

Examination of the North Essex Authorities' Section 1 Plan

Andrewsfield New Settlement Consortium

Matter 6: The Proposed New Garden Communities – general matters

(policies SP7, SP8, SP9 & SP10; paragraphs 9.1-9.2)

Question 1: How were the broad locations for the proposed garden communities selected, and what evidence documents were produced to inform their selection ?

Answer 1: Braintree District Council (BDC), Colchester Borough and Tendring District Councils, together with Essex County Council, have conducted a rigorous assessment to identify suitable and sustainable locations for garden communities. In the case of Braintree, this included a Call for Sites, together with extensive local plan consultation. Consultants appointed by the authorities, AECOM, conducted an assessment and evaluation of potential garden community scale developments, including the West of Braintree Garden Community (WBGC).

The Andrewsfield New Settlement Consortium (ANSC) engaged fully in the Braintree section 1 Plan making process, submitting a comprehensive suite of site specific evidence base documents relating to the WBGC including: a development vision and master plan; flood risk assessment; transport assessment; ecology assessment; landscape technical report; contamination assessment; baseline heritage appraisal; agricultural land classification and viability assessment. These site specific evidence base documents were all submitted towards the Reg. 19 Braintree Local Plan consultation, and the same documents have also been issued to Uttlesford District Council due to the WBGC potentially being a cross-boundary development.

Our answer to Matter 8, question 30, clarifies the evidence base that has been prepared to confirm that the WBGC is a suitable site to deliver a garden community providing for more than 5,000 dwellings.

Question 2: Have landscape, agricultural land, flood-risk and heritage assessments been carried out to inform the locations of the proposed garden communities ?

Answer 2: In order to supplement and inform the assessments carried out by BDC, ANSC submitted site specific evidence documents to both Braintree and Uttlesford Districts relating to the WBGC including: a landscape technical report; agricultural land classification report, flood risk assessment; and a baseline heritage appraisal.

Question 3: Is the Sustainability Appraisal of the garden community options [EB/014 Appendix 1] robust, particularly with regard to its threshold of 5,000 dwellings ?

Answer A3: The Sustainability Appraisal of the garden community options is robust, and the application of a threshold of 5,000 dwellings is entirely appropriate. In order for a new garden community to be self-sustaining to support a secondary school, primary schools, health care, employment opportunities, sports, recreation, leisure uses (as identified by the master plans for the WBGC prepared by AECOM for BDC and by GL Hearn for ANSC) then the total number of new homes should be in excess of 5,000.

Question 4: Are the locations for the proposed garden communities and any associated green buffers adequately and accurately identified on the Policies Maps. Should they be more, or less, clearly defined ?

Answer 4: The locations of the proposed garden communities are identified appropriately on the Policies Maps for the purpose of the Section 1 Plan. In the case of the WBGC Map 10.2 A, there will be a requirement for green buffers, the extent of which will need to be considered through detailed master planning and evidence base testing. The development vision and master plan submitted by GL Hearn on behalf of ANSC towards the Reg. 19 Local Plan consultation identifies an option for development of the WBGC, including strategic landscape buffers notably to the east of the site. Nevertheless, alternative options for development of the WBGC, such as the options considered by AECOM on behalf of BDC, may result in a different arrangement of proposed development land parcels and landscape buffer areas. The Policies Maps, as included within the Section 1 Plan, provide for a degree of flexibility and allow for future master planning and site specific development plan document to define the proposed development land parcels and related infrastructure, including green infrastructure.

Question 5: Have the infrastructure requirements of the proposed garden communities been adequately identified and costed ? including the requirements for:

- (a) Road improvements;**
- (b) Rapid public transit, bus and park-and-ride services;**
- (c) Water supply and waste water treatment;**
- (d) Primary healthcare;**
- (e) Schools and early years' provision;**
- (f) Leisure and sports facilities.**

Answer 5: The Council's evidence base documents, including the Infrastructure Delivery Plan, October 2017, provide appropriate identification and costings of infrastructure for the proposed garden communities. Furthermore, the viability assessment prepared by Hyas on behalf of the North Essex Authorities, and the viability assessment prepared by GL Hearn on behalf of ANSC identified and costed the infrastructure costs.

Question 6: Is there evidence that the infrastructure required will come forward within the necessary timescales ?

Answer 6: The evidence base to the Section 1 Plan includes concept frameworks and an Infrastructure Development Plan which consider the required infrastructure and the potential timing of the infrastructure. In the case of the WBGC the concept framework prepared by AECOM (EB/012) includes Figure 20 identifying the potential commencement stage transport infrastructure and Table 2 identifying infrastructure requirements for the proposed development of 2,500 homes up to the Plan period to 2033.

ANSC is committed to working with BDC, ECC and all stakeholders to ensure that the infrastructure required will be brought forward within the necessary timescales to support the development of the WBGC, including 2,500 homes by 2033. ANSC continues to engage positively with BDC concerning the potential delivery of the WBGC via a Local Delivery Vehicle.

Question 7: Should policies SP7, SP8, SP9 and SP10 make more specific requirements as regards the provision and timing of the infrastructure needed for the proposed garden communities ?

Answer 7: Policies SP7, SP8, SP9 and SP10 are appropriately worded to make clear that important infrastructure will be required for the garden communities. The policies also appropriately allow for the strategic growth area Development Plan Documents to provide further clarification and confirmation of the timing of the infrastructure needed for the proposed garden communities to be informed by more detailed site specific master planning.

Question 8: Has the economic viability of each of the proposed garden communities been adequately demonstrated in the Hyas North Essex Local Plans (Section 1) Viability Assessment (April 2017) [the Hyas report, EB/013] ? In particular, in the Hyas report:

- (a) Are appropriate assumptions made about the level and timing of infrastructure costs ?**
- (b) Is the contingency allowance appropriate ?**
- (c) Are appropriate assumptions made about the rate of output ?;**
- (d) Are appropriate assumptions made about the timing of land purchases ?**
- (e) Is it appropriate to allow for a Garden City premium ?;**
- (f) Is the viability threshold set at an appropriate level ?**
- (g) Should an allowance have been made for inflation ?**
- (h) Is an appropriate allowance made for finance costs ?**
- (i) Is the residual value methodology (GCLS model) appropriate ? Should a discounted cash-flow methodology have been used instead ?**

Answer 8: GL Hearn submitted a viability review on behalf of ANSC towards the Reg. 19 consultation. The GL Hearn viability review considered the evidence presented within the Hyas report as appropriate in its approach, methodology and conclusions. GL Hearn concurred with the findings of the Hyas report and that the proposed WBGC development scheme is viable based on the emerging concept Master Plan.

Question 9: Is there evidence to demonstrate that 30% affordable housing can be viably provided at each of the proposed garden communities ? Is it appropriate for this figure to be set as a “minimum” requirement ?

Answer 9: The high level viability assessment carried out by Hyas, as well as the site specific viability assessment and viability review prepared by GL Hearn on behalf of ANSC indicates that 30% affordable housing can be viable at the WBGC. Nevertheless, it is submitted that 30% should not be a ‘minimum’ requirement, but rather the level of affordable housing provided on site needs to be subject to a Financial Viability Assessment for each phase of the scheme providing for flexibility throughout the duration of the development.

Question 10: Is there evidence to demonstrate that each of the proposed garden communities can support the range of facilities that are required by policies SP7, 8, 9 and 10 ?

Answer 10: The Council’s evidence base, together with the site specific evidence base submitted by GL Hearn on behalf of ANSC relating to the WBGC demonstrates that the WBGC can support the range of facilities required by policies SP7 and SP10. Specifically, the development vision and master plan prepared by GL Hearn on behalf of ANSC identifies provision of a wide range of facilities including: secondary school; primary and pre-schools; health facilities; retail and leisure; recreation, open space and sports, allotments, and community uses.

Question 11: Is there evidence to show that each proposed garden community is capable of delivering 2,500 dwellings within the Section 1 Plan period ?

Answer 11: The North Essex Authorities are making strong progress in the preparation of the Joint Strategic (Section 1) Plan. In addition, in the case of the WBGC, BDC has already commenced (jointly with Uttlesford Council) issues and options consultation on the WBGC Development Plan Document (DPD). The WBGC DPD is due for adoption in spring/ summer 2019. Where an outline planning application for the WBGC is submitted by summer/ autumn 2019 then an outline consent could reasonably be secured by the end of 2019. Reserved Matters applications could then follow in 2020, allowing for a start on site and delivery of 2,500 homes by 2033 in accordance with the Section 1 Plan housing delivery trajectory of 250, 350 and 400 dwellings per annum being delivered at the WBGC from 2023/24, 2024/25 and 2028/29 respectively.

Question 12: Have appropriate arrangements been made to apportion dwelling numbers at each proposed garden community between the respective housing requirements of the relevant local planning authorities ?

Answer 12: The WBGC can deliver 2,500 dwellings within Braintree District within the Plan period to 2033. Should Uttlesford District Council decide to also include land within Uttlesford District as part of the WBGC then additional homes (in addition to the 2,500 within Braintree) could be delivered at the WBGC within Uttlesford District. GL Hearn submitted a development vision and master plan on behalf of ANSC towards the Reg. 19 Braintree Local Plan identifying at least 6,775 dwellings provided within Braintree and at least 725 dwellings provided within Uttlesford. The potential housing numbers within Braintree (and Uttlesford) could be greater dependent on the extent of the final development land parcels and the final development boundary.

Question 13: How much employment land is to be allocated at each proposed garden community, and how many jobs is each expected to provide, both within and beyond the Section 1 Plan period ? Should this information be included in the policies ?

Answer 13: It is submitted that it is neither appropriate nor necessary to specify the extent of land to be allocated at the proposed garden communities at this Joint Strategic (Section 1) Plan stage. The quantum and most appropriate location for employment land at the WBGC will most appropriately be defined and determined at the WBGC strategic growth DPD plan making stage. Nevertheless, the development vision and master plan that GL Hearn submitted on behalf of ANSC towards the Reg. 19 Braintree Local Plan indicated provision for: nearly 10.5 hectares of employment land; over 5 hectares retail land; as well as other employment generating uses (community over 1 hectare, and education nearly 20 hectares). These new employment land allocations would supplement the existing employment uses within the existing Andrewsfield locality.

Question 14: Do the policies for the proposed garden communities make adequate provision for the protection and / or enhancement of the natural environment and biodiversity ? Is there consistency between policy SP7 and policies SP8, SP9 and SP10 in these respects ?

Answer 14: Yes, the proposed garden communities make adequate provision for protection and / or enhancement of the natural environment and biodiversity through policies SP7, SP8, SP9 and SP10. In the case of the WBGC the landscape and ecology appraisals submitted by GL Hearn on behalf of ANSC towards the Reg. 19 Local Plan consultation set out a number of mitigation measures to protect and enhance the natural environment and biodiversity. For landscape these included:

- retaining and protecting existing woodland and retaining and connecting isolated sections of woodland to provide visual screening and encourage biodiversity;
- maintaining and enhancing existing hedgerows and additional planting in ‘gappy’ sections;
- resurfacing and connecting existing public rights of way for recreational use;
- minimise alteration to landform and enhance existing watercourses;
- protect the character of historic lanes;
- allow buffer zones around existing heritage assets;
- incorporate screen planting to the south of Saling Grove, and screen planting at Onchor’s Farmhouse and Parkes Farmhouse;
- constructing wildlife corridors within and through the built form; and
- maintaining cross valley views from the east, but screening development blocks where practical.

For ecology, mitigation measures include:

- retention and enhancement of boundary features e.g. hedgerows, treelines;
- retention and enhancement of habitats of high ecological value e.g. woodland, waterbodies;
- inclusion of appropriate native trees and scrub species within landscape schemes;
- sympathetic lighting scheme to minimise lighting impacts, particularly around habitats;
- installation of bird/ bat boxes;
- creation of flower rich meadows; and
- creation of friends of community group to encourage involvement in the local environment through habitat management activities.

It is expected that a number of these mitigation measures would be applied to the WBGC strategic growth DPD.

Question 15: Do the policies for the proposed garden communities provide adequate protection for heritage assets ?

Answer 15: Yes, the policies for the proposed garden communities provide adequate provision for heritage assets. In particular, parts 19 and 20 of policy SP10 provide specific reference to the need for the WBGC to provide landscape buffers as well as enhancements to heritage and biodiversity. A baseline heritage appraisal relating to the WBGC was submitted by GL Hearn on behalf of ANSC towards the Reg. 19 Braintree Local Plan. The heritage appraisal provides a robust and strong evidence base against which the WBGC strategic growth DPD can be prepared, to include appropriate measures for the protection of heritage assets, which may include:

- retaining the structure of field systems for listed farmsteads;
- providing a landscape buffer to individual groups of farmhouses, cottages or ancillary structures associated with agriculture;
- retaining the axial view south from the Grade II listed Saling Grove;
- retaining views from the north-west of the Church of St James and Saling Hall;
- reinstating Repton's historic parkland; and
- a full Heritage Impact Assessment to inform any future master plan.

Question 16: Should policies SP7, SP8, SP9 and SP10 include:

- (a) A requirement for the optional national water use standard of 110 litres per person per day ?
- (b) A requirement to minimise the impact of external lighting?
- (c) Reference to specific standards for green infrastructure ?
- (d) Provision for bridleways
- (e) Specific reference to places of worship as part of their requirement for community facilities ?

Answer 16: Policies SP7 to SP10 could include reference to the matters (a) to (e) above. Nevertheless, it is submitted that these matters will be most appropriately defined and confirmed within the respective strategic growth DPD's and future area-specific design guides.

Question 17: Is the proposal to prepare subsequent Development Plan Documents [DPD's] setting out the design, development and phasing principles for each garden community, justified?

Answer 17: Yes, the proposal to prepare strategic growth location DPD's for each of the garden communities is justified. The Joint Strategic (Section 1) Plan appropriately provides the high level strategic policy support for the proposed garden communities, establishing the principles of the North Essex Garden Communities. The Section 1 Plan also appropriately provides a clear indication of the confirmed areas of search and a clear steer on the scale of the proposed Garden Communities. The proposed strategic growth location DPD's will each progress through a thorough and informative consultation and review process including with stakeholders including with existing local communities.

Question 18: In guiding the development of the proposed garden communities, is there an appropriate division between the roles of the Section 1 Plan and the DPD's; or should the Section 1 Plan set out more detailed requirements than it does currently ?

Answer 18: Yes, there is an appropriate division between the roles of the Section 1 Plan and the DPD's. The former provide a high level strategic policy support for the North Essex Garden Communities with a set of principles against which each of the more detailed site specific garden community DPD policies can be prepared. It is not considered that the Section 1 Plan should set out more detailed requirements than it does currently.

Question 19: Will current and future land ownership arrangements facilitate the delivery of the proposed garden communities ?

Answer 19: The majority of the WBGC area of search within Braintree District is currently owned by ANSC consisting of three landowners. The three landowners have co-operated and worked together over a number of years and intend to do so as the WBGC site progresses from the Strategic Plan making to DPD preparation and the delivery stages. ANSC is informed that the North Essex Authorities have created a Local Delivery Vehicle which would have the authority and a remit to facilitate and deliver the WBGC. ANSC continues to work with the North Essex Authorities to facilitate the delivery of the proposed WBGC. Additional land forming the remainder of the WBGC area of search is owned by Galliard Homes. ANSC also continues to work closely with Galliard Homes to facilitate the delivery of the proposed WBGC.

Question 20: Are the proposed governance and delivery mechanisms for the garden communities, potentially involving Local Delivery Vehicles, appropriate?

Answer 20: ANSC considers that the proposed governance and delivery mechanisms for the garden communities, potentially involving Local Delivery Vehicles, could be appropriate to the WBGC.