Increasingly,

as a result of economic restructuring and the expansion of sectors that do not fall within the B classes there is a need to take account of non-B class jobs.

Question 8

- 4.9 Whilst we do not wish to comment on the necessity of detailing retail floorspace requirement within the wording of Policy SP4, it should emphasise the role of garden communities within the regional network.
- 4.10 The Delivery Partners has undertaken initial indicative phasing requirements⁴ in order to inform the work undertaken within the Design Delivery Report. This work includes a market share analysis, appreciation of committed schemes, existing and anticipated demographics and an assessment against successful comparable towns at each various benchmarks of the garden community evolution.
- 4.11 This modelling projects not only the overall anticipated demand, but the broad mix of offer that is likely achievable at each benchmark.
- 4.12 Again, the garden community model allows for flexibility to be built in to the evolution of the community. Space within the town centre will be required to be safeguarded or adaptable over time to accommodate a growing demand as the population grows. Should demand change, these spaces can be adapted to an alternative use.
- 4.13 Accordingly, the Councils should be comfortable the proposed garden communities provide them with sufficient flexibility to meet their retail needs within the Plan period and beyond.

⁴ Retail & Leisure Property Development Initial Advice for West Tey Garden Community – Savills – December 2017

5. MATTER 5: INFRASTRUCTURE AND CONNECTIVITY

Questions 2 – 5

- 5.1 The strategic priorities for infrastructure listed within Policy SP5 demonstrates the significance of the garden community model in delivering the strategic objectives of the region.
- 5.2 The historic promotion of the West Tey site has been linked with the desire to help facilitate the upgrade the A120 from Braintree to Marks Tey.
- 5.3 Government funding for the upgrade to the A12 is committed within RIS1, and a bid to RIS2 is targeted for the upgrade to the A120. However, the delivery of a garden community at this interchange provides a platform for, and leaves the potential of the community to, help facilitate the delivery of these major infrastructure projects.
- 5.4 It should be noted, technical evidence⁵ produced by the Delivery Partners has demonstrated that delivery in excess of 2,500 dwellings is possible prior to delivery of either the A120 or A12 upgrades.
- 5.5 Land within our control at West Tey will also have a significant role to play with the delivery of sustainable transport methods across the region. The prioritising of these travel methods has been at the heart of both the Councils and the Delivery Partner's proposals from inception and is reflected in the display of 'walkable neighbourhoods' within the Design Delivery Report.
- 5.6 West Tey will help deliver a suitable mass rapid transit (MRT) system to a standard that encourages the use of sustainable transport methods both within the new community and within the wider region. This will evolve over time with as the population, and demand grows.
- 5.7 Even beyond its borders the garden communities will have the opportunity to facilitate the delivery of improved pedestrian and cycle linkages between surrounding settlements.
- 5.8 The delivery model for the communities provides assurances that the necessary infrastructure, including health and education provision, is met in line with housing and economic growth. Liaison is ongoing between statutory providers, the Councils and the Delivery Partners to gain a thorough understanding of what the need will be and how best it should be delivered.

⁵ West Tey Initial Transport Strategy – Iceni Projects – December 2017

6. MATTER 6: THE PROPOSED NEW GARDEN COMMUNITIES

Questions 1 – 2

- 6.1 The Councils have produced a wealth of documentation to detail the rationale which informed their site selection⁶.
- 6.2 Furthermore, the Design Delivery Report and technical work undertaken by the Delivery Partners confirm land under their control to be deliverable for approximately 17,000 dwellings following consideration of the site constraints and opportunities set within its current context.

Question 4

- 6.3 Further work is still required to accurately define green buffers around the proposed garden communities. However, an early commitment is being made by the Delivery Partners in helping ensure the unique character of the surrounding settlements is secured. This is demonstrated within the Design Delivery Report.

Question 5

- 6.4 The Councils have used the ATLAS model with further refinement provided by their consultants to provide a robust and established viability assessment.
- 6.5 The Delivery Partners have undertaken its own independent viability assessment for land under its control. A summary⁷ of this assessment is provided for the EiP. The findings of this assessment broadly align with that of the Council commissioned Hyas Report and reinforces the conclusions that a new garden community is viable and deliverable.
- 6.6 The detail of this assessment has been informed by technical assessments⁸ detailing the quantum and subsequent costing of necessary infrastructure.

⁶ SD/001 North Essex Authorities Strategic Section One for Local Plans: Draft Publication (Reg 19) Draft Sustainability Appraisal - June 2017

⁷ West Tey Viability Summary – Cirrus Land Limited – December 2017

⁸ West Tey Infrastructure Delivery Report – Create Consulting – January 2017 | Community Infrastructure Audit – Icen Projects – December 2017

- 6.7 Existing Wastewater Treatment Works (WwTW) at Coggleshall are expected to support an initial phase of development of 1,500 dwellings; however, a new WwTW will be required to serve the majority of the site. Anglian Water (AWS) have agreed the new WwTW in principle, although the final location is to be decided following a feasibility study. The initial phase of WwTW is to be developer funded, after which works will be covered by Anglian Waters AMP programme.
- 6.8 An analysis⁹ of potential rapid public transit systems has been undertaken to seek the most appropriate MRT option based on cost-benefit analysis. This has further informed the viability assessment.
- 6.9 Furthermore, the proposed delivery model with the creation of a master-developer allows the comprehensive planning and delivery of infrastructure in conjunction with and where appropriate prior to the delivery of housing.
- 6.10 The specific timing of this infrastructure will need to be flexible as the delivery of the site comes forward. The delivery model allows for this flexibility to be built-in and should not be undermined by the specific requirements being detailed within the policy. Infrastructure provision is influenced by factors outside of the site boundary given the regional impact of the new garden communities. Creating policy too specific, as suggested in Question 7, is unjustified and runs the risk of undermining the deliverability of the developments.

Question 8

- 6.11 As detailed above, the Hyas Report utilises an industry established model for assessing major development projects. This has been further supported by our own viability assessment confirming the deliverability of land under control of the Delivery Partners for circa 17,000 dwellings with all the associated infrastructure.
- 6.12 What this modelling hasn't accounted for is the potential for the master-developer to retain services/amenities within the garden community which have the opportunity to provide a revenue stream across the lifetime of the development.
- 6.13 Output rates have been assessed at between 350 and 500 dwellings per annum at its peak and no more than 350 within the Plan period. This is considered to be a reasonable, potentially conservative assumption given the unique circumstances of the Site. These include:

⁹ MRT Note – Icenl Projects – June 2017

- A largely unconstrained site with no recognised ‘risks’ to inhibit implementation;
 - Opportunity to provide numerous outlets (approximately 6-8 leading outlets) from multiple parts of the site;
 - The early engagement of utility providers to forward plan the delivery of infrastructure;
 - The early implementation of social infrastructure;
 - Master-developer role providing serviced plots to house builders;
 - The encouragement of small-medium house builders;
 - Inclusions of custom and self build plots;
 - L&Q as delivery partner giving a focus on affordable housing delivery. This is not market constrained and can be adaptable. Should the market change during delivery L&Q will adjust the profile of what it is delivering through the increase in affordable and rental packages. Research¹⁰ suggests sites delivering 30%+ affordable housing have an approximately 40% increase in annual build rates for large sites compared to those delivering less.
- 6.14 Furthermore, the early implementation of social infrastructure into the site provides the rationale for a premium to be applied. The provision of schools at an early stage, and their subsequent success, can lead to a rush by buyers to ensure they are within the catchment. At Heyford Park, the success of a newly opened school increased sales price growth from £250/sqft to £340/sqft.¹¹
- 6.15 Smart place-making such as the principle of walkable neighbourhoods has helped secure a premium in land-values at Poundbury (on top of the more recognised architectural influences). Through delivering higher densities and creating walkable neighbourhoods, healthier lifestyles are created and local shops and services are more widely supported increasing land value.
- 6.16 The principle of long-term stewardship and the creation of public governance bodies (e.g. Land Trusts) to manage the public realm secure its long term quality and vitality.
- 6.17 Forward funding for the initial delivery of infrastructure will involve significant borrowing from private and/or public routes. The key to this funding is its patience in realising returns and ability to be resilient to a fluctuating market over the lifetime of the build. L&Q has the financial strength to provide

¹⁰ Start to Finish: How Quickly do Large-Scale Housing Sites Deliver? November 2016

¹¹ Spotlight Development: The Value of Placemaking – Savills World Research - 2016

the level and scale of funding required within the stated model required to deliver the garden community.

Question 9

- 6.18 The provision of affordable housing is an important aspect to the success of the new settlements and the creation of balanced communities. L&Q is one of the country's leading providers of affordable housing and see its provision as a key aspect in securing the delivery of the site.
- 6.19 We have stated the benefits of affordable housing in providing a varied and adaptable offer compared to market sale housing, and the role this has in sustaining a constant delivery at the Site throughout a fluctuating market.
- 6.20 The viability modelling that has been undertaken by both the Councils and the Delivery Partners has accounted for a 30% provision of affordable housing over the lifetime of the delivery programme. The proposal is viable and achievable on these assumptions.
- 6.21 Despite this commitment, it is important for policy to avoid being overly restrictive in how affordable housing is to be provided. Setting affordable housing as a minimum, with no mechanism that can be applied, fails to protect the long term viability across the life of the build. Given the length of the build programme, flexibility is required.

Questions 10 and 11

- 6.22 As detailed above, a range of technical studies has informed the Design Delivery Report and subsequent viability assessments. Through these, the Delivery Partners can confirm land under their control is capable of delivering a minimum of 2,500 dwellings within the Plan period as part of a comprehensive garden community delivery circa 17,000 dwellings, again within land under our control.
- 6.23 Crucially, an initial transport assessment demonstrates that 2,500 dwellings can be accommodated within the Plan period without a reliance on the A12 and/or A120 upgrades.
- 6.24 The Design Delivery Report demonstrates the primary, secondary and MRT network that could be established across the Site. This links a network of tiered, walkable neighbourhoods including the town centre, as well as the existing and potential future rail stations.
- 6.25 Access from the strategic road network is achievable in a phased manner appropriate for the scale of development. Technical evidence supports initial phasing being achieved off the existing A120, with a further connection to the A12 unlocking a 1B phase, and the provision of a bypass road from the A120 at Coggeshall, to the A12 providing suitable capacity to accommodate Phase 1C and

approximately 2,800 – 3,646 dwellings. This infrastructure allows the delivery of 2,500 dwellings in the Plan period without a reliance on the A120/A12 upgrades currently being consulted on. This process is further supported by the Councils' own feasibility studies¹².

- 6.26 Options for a potential new station at West Tey have been assessed by the Council. The Delivery Partners remain committed to work with the Councils to determine the most appropriate response to rail futures at West Tey.
- 6.27 A separate assessment of delivery of a new station has been undertaken which has identified various matters to address. However, sufficient land is made available to facilitate a new station within the garden community.
- 6.28 Furthermore, there is no technical reasoning, subject to timetabling, to suggest a new station, either in place of or conjunction with the existing station, cannot be delivered at the Site. This is unlikely to be deliverable until after the Plan period. Improved pedestrian, cycle and public transport access to the existing station can be implemented in the first instance.

Question 12

- 6.29 This specific questions is addressed within previous representations (Colchester Borough Council representation numbers S1.110/ 7119 and S1.110/ 7120. Braintree District Council representation number S1185/ 522) which remain pertinent on this matter.

Question 13

- 6.30 The provision of employment and jobs has the potential to exceed that anticipated within the current policy. A comprehensive employment strategy is required but early assessment suggests the early delivery of a 100 acre business park is possible within the Plan period.
- 6.31 This reservoir of employment land provides flexibility during the Plan period and beyond to assist in the economic growth of the region and adjust to changing market demand.
- 6.32 Furthermore, job generation across the site goes far beyond just the traditional B1/B2/B8 offer, with significant retail and leisure offerings in addition to home/flexible workers related to the housing delivery.

¹² EB026 Colchester Braintree Borders Concept Framework [Figure 2.6] | A Plan for Colchester Braintree Borders Issues and Options Report [Figure 5.2]

Questions 14 and 15

- 6.33 Policies SP7 – SP10 set the principle of development at the garden communities setting the framework for more detailed work to inform the extent of protection required to environmental and heritage sensitivities.
- 6.34 The Design Delivery Report demonstrates that an appreciation of existing sensitive features have been accounted for and can be accommodated without impacting the delivery of a garden community of approximately 17,000 dwellings within land under control of the Delivery Partners.

Question 17 and 18

- 6.35 The Councils have recognised broad locations for growth anticipating their delivery within the 6-15 year period of the Local Plan. This aligns with paragraph 47 of the NPPF. Sufficient evidence has been provided to demonstrate land at West Tey as deliverable with an appreciation of the St Modwen Court of Appeal decision (Ref: St Modwen v SSCLG & ERYC [2017] EWCA Civ 1643).
- 6.36 The concept of producing a second tier policy document to provide further detail to the proposal is well established for allocations of such significance. Given the length of the delivery programme for these developments, it will be necessary to revisit, review and update policy documents a number of times. By having a second tier document providing these specifics, this process is easier to manage outside of a complete Local Plan Review.

Question 19 and 20

- 6.37 The Delivery Partners together form a single promotion and delivery partnership tied into a promotion agreement encompassing circa 980ha of land within the Colchester Braintree Borders Garden Community. This platform is an effective single ownership arrangement for the site.
- 6.38 This point is crucial in light of comments made by Lord Kerslake¹³ that land ownership at the site is “complex”. In reality, sufficient land to deliver the requirements of Policy SP9 is available within this single agreement.
- 6.39 This straightforward arrangement allows for a range of potential delivery models to be achievable. The Delivery Partners have worked closely with the Councils throughout the promotion of the site

¹³ EB009 North Essex Garden Communities Peer Review January 2017 [Page 6]

and production of the Local Plan, a commitment remains to continue this joint working throughout the design and delivery of the Site, with the willingness to enter into a suitable LDV arrangement.

- 6.40 However, it should be noted L&Q has the financial strength to provide the level and scale of funding that will be required to deliver the garden community in isolation. The 2017 Financial Statement states net assets at £10.8 billion. There is a committed development facility of £2.6 billion.
- 6.41 L&Q is committed to the delivery of the New Garden Community at West Tey. While it is right that a range of funding options should be considered, it may be that the most advantageous financial arrangements for the project, and for the Councils, can be provided by L&Q.
- 6.42 Rather than striking any doubt into the potential delivery arrangements of the project, this additional option provides the security of delivery with the outcome being the same delivery model which ensures the provision of infrastructure in conjunction with housing and economic growth.

7. MATTER 7: THE SPATIAL STRATEGY FOR NORTH ESSEX

Question 2

- 7.1 The spatial strategy and the delivery of garden communities are to be founded within the Garden City Principles as established within the NEGC Charter and supported by the Delivery Partners.
- 7.2 Part of being able to commit to these principles is founded in the scale of the proposals and the subsequent critical mass they produce. This justifies and makes viable the provision of infrastructure in conjunction with the housing and economic growth.
- 7.3 Whilst 2,500 dwellings is seen as a minimum that can be provided within the Plan period, this figure in itself would not be sufficient to justify the delivery of associated infrastructure that would help meet the spatial objectives of the Plan. A wider viewpoint beyond the Plan period is required.

8. MATTER 8: THE PROPOSED NEW GARDEN COMMUNITIES – SPECIFIC MATTERS

Question 25

- 8.1 A range of technical documentation to inform the Design Delivery Report and confirm that land under control of the Delivery Partners as capable of delivering approximately 17,000 dwellings with associated infrastructure in isolation. The land has the potential to form part of a wider garden community if necessary.
- 8.2 An Infrastructure Delivery Report has been produced by the Delivery Partners in liaison with utility providers confirming their ability to serve the site.
- 8.3 Existing Wastewater Treatment Works (WwTW) at Coggeshall are expected to support an initial phase of development of 1,500 dwellings, however, a new WwTW will be required to serve the majority of the site. Anglian Water (AWS) have agreed the new WwTW in principle, although the final location is to be decided following a feasibility study. The new WwTW will have the potential to improve water quality in the area by diverting the flows from the older works at Coggeshall to the new. Additionally the new WwTW will enable a site wide greywater recycling system to be installed, facilitating a dual pipe system to each of the dwellings, significantly cutting down potable water supply demand. The initial phase of WwTW is to be developer funded, after which works will be covered by Anglian Waters AMP programme.
- 8.4 UK Power Networks have confirmed sufficient power can be provided to the area to serve the development from traditional sources. An initial development of 1,500 dwellings can be served prior to requiring off site improvement works. Subsequently a new 33kV cable laid from Abberton into the Mark's Tey primary substation would serve an additional 3,500 dwellings, following which a new primary substation would be required on site.
- 8.5 A medium pressure gas main which crosses the site can supply an initial development of 1,500 dwellings, following which, offsite reinforcements will be required to supply subsequent dwellings. The provision of a new grid connection will be a major benefit for sustainable energy, enabling SMART technologies and the development of a cutting edge future proofed energy solution for the site. Coupled with these, a proposed community gas fired CHP plant will ensure that West Tey is in compliance with government energy policy.
- 8.6 Anglian Water and Essex and Suffolk Water Co. have confirmed water can be provided to site with sufficient resources available at source to meet demand. The existing mains network will require reinforcements to serve the site, with a new supply being brought to the site from the Abberton

reservoir. The proposed dual pipe, rainwater harvesting and water efficient appliances will greatly reduce the demand for potable water.

- 8.7 BT Open-reach have confirmed there will be no issue in extending the existing fibre cables along the A120 into the proposed development area. Additionally a community wide Wifi network has been proposed which would facilitate the overall management of the SMART grid network.
- 8.8 The works required to serve the West Tey development are considered normal for a development of this scale. Extension of existing services has the potential to serve an initial phase of development of 1,500 dwellings prior to offsite reinforcements being required. There is a significant opportunity for commercial energy generation due to the potential growing customer base and the opportunity for new infrastructure. From a review of the evidence it is concluded that there are no natural, physical or economic constraints which will prevent the infrastructure required for the garden community development from being delivered.

Questions 27 – 28

- 8.9 Policy SP9 refers to the retention of “clear separation” between the new garden community and the nearby settlements of Coggeshall, Stanway, Easthorpe and Feering. As is shown within the Design Delivery Report, suitable green buffers can be established without impacting the potential delivery of a garden community of approximately 17,000 dwellings within land controlled by the Delivery Partners.
- 8.10 A balance will need to be achieved between an appreciation and preservation of the character of existing communities, and amalgamating these into the wider site to allow residents to benefit from new communities.

Question 29

- 8.11 Starter homes are now included within the definition of Affordable Housing under the provisions of the Housing and Planning Act 2016.
- 8.12 The affordable housing offer within the garden community will be crucial in the delivery of a balanced community. The commitment to this delivery by the West Tey team is unquestionable, with L&Q forming one of the country’s leading providers and operators of affordable housing.
- 8.13 It is important a package of affordable housing is provided to cater to a range of different needs. Being overly specific within policy risks undermining the ability of the affordable housing provider to adapt to changing demand, especially given the long timetable associated with the delivery of a garden community.