

## Appendix 4

### Consultations

#### Little Waltham Parish Council

Comments
08.06.22
Little Waltham Parish Council has commented as follows: <ul style="list-style-type: none"><li>• Infrastructure – The development should have no adverse impact upon existing services such as schools and GP surgeries and should cater for the additional need for those services.</li><li>• Traffic – The development will generate a substantial number of additional vehicles travelling along already congested roads; this will need to be managed so that there is no detrimental impact on existing residents. The NE Bypass, as a relief road should be constructed in a timely manner so the infrastructure is in place prior to the construction of the dwellings.</li><li>• Public Transport – The development aims to avoid car journeys by making provision for public transport; the experience with the existing bus service at Channels has been disappointing. The service has proven highly unreliable resulting in residents reverting to car use to travel to and from the area. A regular and reliable bus service should be made available.</li><li>• Open Space &amp; Recreational Provision – Concern is expressed regarding stewardship; Channels residents have experienced difficulties in relation to the quality of service provided and the cost of maintaining communal land. Existing arrangements for private management companies to manage land does not appear to serve the needs of the community and provides an additional layer of cost for residents.</li><li>• New Parish Council – A new Parish Council is to be set up and could become involved in the management of public areas, offering a more community focussed approach to the issue of management.</li><li>• Wellbeing – Reference is made to the needs and wellbeing of future residents; the Parish Council notes that the Livewell Accreditation process is to be considered.</li></ul>

#### Broomfield Parish Council

Comments
01.06.22
A direct foot and cycle path should be provided between the Chelmsford Garden Village and Broomfield Hospital; the reference to Mill Lane on page 68 of the DFD is confusing as it is assumed the reference should refer to Croxtons Mill Lane.
No other comments at this stage.

#### Great & Little Leighs Parish Council

Comments
No response.

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### Boreham Parish Council

Comments
20.06.22
No objections at this stage.

### Springfield Parish Council

Comments
15.06.22
Provision should be made for formal allotments and the protection of existing hedgerows.

### Terling & Fairstead Parish Council

Comments
29.06.22
Concerns regarding the timing of the application and how this will be co-ordinated with all the other potential major infrastructure projects - Longfield Solar Farm, the A12 Widening Scheme and the National Grid (overhead power lines and pylons).

### Hatfield Peverel Parish Council

Comments
No response.

### Braintree District Council

Comments
10.08.22
<ul style="list-style-type: none"><li>• Inclusion of infrastructure and facilities, particularly health facilities within the new community, to support sustainable patterns of travel and to avoid additional pressure on facilities in the Braintree District Council area is welcomed.</li><li>• No further comments.</li></ul>

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### CCC Property Services

Comments
01.08.22
No comments.

### CCC Economic Development & Implementation

Comments
02.08.22
<ul style="list-style-type: none"><li>• Support the approach to disperse employment across the masterplan area; this follows work from Lichfields in 2020.</li><li>• Employment provision is not being fully integrated with the Business Park close to the Station (Beaulieu Exchange); the whole offer needs to be fully integrated.</li><li>• The CGC includes the whole area, not just the new Local Plan allocation; this does not always come across in terms of employment within the DFD.</li><li>• The Savills report on the proposals for Beaulieu Exchange has not been provided; this needs to be considered alongside the wider CGC offer.</li><li>• The consortium should be encouraged to develop a wider Employment Strategy for the CGC linking all elements together and making the connections on the softer side of employment growth, including the skills agenda, for example, and the opportunities that the CGC presents.</li><li>• The village centres also play an important role in future employment; this needs to be developed further, again in a wider CGC employment strategy.</li></ul>

### CCC Parks & Open Spaces

Comments
18.08.22
<ul style="list-style-type: none"><li>• Sports Facilities – The comments of CCC Leisure Services are echoed as regards the even distribution of formal sports facilities across three locations, which differs to the CCC Pitch Provision NEC Briefing Paper, which suggested two outdoor sports grounds with a critical mass of sports provision. Reference is also made in the Educational technical document to considering the potential contribution of school sites towards the overall provision of formal open space/sports pitches/facilities; regardless of whether the formal 4.5ha of formal sports pitches, including the provision of 2 x 3G pitches, at the all through school count towards the formal open space requirements of the development, a robust Community Use Agreement with the owner/operator, to ensure ongoing provision and maintenance of all community sports facilities at the site, is essential. The agreement should be secured by condition if possible; if for any reason the 3G pitches lapsed into 4 grass pitches, the quality would not enable the same level of community use.</li><li>• Multi-Purpose Outdoor Sports Courts – CCC Parks Services are unclear what courts would be provided at the all through school site, if any, and how this may impact upon the quantity and usage patterns of those proposed at the Dukes Wood Sports Hub.</li><li>• All Through School Campus – A car parking study/management plan is recommended at the appropriate stage, if two 3G's and two grass pitches are made available to the public at the all through school site; especially if indoor sports facilities are also made available.</li></ul>

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- Facilities – CCC, in conjunction with the Sport England Design Guidance, would wish to agree the specification of any facilities, which it will be adopting/operating in the future eg: sports pitches, multi-use courts, ancillary sports accommodation; it is essential for example, that the courts are floodlit.
- Dukes Wood Sports Hub – No reference is made to the provision of a pavilion/clubhouse/changing area/car parking at this sports hub, unlike stated at the Great Belsteads Sports Hub; such facilities are essential at sports hub sites for successful delivery and sustainability.
- Delivery – The largest quota of sports pitches at Dukes Wood would not be online until Phase 4 of the development (2040-2044); this may strain existing sports facilities in the interim.
- Great Belsteads Village – The proposed outdoor sports ground based within the centre of Park Farm Village and the area located to the west of the Dukes Wood Nature Park are of a size/scale, which would allow resident clubs to flourish and be sustainable, including a club base for social activities; however, the proposed area within the Great Belsteads Village is not, as it only provides 2 pitches/cricket facility. The new sports ground located east of New Hall School is also shown, and whilst this is to serve already establishing communities, the size, scale and facilities proposed is a good model to compare to.
- Neighbourhood Equipped Play Facilities – Further detail may follow, however, the neighbourhood equipped play facilities are not specifically referred to on the illustrative master plan. Informal outdoor youth facilities such as skateboard ramps, half sized 3-side basketball courts for informal use and kickabout spaces (informal recreational use as opposed to use for competitive sports use) are also not specifically mentioned. The distribution of these facilities needs to be considered as part of the development and need to reference to the Local Plan 'Making Places' standards and guidelines.
- Landscape – The proposed more naturalistic landscape approach is welcomed and critical larger scale open space provision; Dukes Wood Nature Park, Park Farm Meadows and the Channels Discovery Park are vital for this development.
- Landscape Setting – The current approach to connecting various development parcels through footpath and cycleway corridors appears narrow and very linear without much scope to widen our and provide areas with practical landscape and open space settings. The purpose/hierarchy of the routes is also unclear. Landscape setting needs to be considered and to be integrated and incorporate all functional open space elements.

## CCC Leisure & Heritage Services

### Comments

21.06.22

- CCC Pitch Provision North-East Chelmsford Briefing Paper – The even distribution of formal sports pitches shown across three locations within the DFD differs from the paper which suggested two outdoor sports grounds with a critical mass of sports provision.
- Joint Use Provision – The Education Technical Document references the potential contribution school sites can make towards the overall provision of formal open space / sports pitches / facilities. 4.5ha of formal sports pitches including the provision of two 3G pitches are proposed at the all through school and would count towards the formal open space requirements of the development, however, it is essential that a robust Community Use Agreement with the owner/operator is put in place to ensure the ongoing provision and maintenance of all community sports facilities at the site. The Agreement should be secured by a condition if possible. Joint use provision of both indoor and outdoor facilities would require early consideration as to the nature of provision, scope, specification, funding and operation in order to achieve successful delivery and long term sustainability. The documents do not make clear how community use of the facilities would be secured and which party/parties would take this

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forward; it is stated that the operator of the school needs to agree, but the facilities may well need to be designed and specified before the operator is confirmed. Should for any reason the 3G pitches lapse into 4 grass pitches then the quality of provision would not enable the same level of community use.

- Indoor Provision: School Site – Little reference is made to indoor sporting needs/use save for a reference in the Health and Community Facilities document, that a four court sports hall is needed. The school could also potentially offer studios, activity rooms, fitness facilities, outdoor courts etc.
- Outdoor Sports Courts: School Site – Clarity is required as to what, if any, multi-purpose outdoor sports court provision is to be accommodated at the all through school site and how this might impact upon the quantity and usage patterns of those proposed at Dukes Wood Sports Hub.
- Car Parking Study/Management Plan: School Site – Should two 3G and two grass pitches be made available at the all through school at the same time, a car parking study/management plan is recommended at the appropriate stage, especially if use coincides with indoor sports facilities being made available to the public.
- Specification of Facilities – CCC would wish to agree the specification of any facilities in conjunction with Sport England Design Guidance prior to adoption / future operation eg: sports pitches, multi-use courts, ancillary sports accommodation; it is essential that courts are flood lit.
- Dukes Wood Sports Hub – No reference is made to a pavilion / clubhouse / changing facilities / car parking at the sports hub unlike the Great Belsteads Sports Hub; such facilities are essential at sports hub sites for successful delivery and sustainability.
- Dukes Wood Sports Pitches – The largest quota of sports pitches at Dukes Wood would not be online until Phase 4 of the development, circa 2040-2044; this may strain existing sports sites in the interim.
- Hanger Sports Hub – Reference was made to a hanger sports hub previously, but it is presumed is no longer part of the scheme.

### CCC Public Health & Protection Services

Comments
14.06.22
No comments.

### CCC Housing Policy

Comments
07.07.22
<ul style="list-style-type: none"><li>• Reference page 54 of the DFD.</li><li>• Wheelchair Accessible Housing – Clarity is required as to what is meant by appropriate accessible and adaptable housing; there are many references to accessibility, but no direct reference to the need for wheelchair accessible housing, which is adapted from the point of completion.</li><li>• Specialist Housing – Strong objection to the reference to the provision of specialist housing for elderly people; there is no evidence base to support this type of accommodation and it discriminates against the other groups requiring specialist housing that are in most housing need as identified in the Housing Strategy 2022-2027.</li><li>• Housing Mixes – The housing mixes are referred to as ‘indicative’, but it is unclear what this</li></ul>

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means / what weight this carries. Having regard to the mix of market housing secured at Beaulieu and Channels, and the fact that the table does not even reference 5 bed units, this is of concern. Should flexibility be required, then the text needs to acknowledge, more overtly, the need to respond to changing needs over the 20 year timescale identified. A Strategic Housing Needs Assessment will be commissioned in the summer and the mix may change significantly for affordable housing and market housing.

- Private Rented Housing – The DFD makes no direct reference to private rented housing; CCC does not identify an express need, but thought should be given to the role this might play in delivering a mixed and inclusive community.
- Affordable Housing – The breakdown in affordable housing provision does not calculate correctly in both tables; the figure is a couple out in various places and should be changed.
- Affordable Housing Percentages – The percentages do not completely match with the requirements for affordable housing in respect of affordable rent, albeit it is only the one decimal point, which is out.
- Affordable Rent – Reference is made to affordable rent, although CCC may wish to explore the need for social rent in the new Strategic Housing Needs Assessment; affordable rent is the preferred reference.
- Policy DM1 – The document seeks to link First Homes and Shared Ownership to Policy DM1; this is incorrect.
- Housing Mix: First Homes and Shared Ownership – CCC do not prescribe a housing mix for these products, but the mix is not supported for First Homes, given the price cap, and is somewhat unrealistic for the shared ownership units, in terms of the provision of larger homes.
- Self-Build – The DFD makes no mention of self-build until a narrow reference in the Phasing section of the document.
- Community Led Housing – Given the supposed ethos and focus on stewardship, it is disappointing that the document does not reference this type of housing. The stewardship section has a very narrow focus on what the group will consist of and how it will tackle open space.
- Travelling Showpeople Site – The location of the site is quite remote and access for larger vehicles seems difficult as currently shown. The scale of the site will need to be clarified to check that it is sufficient for commercial vehicles and the necessary plot requirements.
- Infrastructure Delivery Plan – The IDP will need to secure specialist, affordable housing, self-build and the Travelling Showpeople Site via a s106 Agreement using CCC's template provisions.

### CCC Housing Standards Team

Comments
No response.

### CCC Heritage Officer

Comments
30.06.22
<ul style="list-style-type: none"> <li>• Heritage Assets- Non-designated heritage assets are present at Park Farm and buildings and other structures associated with the WWII Boreham airfield to the east. Wheelers is also a non-designated heritage asset. Number of Grade II listed historic farmsteads and houses close to the site; Peverels, Powers, Shuttleworth, Hobbits, Shoulderstick Haul, Wilderness, Alsteads,</li> </ul>

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Spartigans Hall, Belsteads, Channels, Pratts and Mount Maskells.

- Surrounding Context - Little Waltham and its Conservation Area and Parish Church are situated close by. The landscape surrounding the CGC contains rich archaeological evidence; there are many historic hedgerows relating to the agricultural use of the landscape and fragments of the former deer park pale and north ryde associated with King Henry VIII's New Hall. Several historic tracks also link the farmsteads; Domsey Lane, Pratts Farm Lane and Channels Drive as well as greenways, hedgerows and ponds. The rural character of the area is important to how all these heritage assets are experienced and contribute to their significance.
- Overview of the Heritage Assessment - The findings of the heritage assessment are not fully integrated into the DFD; it is important that the scope of the report fully informs the masterplan, and any variations are justified. The DFD notes (page 77) that detailed heritage assessments are to be undertaken to inform the outline planning applications; this work should be undertaken at an early stage to ensure the DFD fully reflects the heritage constraints and opportunities, where there is an impact on the setting, text should note potential mitigation methods.
- Overview of the DFD - The DFD includes objectives to protect the setting of the heritage assets with the hedgerows retained and the former line of the deer park defined; these features are welcomed but the DFD needs to be amended to protect the historic environment and maximise enhancement opportunities. The opportunities to use the heritage of the site to inform the development are not fully realised. The opportunity for the remaining WWII airfield to form part of the setting retaining the aircraft hanger (page 128) should be explored.
- Guiding Principles of the DFD - The objectives set out on page 76 are welcomed and provide a base to assess the proposals against the objectives. The guiding principles require amendments:

*Guiding Principle 2:*

*'Through positive masterplanning seek to respect and protect the setting of heritage assets to ensure their significance is preserved and wherever possible enhanced and any harm minimised'* should be amended to *'Through positive masterplanning seek to respect and protect the setting of heritage assets*

*to ensure their significance is preserved and wherever possible enhanced, where harm is unavoidable it*

*will be minimised and mitigated.'*

*Guiding Principle 5:*

*'Retain or reinterpret the historic layout of hedgerows where possible in order to respect the historical context and evolution of the site'* should be amended to include *'lanes and historic landscape features'*.

- Heritage Trail - The heritage trail concept is welcomed. The concept of greenways (incorporating landscaping, public art and interpretation) through the site gives the opportunity to celebrate the heritage of the site. The trail should be extended to include both the deer park pales and to link to the Grade II listed buildings. The eastern and western parts of the site should also be linked, and the trails extended beyond the site boundary to New Hall, Little Waltham and Pratts Farm. The trail should also be informed by the ongoing archaeological assessment and where appropriate, these features celebrated.
- Heritage Views - The heritage assessment identifies three important views between heritage sites; between Powers and Little Waltham, Powers and Peverels and Park Farm and Mount Maskall; this provides a strong concept to define local character, gives legibility to the new development and mitigates the impacts on the listed buildings and their settings. The opportunity for these views to be incorporated into the DFD and reflected in the framework layouts is not fully realised. The view from the high ground near Powers Farm to Little Waltham is not reflected in the layout. The orientation of the corridor between Powers and Peverels is incorrect, as it does not link the listed farmstead and the intervening landscape corridor is too narrow. The view between Park Farm and Mount Maskall is also not reflected in the layout. Page 19 of the DFD should identify the views back towards Little Waltham from Powers Farm. The alignment of views between Powers and Peverels should be corrected, and the historic parish boundaries and lanes and tracks should be shown.

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- Layout - The routes of the deer park pale do not appear to fully reflect the layout set out within the heritage assessment; it is important the route is evidence led. The indicative landscape proposals for the deer park and ride are welcomed. Clarity is required as to how the built form will relate to these landscape features - the character of built form is not clear and the landscape and built form appear to be considered in isolation. Specifically, it would be useful to have a study on local character to inform the character of the new settlement. The three ancient parish boundaries provide an opportunity to define character areas and the confluence of the boundaries should be celebrated in the layout.
- Greenways - The greenways which permeate the site and link the heritage assets is a strong concept which uses historic landscape features to provide a landscape setting between the historic farmsteads. The greenway between Park Farm and Channels is important in giving a landscape link, but is too minimal, as is that between Peverels and Powers. Historic landscape features, including hedgerows appear to be retained in the greenways, but there are some areas where they would be removed, particularly in the western part of the site. Treatment of the active travel routes between the farmsteads needs careful consideration (page 131)
- Landscaping - The orchard between Channel and Belsteads should be retained. Car parking needs to be integrated into the landscaping.
- Relationship with Built Form of CGC - The proximity of built form adjacent to Peverels, Channels and Wheelers Hills/Cranham Road is also of concern (page 134); it is important adequate breathing space is provided, to reflect the rural setting and mitigate the impacts. Development beyond RDR2 is not justified and the mitigation measures proposed are inadequate; it erodes the applicant's concept of a settlement wrapped in landscape and is severed from the main community. The area is very sensitive due to the close proximity to heritage assets. The definition of the two of the phases of the former deer park pale and north ryde from New Hall is welcomed.
- Density - Some variation in density occurs across the site, with the highest densities at neighbourhood centres; there is an opportunity to use density to define local character and mitigate heritage impacts. The majority of the development is of a uniform density; there is an opportunity to have landscape led development within the inner deer park and in other sensitive areas to give a sense of landscape setting. The high ground in the northeast portion of the site is sensitive in views from Little Waltham and in the setting of the adjacent heritage assets, this area should have a lower density.
- Mitigation - The heritage mitigation is not well defined and should include no build areas, open space, landscaping, creation of views, woodland planting, landscaping, density, design, layout, scale and materials; it is important that there is a clear mitigation strategy to ensure there is a framework to minimise harm and help define character in future OPA's.
- Historic Lanes - The historic lanes within the site are an important feature; it is unclear from the proposals how their rural character will be maintained, and the built form used to reinforce character. The historic lane towards Park Farm, from Channels Drive, should be defined within the layout (page 131)
- Archaeological - The proposals should be sufficiently flexible to accommodate significant archaeological finds where necessary.
- Document Layout- The language throughout the document is not strong enough to ensure delivery of key mitigation measures, for instance page 142, incorporate greening where possible, there are similar caveats throughout the document; it is essential the principles within the document are strong enough to ensure delivery.
- Document Base - The extent of the historic woodland appears to be taken from the 1874 OS plan; it would be more appropriate to use the 1799 map as this reflects the earlier extent prior to the beginning of the removal of the woodlands. The document is very two dimensional. 3d modelling should be used to show levels across the site.
- Minerals and Extraction - The information on minerals and extraction (pages 20-21) is helpful. Further clarity is required on land restoration within the areas around Park Farm and the deer park pale as these are sensitive.



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### South Essex Parking Partnership

Comments
No response.

### ECC Major Development & New Communities

Comments
<p>01.07.22</p> <p>ECC is a key infrastructure and service provider with statutory responsibilities to ensure that the right infrastructure is delivered in the right place, at the right time and to the right quality to support new and existing communities. ECC welcomes the collaborative planning of CGC shown by the Developer Consortium through taking a landownership blind approach. The TCPA's Garden City Principles should continue to be integral to the more detailed design and implementation of the Chelmsford Garden Community as the planning application process is progressed.</p> <p>ECC are generally supportive of the direction that the draft DFD has taken in response to its input to date and welcome the opportunity to provide further comments to help refine this high-level, overarching planning framework for CGC. The Framework must be clear in establishing key planning principles which can be easily and consistently translated into more detailed masterplans to inform the three anticipated residential-led outline planning applications and full application for RDR2.</p> <p>ECC support the draft DFD in principle, however there are parts which require further thought to ensure that it creates a well-connected green, healthy, active and resilient network of liveable and walkable neighbourhoods meeting the day to day needs of all residents, whatever their life stage, in the longer term. Effective place-making and place-keeping is fundamental.</p> <p>ECC have reservations about aspects of the draft DFD and IDP which could undermine the Garden Community concept and objective of delivering an inclusive, well-designed and sustainable place. Our concerns relate (including but not limited) to:</p> <ul style="list-style-type: none"><li>• Climate challenge – Ensuring CGC can be delivered in a way that truly achieves a net zero development from the outset.</li><li>• Walkable Neighbourhoods – Identifying locations of village/ neighbourhood centres that are at the heart of the communities they are planned to serve and establishing a coherent strategy which favours sustainable and active travel over private vehicles.</li><li>• Liveable Neighbourhoods – Providing clarity on the phasing and implementation strategy to ensure that social, economic and environmental infrastructure is delivered at the right time to firmly establish the CGC ethos from the outset.</li><li>• Inclusive Education – Designing school environments which are safe and secure, encourage active and healthy lifestyles and meet all needs. A demographic study is needed to inform capacity, delivery and funding assumptions.</li><li>• Community Cohesion – Planning well-designed places with village centres interlinked by a comprehensive network of attractive sustainable and active travel modes, which avoids unnecessary community severance by major roads.</li><li>• Place-keeping – Undertaking further work on the assets to be managed and maintained by a stewardship body, as well as understanding the financial requirements of setting up a suitable body is required; there are many matters that need further consideration to ensure CGC is maintained, with the community's direction, to a higher standard than may normally be the</li></ul>

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case.

- Financial Contributions – Ensuring that contributions reflect the technical knowledge and recommendations of infrastructure and service providers from the outset; this will ensure that cashflow and viability assumptions are considered on an appropriate indicative costs basis at this high-level masterplanning stage.
- Delivery and Phasing – Reconsidering the delivery and phasing strategy to ensure that it is clear, coherent and identifies appropriate measures to mitigate potential risks associated with reliance on the timely extraction and restoration of minerals extraction sites.

### **Planning Context**

#### **Planning Policy**

- Policy – Good policy basis for the planning the CGC as set out in the adopted Chelmsford Local Plan.
- Local Plan Review – Work is being undertaken by CCC to extend the plan period; ECC has sought to advise, at a high level, on the likely infrastructure requirements to support the additional 2,500 homes to be delivered at the CGC beyond 2036. Gaps remain in the DFD and IDP on demographics and stewardship in relation to these additional units.

#### **Place-Making and Place-Keeping**

##### **(i) Exemplary Development**

- Nature of the Development – ECC expects the CGC to be a truly high-quality and exemplar development which delivers against the TCPA's Garden City principles and continues to meet the needs of all residents over the longer term. Principles within the draft DFD and IDP, when finalised, need to endure and be enshrined clearly within the Planning Framework Agreement, PFA. A robust and sustainable stewardship model is required, which meets the aspirations and needs of ECC as an infrastructure and service provider for residents.
- TCPA Principles – The principles set clear expectations for the CGC and have helped frame the response to place-making and place-keeping proposals within the consultation.

##### **(ii) Stewardship**

- Arrangements – Commitment to establishing comprehensive stewardship arrangements, which go beyond the management and maintenance of open spaces within the CGC is welcomed. The scope, scale and structure of the stewardship body should be formulated in collaboration with CCC and ECC.
- Engagement – Early and meaningful engagement will be essential to ensuring future stewardship arrangements meet the needs and aspirations of all parties. Concerns are raised at the proposed reliance upon service charges to fund stewardship activities; these may be a necessary component of financing but should constitute only part of a varied blend of capital and revenue generating assets that the stewardship body has at its disposal.
- Timing – Consideration needs to be given to when the CGC wide stewardship body would be established, and any associated activities/measures delivered; the DFD does not address this (pages 156-159).
- IDP – The document does not contain any meaningful references to stewardship despite it forming a key part of the aspirations for the Garden Community as noted in the draft DFD and is more widely intrinsic to TCPA Garden City principles. No specific costs are attributed to stewardship (attachment 1 / page 3 / tab 1) with a passing reference to stewardship within the accompanying viability assessment (attachment 3 / page 21), which refers to s106 / Stewardship / Other with a cost of around £27.5 million attached.
- Standard Development Costs – College and apprenticeship opportunities, discounted bus

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passes, Electric Vehicle Charging Points, on-site renewable energy generation and the nature recovery network, amongst other items are grouped as these costs. ECC query whether stewardship should be grouped in with these costs.

- Stewardship Bodies – Future bodies will require developer contributions both through cash endowment and the transfer of assets to ensure financial viability and sustainability. Further work in understanding the financial requirements of setting up a suitable stewardship body and managing and maintaining assets and infrastructure over the long term is encouraged.

### **Delivery and Phasing**

- Approach – ECC supports the collaborative and land ownership blind approach to the development of the high level masterplan, to be delivered across four phases and supported by three residential-led outline planning applications and one full application for RDR2. Approach should continue at detailed stage.
- Interdependencies – Welcome the acknowledgement of interdependencies of infrastructure delivery across the site; each place-making detail of the CGC is likewise important.
- Ethos – The CGC ethos must be established from the outset; it is critical that each residential phase is appropriately supported by necessary infrastructure to foster behaviour patterns eg: using active and sustainable modes of travel as the default to meet everyday needs within neighbourhoods.
- Indicative Approach – Concern that the proposed approach at the high level masterplanning stage may not actively support sustainable and desirable behaviours from the outset. Delivery of certain critical infrastructure and housing delivery is dependent on timely extraction and restoration of mineral workings on site eg: All Through School is proposed in Phase 2 with the Park Farm Village Centre (and traffic free access for the school) to be delivered in Phase 3; this is dependent on minerals being extracted and restored as planned, in turn dependent on the buoyancy of the economy. A risk exists and it is unclear what mitigation measures could be implemented.

### **Draft Development Framework Document (DFD)**

#### **Public Health and Wellbeing**

- Wellbeing – Active lifestyles are inherently linked to physical and mental health and wellbeing and is central to delivering liveable and walkable neighbourhoods within the CGC, which meet the everyday needs of residents. The health and community infrastructure objective within the DFD broadly reflects this position, however the relationship could be strengthened further with the guiding principles to create greater linkages and recognise interdependencies with other principles for successful place-making.
- Contacts – ECC is the lead authority across Essex for Public Health but works in partnership with CCC and the NHS CCG.
- Key Elements – The importance of the following is highlighted; (i) Key Evidence – including the Joint Strategic Needs Assessment (JSNA) and Public Health district profiles (Sept 2019 for CCC), (ii) Health and Wellbeing Strategies covering the CCC area – The Essex Joint Health and Wellbeing Strategy 2018-2022 and CCC Health and Wellbeing Plan 2019, (iii) a robust Health Impact Assessment (HIA) using an appropriate methodology and (iv) Full engagement with Public Health interests and partners as the planning application process progresses.

#### **Education and Early Years and Childcare**

##### **(i) Early Years and Childcare**

- Provision – Welcome inclusion of early years and childcare settings co-located with the three primary schools and all through school, however, the DFD and IDP refer to two standalone

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facilities contrary to ECC advice. Further discussion is required including regarding potential for additional facilities within the non-residential floor space in the villages. ECC have previously recommended that five standalone facilities be referred to and the potential locations identified as the CGC moves through the planning process. The IDP and local plan recognise two standalone facilities for the 3,000 homes up to 2036; they do not take account of the further 2,500 homes which are planned beyond the current plan period. ECC remain concerned that there is insufficient certainty about the planning and delivery of EYCC at this stage.

### (ii) Primary Schools

- Provision - Identification of four school sites is welcomed; ECC are confident that the right number of schools is proposed to support the CGC and existing houses but without the demographic study it is unable to agree the assumed size of each school.
- Locations - ECC have considered the proposed location of each school from a place making, health, active travel and safety perspective.

#### *Hawthorn Primary School*

- Welcome the setting in principle which proposes a broadly rectangular site, co-located with a village centre and fronting a traffic free square. Active travel routes should be safe and accessible.

#### *Willow Hill Primary School*

- ECC has previously raised concerns about the proximity of the school site to RDR2. The school position has now been amended and the school would retain its relationship with the village centre and traffic free centre for its access and active travel routes.
- The agreed position has not been reflected in the masterplan (page 55) or the aerial view (page 132) which shows a landscaped buffer. The land use and access plan (page 117) also suggest that a residential block could form part of the village centre which could be commercial in use; this requires consistency and clarification.

#### *Great Belsteads Primary School*

- ECC has previously raised concerns regarding the school and its relationship with the village centre and the positioning of the building. The proposed 30m landscape buffer along the southern boundary is welcomed, but concerns remain.
- A commercial building is proposed in the south-western corner of the site. Clarification is required as to whether this is outside the school site. Should this building be delivered, the school would be close to the primary street and the impact on the safe and secure access to the school needs to be considered.
- The buildings which front the school would not have active frontages; this would not be an attractive or welcoming environment.
- The buildings forming the village centre cut across the green link; this would undermine an important active travel route. The landscape buffer needs to be secured through appropriate mechanisms.
- The public square provides access to the school; it is assumed this square is a shared space, but its proposed form and function seems at odds with its location; this is not good place making in the context of the primary school.
- Planning stages - concerned that the DFD principles may be eroded particularly with regard to Great Belsteads. The landscape buffer could be re-considered, or a new vehicular access proposed. Erosion of traffic free squares would be unacceptable. Any departure from the masterplan would increase concerns.
- Overall position - cannot confirm the appropriateness of school sites without more evidence;

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this should be in the form of a School Land Compliance Study.

### **(iii) All Through School**

- Provision - Establishing an all through school is important to deliver a full range of education facilities.
- Layout - Note the QRP report and comments on permeability. Safety and security are considered important; any changes in relation to permeability will result in higher costs. Land compliance study is critical to determining what boundary treatments are required at each site.
- Delivery - All through school cannot be delivered in Phase 2 if the village centre is in Phase 3 as this is the main access to the school; delivery is also dependent on the timings of mineral extraction, which can change.

### **(iv) Special Education Needs and Disabilities (SEND)**

- Provision - ECC is responsible for delivery; the preferred option is to integrate SEND provision on site; this is referenced in the DFD, but design and layout costs need to be considered.

### **(v) Libraries and Adult Community Learning**

- Provision - Welcome the reference to libraries within the DFD. Access to adult community learning facilities is also important. Further discussion welcomed on how these facilities can be delivered.

### **Economic Growth and Skills**

- DFD - Welcome the objective of delivering outstanding educational facilities, but also an objective that caters for education for the post 16 adults. A post 16 education, skills and training section should be included on page 107 of the DFD.

### **Adult Social Care and Independent Living**

- Provision - Housing and neighbourhoods in the CGC should be accessible and inclusive; the commitment as set out in the DFD (page 40-43) is noted. A broad commitment should be contained within the DFD that all new homes are constructed to meet M4(2) and at least 5% meet M4(3).
- Design - Urban design should be approached from the perspective of future residents, who may be vulnerable; ECC expect a commitment to deliver all types of housing and accommodation within the CGC.

### **Digital and Smart Technology**

- Provision - All new developments should include provision of future proofed internet. Reference to be made to Essex Design Guide for more information. Welcome reference in the DFD to superfast broadband and recognition of its importance. ECC would encourage proactive contact with a network provider as part of the planning of the CGC.

### **Movement and Access**

- Policy - The DFD appears to meet the second part of Strategic Growth Policy 6 by including connections the CNEB.
- Delivery - The timing of the CGC needs to well related and the costs funded; in some areas it looks necessary to delay building until the infrastructure is in place.

## Appendix 4

- T CPA Principles:

*Sustainable Transport* - The new development must be supported by sustainable means of transport to serve its needs, including walking, cycling and public transport modes.

*Mode Share and Service Levels*- Quantitative assessment of networks and service levels needs to be addressed further. Wider footpaths will be required in certain locations (separate to cycle paths) to accommodate pedestrian routes to schools. A better understanding of cycle routes across the CGC would be an improvement. Detailed design and modelling of the vehicular accesses proposed, and wider modelling of the houses beyond the current plan period, have not yet been done.

*Walking, Cycling and Public Transport Needs in the IDP to Ensure they are Delivered Before Major Roads* - ECC do not consider that this would be achieved as currently proposed.

*Design of Garden City Layout around Walking, Cycling and Public Transport not Parking and Cars* - Significant concerns relate to the peripheral positioning of the village centres to great Belsteads, Willow Hill and Park Farm Villages and the apparent lack of such a centre for the Channels Expansion; this undermines the propensity of residents to choose to use sustainable transport methods.

Apart from the land reserved for the park and ride the masterplan is too large scale to identify car parking areas. The residential on plot provision proposed is not quantified numerically overall, but will be significant, with implications for mode share and land use. Low provision of the Car Club will miss the potential in terms of spaces saved. The provision of off plot parking from the first units would be a better approach and could be repurposed for something more valuable for the community; it would also help tip the balance towards sustainable methods. Greater investment in shared mobility through the car club is suggested.

Primary streets are proposed to provide access to a loose grid of development parcels, however their importance in terms of movement and place are not clear. Further detail is required. The relative importance of active travel links needs to be confirmed, leaving this to each outline planning application would lead to discrepancies.

The location and design of the schools surroundings are very important in creating a culture of active travel and minimising the use of cars to travel people to school.

The masterplan shows only primary streets which are almost all bus routes; it does not indicate vehicle accesses into, and routes within, the parcels. A greater level of detail, such as an understanding of which areas vehicular traffic is proposed to be attributed to which primary streets would be helpful, to highlight conflicts with active travel routes.

*Ensure that the Transport Assessment (TA) for the new CGC aims to Deliver the Objectives and Mode Share* - An overarching TA has not been produced. The evidence base produced does not establish impacts and mitigation in the same way as a TA; this could make delivering the right infrastructure more complicated than it could be. The movement strategy is considered to generally be in line with the T CPA recommendations regarding modal share targets.

The level of detail to determine whether relatively more, or less, local carriageway is built, compared to what may be expected from normal housebuilder led development is not available.

### **Minerals and Waste Planning**

- Policy - ECC is lead authority. Reference should be made to Essex Minerals Local Plan and

## Appendix 4

Essex and Southend-on-Sea Waste Plan.

- Phasing and Restoration - Welcome the inclusion within the DFD; critical facilities such as the all through school should avoid locations which are dependent on mineral extraction.

### **Waste Management**

- DFD - Welcome the commitment to working towards 100% waste diversion from landfill and a culture of re-use and recycle. Financial contributions will be required to ensure there is adequate capacity in the recycling centres.

### **Flood Risk and Drainage**

- Contacts - Early engagement with ECC as Lead Local Flood Authority is recommended to reduce potential delays.
- Required Documents - Appropriate information for the multiple phases should be submitted along with an executive summary or technical note on the whole drainage system and how this is linked across the phases.
- Drainage - Masterplan does not address the management of surface water drainage and flood risk. The plan on page 19 shows 3 drainage catchments but the drainage core elements on page 81 should be reflected, to delineate the high level space allocation for SuDs provision at the scale of each catchment. The existence and maintenance of existing water features should be considered.
- Design – The Consortium should approach local water companies to deal with water scarcity; consideration should be given to managing water usage during dry summer months. The developer should plan for the stewardship body to adopt the SUDs as ECC is not in a position to adopt the SUDS.

### **Net Zero and Renewable Energy Generation**

- Net Zero - CGC provides the opportunity to deliver net zero development at scale; this should be embraced from the outset. New developments should have sufficient renewable energy incorporated in the design to achieve net zero; there should be a commitment to net zero over the CGC as a whole. Passivhaus is recommended to be incorporated into the design of the CGC.

### **Environment and Green Infrastructure**

- Biodiversity - ECC supports the guiding principles of the CGC, with the aspirations for the delivery of 20% biodiversity net gain and a 50% green infrastructure coverage. The DFD suggests net gain can be delivered on, or offsite. Offsite delivery would require additional expenditure; this is a risk, and it is unclear it has been taken into consideration.
- Delivery - Essential that a site wide approach to the natural environment is undertaken. ECC welcome the landownership blind approach within the DFD; it is important that this is followed throughout the planning process.

### **Draft Infrastructure Delivery Plan**

#### **Public Health and Wellbeing**

- Provision - Welcome the inclusion of physical health service facilities within the IDP, as well as other infrastructure, which can have a positive impact on health and wellbeing.

## Appendix 4

### Education and Early Years and Childcare

- Delivery - ECC are disappointed that the indicative costs given to the consortium are not reflected in the IDP. The indicative costs have not been used and, in particular, the primary school cost has been underestimated; this could have cashflow and delivery implications.

#### (i) Early Years and Childcare, Primary and Secondary Provision

- Delivery Costs - ECC strongly recommends that the indicative cost for education is revised in line with the Developers Guide as follows:

New Build EYCC - Cost per place is £20,508

New Build Primary - Cost per place is £20,508

New Build Secondary - Cost per place is £24,929

New Build Sixth Form - Cost per place is £23,963

ECC initial cost calculations as per the Developers Guide

5 x Standalone 56 Early Year and Childcare settings = 280 places

280 x 20,508 = £5,742,240

3 x Co-located, 2fe Primary Schools and 56 place Early Years and Childcare = 1260 Primary School places

and 168 Early Years and Childcare places

1260 x 20,508 = £25,840,080 Primary, 168 x 20,508 = £3,445,344 EeYCC

Total co-located Primary and Early Years and Childcare = £29,285,424

1 x all-through school = 56 place Early Years and Childcare, 2fe Primary, 6fe Secondary and 2fe 6<sup>th</sup> Form

56 x 20,508 = £1,148,448, Early Years and Childcare, 420 x 20,508 = £8,613,360, Primary, 900 x 24,929 =

£22,436,100, Secondary, 120 x 23,962 = £2,875,440

Total All Through School = £35,073,348

2fe secondary (identified separately) = 120 places x 24,929 = £2,991,480

Total Education New Build Cost = £73,092,492

#### (ii) Special Education Needs and Disabilities

- Provision - ECC will be required to provide special need provision. The proposed development could result in SEND requirements for 63 pupils; this would be significant enough to warrant new provision within a mainstream school or expand SEND provision. SEND provision should be secured via developer contributions, these are set at four times the cost of mainstream places. ECC welcomes references to SEND provision within the IDP but notes that the IDP costs are slightly less for SEND provision and should be revised as set out in the response.

#### (iii) Libraries and Adult Community Learning

- Provision - Welcome the references to libraries in the IDP and that these are to be collected via CIL payments. ECC would welcome discussions on how these contributions can provide improved services and on how the IDP will support ECC's Adult Community learning objectives.



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### **Economic Growth and Skills**

- Provision - Recommend the preparation of an employment skills plan for each OPA. Colleges and apprenticeship opportunities have been considered as standard costs. CCC may wish to seek indicative financial contributions to mitigate more widely on post learning provision.

### **Adult Social Care and Independent Living**

- Provision - Welcome the inclusion of specialist accommodation for a mix of groups within the IDP. Delivering an appropriate mix of accommodation will have a positive impact on the garden communities. Discussions would be welcomed.

### **Digital Connectivity**

- Provision - Reference to broadband within the IDP noted; this is considered a standard development cost so has not been included in the detail of the IDP.

### **Movement and Access**

- Evidence Base - Lack of evidence for the 2,500 dwellings beyond current plan period. Costs are indicative at this stage. An uplift in costs should be expected. Generally, the level of detail is insufficient to independently verify the accuracy of the sums at this stage. No benchmarking checks have been carried out.
- Movement – ECC note that some of the walking and cycling corridors include significant elements in the OPA areas; it is questioned whether these should not be included in the developer costs, like roads. The relative extension of the corridors should be revised to align with the prospective S278 schemes; this would mean a realignment of costs. Improvements in walking and cycling, and their costings need to be reflected in the strategy.
- Inclusion in the IDP - Unclear why some items are not included in the IDP. The premium cost of performance bonds and the cost of commuted sums should be considered; to avoid confusion it is suggested that the delivery payment/trigger columns in table 1b should be delivery/ final payment trigger.

### **Waste Management**

- Provision - Welcome reference to municipal waste within the IDP and discussions on improving services for residents.

### **Flood Risk and Drainage**

- Provision - Flood risk is included within the IDP; more detail required on the proposed drainage strategy.

### **Net Zero and Renewable Energy Generation**

- Provision - Further consideration should be given to ensuring a truly exemplar and sustainable development.

### **Environment and Green Infrastructure**

- Provision - ECC welcomes the inclusion of habitat mitigation and green infrastructure within the IDP. Trees, nature recovery network and landscaping also included.
- Net Gain - No specific costs are attributed to biodiversity net gain. Offsite net gain would likely

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require additional expenditure; it is unclear this has been taken into consideration in the IDP.

### Concluding Comments

- Principle and Collaboration - ECC welcomes the collaborative planning of the CGC. Generally supportive of the direction of the DFD and welcome the opportunity to provide further comments and input to help refine the overarching planning framework; it is critical that the framework is clear in establishing key planning principles for the whole CGC. ECC welcome further discussions with CCC and the developer consortium.
- Concerns and Issues - Support the principle of the DFD but parts require further thought. ECC have reservations about aspects of the DFD and IDP which they feel could undermine the garden community concept and objective of delivering an inclusive and well-designed place. Concerns relate (but are not limited) to climate change, walkable neighbourhoods, liveable neighbourhoods, inclusive education, community cohesion, place keeping, financial contributions and delivery and phasing.

### Essex County Council Historic Environment Branch

#### Comments

27.05.22

- General - The proposed masterplan area has a high potential to contain archaeological remains as attested by the submitted archaeological desk-based assessment, the Essex Historic Environment Record (EHER) and recent archaeological fieldwork.
- Cropmarks - Areas of cropmarks, identified through aerial photography, are present to the north, east and south-west of the proposed masterplan area, and indicate the presence of multi-period archaeological sites; where these cropmark complexes have been investigated previously, they have exposed complex archaeological landscapes and significant deposits, and it is likely that these remains extend into the area of the proposed masterplan.
- Former Quarry Activity (North-Eastern Part of the Site) - The quarrying activity at the north-eastern extent of the proposed masterplan has previously been the subject of archaeological investigation over several seasons of activity since 2003. A late Iron Age/Roman ring-ditch, prehistoric cremation burials, a Bronze Age building and a medieval field system have all been uncovered during archaeological fieldwork in advance of mineral extraction. Further archaeological remains related to these previously uncovered deposits are likely to extend further out into the masterplan area.
- Western Edge - A further archaeological investigation recently carried out at the western edge of the proposed masterplan area, consisting of a geophysical survey and a trial trenching evaluation, has exposed extensive evidence of multi-phase settlement remains. An apparently high-status Late Iron Age/Roman settlement was identified and evaluated during these works, and several other, possibly prehistoric, enclosures were identified, and have yet to be investigated.
- Pre-Planning Work - Substantial sections of the masterplan area will need to be archaeologically investigated at a pre-planning stage, in order to inform any archaeological mitigation strategies. A substantial amount of this archaeological investigation and mitigation work will be carried out in advance of, and in accordance with the previously granted consent for, the mineral extraction activity in the eastern part of the masterplan. Archaeological investigation should be carried out in advance of, and to support any, future planning applications in the remainder of the masterplan to the west.
- Historic Landscape Features - The retention of these features within the design of the masterplan should be a high-priority as set out in the desk based assessment. Multiple historic

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lanes and field boundaries survive within the masterplan area and should be included within the future design of the development as much as possible.

### National Highways

Comments
11.07.22
<ul style="list-style-type: none"><li>• Sustainable Travel – A sustained focus on sustainable travel is required, which is reflected in the plan. The challenge will be to ensure all the facilities, services and infrastructure can come forward as intended, otherwise there is a strong possibility that measures will not be as effective as expected, leading to additional pressure on an already stressed highway network.</li><li>• EV Charging – Careful consideration will need to be given to electric vehicle charging points and the implications of current long charge times. HGV parking needs to be considered, both during the build out period and around industrial areas planned as part of the development.</li><li>• Walking and Cycling – The design should be walking and cycling friendly, including safe, secure and practical spaces for the storage of cycles and associated equipment at both ends of the journey. Thought should be given to electric scooters and delivery robots, currently being used in some parts of the country by the Coop; these do not appear to have been considered in the masterplan.</li><li>• Travel Plan – Beaulieu has had some success with its Travel Plan; this needs to be built upon. The Travel Plan must have a monitor and plan mitigation approach if it is to be successful in driving down unsustainable trips.</li></ul>

### Network Rail

Comments
27.05.2022
<p>The developer must ensure that the development, both during construction and after completion does not:</p> <ul style="list-style-type: none"><li>• encroach onto Network Rail land,</li><li>• affect the safety, operation or integrity of the company's railway and its infrastructure,</li><li>• undermine its support zone,</li><li>• damage the company's infrastructure,</li><li>• place additional load on cuttings,</li><li>• adversely affect any railway land or structure,</li><li>• over-sail or encroach upon the air-space of any Network Rail land,</li><li>• cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future.</li></ul>

### Greater Anglia

Comments
No response.

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### First Bus Essex Buses Ltd

Comments
No response.

### Arriva Buses

Comments
No response.

### Essex Bridleways Association

Comments
27.06.22 <ul style="list-style-type: none"><li>• Equestrian Use – Disappointed and frustrated by the total apparent disregard for equestrians and their requirements; no reference to the word 'equestrian' in the masterplan. The user group appears to have been afforded no apparent consideration in the plan whatsoever.</li><li>• Pedestrians and Cyclists – Great store is placed on these users but nothing for equestrians; in the interests of equality multi-user routes should be considered more widely.</li><li>• Bridleway 213_48 – The bridleway runs to the south of the proposed development and joins the boundary of the proposed development as it rises up alongside The Grove, however, there is no mention of this route in the DFD other than on the site constraints plan. The masterplan lacks imagination.</li><li>• Dukes Wood Nature Park – The Park is proposed within the north-eastern quadrant of the CGC; given this, the EBA query whether there is not an opportunity to extend Bridleway 213-48 in a north-easterly direction to give access to the Nature Park and to then continue the bridleway, or a new multi-user Public Right of Way to the lane network at the north-eastern edge of the proposed development, this giving access to the surrounding area.</li><li>• Connecting Routes – Consideration should be given to a route that would allow equestrians the ability to ride a link route from, and through the Channels Discovery Park, Park Farm Meadows and Dukes Wood Nature Park.</li><li>• Trails – The proposed green spaces are to include running, walking and cycling trails of 2km, 5km and 10km loops; could these not be multi-user and potentially incorporated within the above aspiration.</li></ul>

### The British Horse Society

Comments
No response.

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### Cycling Action Group

Comments
No response.

### Chelmer Cycling Group

Comments
No response.

### Essex Roads Cycling Group

Comments
No response.

### Ramblers Association

Comments
No response.

### Essex and Suffolk Water

Comments
No response.

### Anglian Water Services Ltd

Comments
18.07.22  Anglian Water has been working with the Consortium on a suitable drainage strategy is continuing to engage with them on a regular basis. Reference should be made to the strategic drainage strategy, for both foul and surface water, and links to each parcel feeding into this should be outlined.  Drainage conditions will be recommended to ensure the agreed strategy is delivered.

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### Environment Agency

Comments
26.07.22
No comments.

### UK Power Networks

Comments
No response.

### National Grid

Comments
28.07.22
No comments but would wish to be consulted on site specific proposals which could affect National Grid assets.

### Cadent Gas

Comments
No response.

### Homes England

Comments
No response.

### Mid Essex Clinical Commissioning Group

Comments
21.06.22
<u>Development Framework Document</u>
<ul style="list-style-type: none"><li>15 Minute Neighbourhood Approach – The approach would provide residents with access to most, if not all, of their needs within a short walk or bike ride from their home; this is supported. The location of flexible employment spaces and community facilities within neighbourhood hubs as part of this strategy will contribute to reducing car use, promoting walking and cycling and help to build community.</li></ul>

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- Health & Wellbeing - The consultation material sets out objectives in relation to a range of topics, and key strategies to achieve them. Successfully delivered, the principles described will support the physical and mental health and wellbeing of residents and so are welcomed.
- New Homes - Reference is made to homes being capable of catering for all needs and adaptable over time and 'a home for life' and inclusive and adaptable design are strategies cited; these should, so far as practicable, be applied to all homes in the new community.
- Keyworker & Healthcare Worker Accommodation - A need for key worker/healthcare worker accommodation exists to help address recruitment and retention difficulties that limit healthcare capacity in the area. The high cost of housing in Mid Essex causes an affordability issue for workers in the health and care sector. Provision for this type of accommodation with the Chelmsford Garden Community could contribute to addressing this issue and should be included.
- Equality of Access - The objective to create equal access to the natural environment, employment and education is supported; these factors are wider determinants of health that are important to include in the design of the development.
- Community Provision - The community section of the material identifies that each village centre, one in each of the four villages that make up the overall development, will deliver a range of community facilities which are identified in the infrastructure delivery plan (IDP).
- Public Transport - The ethos set out in the consultation material, that bus travel should not only be available, but will be an essential and preferable alternative to the use of the private car whilst complementary toward the need to switch to active modes of travel such as cycling and walking, is supported. Bus stops, it is agreed should be close to every home. A connected and safe network for pedestrians and cyclists is welcomed with connections to Chelmsford city centre, Broomfield Hospital and Beaulieu Train Station.
- Green & Blue Infrastructure - The proposal for a significant network of green, blue and wild infrastructure including 20km of multi-functional greenways and 3 new destination parks covering 150ha will help to encourage active travel and recreational activity, which are beneficial to physical and mental health and wellbeing.
- Phased Delivery - Delivery of the development is proposed in four phases with each phase relating to one of the four proposed villages and including a neighbourhood centre; other elements of the consultation material mention provision of a primary healthcare facility, none are shown on the phasing and delivery information, this should be rectified to include the proposed healthcare facility in one of the neighbourhood centres.
- New Health Centre Provision – The Health and Community Facilities Technical Appendix assesses the need for health and community facilities and concludes that the population increase proposed justifies provision of a new health centre on the development site. The form of the centre and the services to be delivered are not specified but a commitment is given to discuss this detail with the CCG. The DFD recognises that it will be necessary to consider the scale of the facility, car parking, ambulance parking and the location in relation to services, walking, cycling and public transport routes and whether the facility should be stand alone or form part of a larger community building.

### Infrastructure Delivery Plan (IDP)

- Contributions - The IDP includes contributions towards the provision of primary and acute healthcare capacity; it assumes contributions of £2,050,000 towards primary care, based on a floorspace calculation and £1,375,000, based on a notional contribution per dwelling, towards acute care to be made at occupation of 1,750 and 2,750 dwellings respectively, however, the IDP recognises that it is not possible to accurately determine the build cost or size of new facilities at this stage.
- Mitigation - The Health and Care Partnership agrees that it is appropriate for the development to mitigate its impact by contributing towards primary and acute care capacity. Discussions between the developers, CCC and the Health and Care Partnership regarding the purpose of the healthcare facilities and financial contributions and the triggers for their provision, will be

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welcomed. Flexibility in the obligations will be required, as healthcare needs, models of service delivery and costs will change over the lifetime of the development, proposed to be built between 2025 and 2044.

Given current policy and emerging models of care in the newly forming Integrated Care System, the following initial comments are submitted:

- Form of Contribution - The most appropriate financial developer contribution in relation to delivery of a health and care facility within the site is likely to be the offset of capital against the revenue costs of the lease of the premises.
- Acute Care - The inclusion of a contribution towards acute care is welcomed but, given the higher cost of providing acute over primary care capacity, the larger contribution would be appropriate for acute capacity to mitigate the impacts of the development.
- Ambulance Service Capacity – Capacity will be impacted by the development; the scale and timing of mitigation should be part of the discussion about contributions.
- Residents Service Access - Residents of residential facilities place greater demands on health and care service capacity and so their impacts require specific consideration; as well as financial contributions, mitigation should include digital infrastructure to facilitate access to medical records and collaboration with health and care services on training and developing best practice.
- Indexation - All financial contributions should be BCIS index linked.
- Timing - Triggers for contributions need further consideration.

### Concluding Comments

- Adoption of a master plan that includes design and delivery proposals that will support healthy lifestyles is welcomed. The Health and Care Partnership requests continued involvement in this process.
- The inclusion of a healthcare facility within the community and financial contributions are the most appropriate means of the development mitigating its impact on healthcare capacity. Early discussion regarding planning obligations would be welcomed.

## Essex County Fire & Rescue Service

### Comments

07.06.22

#### Access

- Access for Fire Service purposes has been considered in accordance with the Essex Act 1987 - Section 13.
- Essex County Fire and Rescue Service is not satisfied with the proposals as no plans has been provided for the Brigade to assess if the proposals meet the content of B5 of Approved Document B of The Building Regulations 2010 with regard to access for fire service vehicles and firefighting purposes. Plans should be submitted detailing compliance.

#### Building Regulations

- Building work should comply with the relevant requirements of the Building Regulations. Applicants can decide whether to apply to the Local Authority for Building Control or to appoint an Approved Inspector.
- Local Authority Building Control will consult with the Essex Police, Fire and Crime



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Commissioner Fire and Rescue Authority (hereafter called "the Authority") in accordance with "Building Regulations and Fire Safety - Procedural Guidance".

- Approved Inspectors will consult with the Authority in accordance with Regulation 12 of the Building (Approved Inspectors etc.) Regulations 2010 (as amended).

### Water Supplies

- Additional water supplies for firefighting may be necessary for this development. The architect or applicant is urged to contact Water Section at Service Headquarters, 01376 576000.

### Sprinkler Systems

- Clear evidence exists that the installation of Automatic Water Suppression Systems (AWSS) can be effective in the rapid suppression of fires. Essex County Fire & Rescue Service therefore uses every occasion to urge building owners and developers to consider the installation of AWSS. ECFRS are ideally placed to promote a better understanding of how fire protection measures can reduce the risk to life, business continuity and limit the impact of fire on the environment and to the local economy.
- A risk-based approach to the inclusion of AWSS, even when not required under the Building Regulations guidance, can substantially reduce the risk to life and of property loss. Developers are encouraged to use them to allow design freedoms, where it can be demonstrated that there is an equivalent level of safety and that the functional requirements of the Regulations are met.

## Police - Designing Out Crime

### Comments

26.06.22

Essex Police recommend adopting crime as a material consideration and the foreseeability of crime throughout the development; in doing so it will maximise upon the opportunity to apply 'Crime Prevention Through Environmental Design' (CPTED) practices.

### Proposed Masterplan Observations

Crime prevention measures will need to be designed in such a manner that they feel subliminal to the end user of the space; Essex Police would recommend that developers contemplate the following within the architectural design of the scheme:

- Access & Movement – Places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security.
- Structure – Places that are structured so that different uses do not cause conflict.
- Surveillance – Places where all publicly accessible spaces are overlooked.
- Ownership – Places that promote a sense of ownership, respect, territorial responsibility and community.
- Physical Protection – Places that include necessary, well designed security features.
- Management and Maintenance – Places that are designed with management and maintenance in mind, to discourage crime in the present and future.

Essex Police would recommend consideration of the following, having reviewed the Illustrative Masterplan:

- Bus Access Gates – Discussion of the design and specification of the bus access gates and in

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addition, that consideration may be requested for Emergency Service Access through this network.

- T2 Hangar and Romney Hut – An understanding of the intended purpose for this heritage asset to ensure that the proposed development would not be detrimental to it.
- Location of the Travelling Showpeople Site – Further consultation regarding the location, proximity and accessibility of the proposed site. Consideration needs to be given to the close proximity of the site to a subsequent proposal outside of its limits to ensure relevant consultations with Essex Police and an integrated co-existence between the site and the local community.
- Roads Policing Consultation – Having regard to the magnitude of the proposed infrastructure required to support the development, liaison should take place with the Roads Policing Team regarding any potential impact on the road network.
- Construction Considerations – Having regard to the proposed phased construction of the development, a robust security regime will be fundamental to ensure the development does not encourage crime. Security plans and policies will be required not only for the various land parcels, but offices, mechanical plant, machinery, building supplies, tools and other vehicles.

### Guiding Framework Principles

#### **Movement Strategy**

- Road Infrastructure – Welcome the commitment to embodying safety and security when designing the road infrastructure; consideration should be given to a safe system approach when designing local roads in and around the development taking account of various road user groups.
- Emergency Service Access – Consideration should be given to ensuring emergency service access is obtainable throughout the development. Emergency vehicles should be able to gain rapid access to any incident occurring within the whole development and surrounding neighbourhoods.
- Roads Policing Team – Early engagement with the DOCO and Roads Policing team is recommended to discuss the more detailed aspects of the development with the individual developers to ensure the safety of all road users.
- Bus Gates – Welcome discussions regarding the specification, operations and proposals for the bus gates to mitigate against opportunities for crime and other forms of abuse.
- Bus Stops – The principles of the Safer Bus Station Scheme should be applied to design and layout of bus stops and stations and accreditation sought. The national accreditation provides operations of stations, interchanges and coach stations with an opportunity to improve security and reduce crime and disorder.
- Mobility Hubs – The proposed inclusion of a number of hubs and the importance placed on aligning the development to neighbouring areas is acknowledged. The adoption of the 'Safer Bus Station Scheme' and safe and secure cycle storage would be welcomed.

#### **Bus Provision**

- Incentives – Welcome the opportunity to provide personal safety and crime prevention advice within the dedicated travel pack.

#### **Active Movement, Walking and Cycling**

- LTN1/20 – The application of the 'safe system approach' ensuring the safety of all road users is welcomed; it is imperative that any enforcement strategies such as parking enforcement and low speed limits are self-policing and enforceable. Emergency services should not be overburdened to overcome inadequacies in safety management, access control or enforcement.

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### **Parking, Vehicle Access and Mobility Hubs**

- Limitation of Car Use – Parking provision should not restrict emergency service access and any enforcement procedures should be detailed within policy.
- Sustainable Infrastructure – Consideration should be given to the incorporation of safe and secure facilities for alternative means of transport such as charging points, motorcycles and mobility scooters and with this, identification of a series of potential risks and opportunities for crime, should the facility be poorly designed.

### **Landscape Strategy**

- Public Realm – The importance of creating a sense of place and providing accessible services and facilities which encourage sustainable travel is acknowledged, however community spaces and the broader public realm should not become a central point for anti-social behaviour.
- Outline Planning Applications – Prior to the submission of the applications discussions are encouraged to consider:
  1. Subliminal Crime Prevention – Design of public realm spaces are designed where safety and security are subliminal to the user of the space, green and blue infrastructure and appropriate landscaping plans with regard to the use and management of the proposed public realm spaces and play areas.
  2. Landscape Considerations – Landscape provision is carefully considered across the site with the planting designed to take full account of all other opportunities for crime which it may generate.
  3. Lighting Considerations – Coordination of the landscape architect and lighting designer plans to avoid conflict between lighting and tree canopies.
  4. Materials – Careful consideration around materials used for external furniture and aesthetics eg: planters in gardens to ensure the risk is commensurate and fit for purpose ie: vandal, graffiti and arson resistant.
  5. Management and Maintenance – Development of a robust management and maintenance plan, which would be pivotal for the successful operation of the development ensuring the health, wellbeing and safety of the community and those that utilise the facilities within it. A robust layered management plan to self-police the facility and provide a level of clarification as to the means to mitigate any unwanted activity.

### **Cultural Heritage**

- Heritage & Listed Buildings – Heritage indirectly features within designing out crime to ensure that any developments are protected from crime and anti-social behaviour. Measures should be put in place at an early stage to ensure that development does not become detrimental to a heritage asset eg: an instance that once had good natural surveillance and passage of the public, becomes placed within an isolated location with little natural surveillance.

### **Open Space, Play and Sport**

- Design & Layout – Specific regard to be given to the design and layout of landscape plans, play areas, residential and public realm space to avoid it becoming conducive to crime and anti-social behaviour and to ensure it enhances the health and wellbeing of all.

### **Waste, Energy and Utilities**

- Safe Access Paths – Inclusion of safe access paths within street design to allow for future resilience to collection services and transfer of activities is welcomed to avoid the perception and fear of crime.
- Waste Storage Facilities – Facilities should consider (i) safety measures within their design, (ii)

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appropriate access and egress, (iii) medical waste storage, (iv) mitigation against excessive permeability within waste storage facilities and the (v) location of waste bins within the public realm.

- Lifespan of Materials & Waste Generation – The Secure by Design Police Preferred Products are recommended throughout all components of the building; this will meet required security standards but also assist in achieving sustainability goals as products are tested ensuring the lifecycle and span of building materials and security hardware eg; doors and windows.

### **Health and Community Infrastructure**

- Health Impact Assessment & Livewell Accreditation Scheme – The requirements for both are fully supported. Mitigation of the opportunities for crime is concerned not only with the reduction and prevention of injury and crime but also with building strong, cohesive, vibrant and participatory communities.

### **Stewardship**

- Stewardship Bodies – Imperative to address the need for a ‘capable guardian’ across the development; this can include robust physical target hardening measures such as access control systems and CCTV, to a public facing guardian, both of which amalgamate to maximise the perception of safety (for residents) whilst minimising criminal opportunity (target hardening).
- Management of Open Space and Recreational Resources – Landscape provision should be carefully considered across the scheme. Planting design to take full account of all other opportunities for crime that it may generate and be supplemented by practiced management and maintenance plans.
- Accessible Green Infrastructure and Public Realm – Appropriate plant and tree species / cultivars should be utilised and consideration given to growing conditions and heights; this extends to the development of a robust management plan with consideration of maintenance budgets from the outset.

### **Design Code and Framework**

- Design Code – The significance placed on the implementation of a Design Code is recognised; this should be viewed as an opportunity for the community to thrive and become a vibrant location for people to want to live and visit, whilst achieving an ambitious long term vision that delivers high quality and sustainable development.

## **Chapter 4 – Movement and Access**

- 4.1 Movement and Access – Connectivity, natural surveillance and territorialisation should be balanced across the development.
- 4.2 Access Points – Careful consideration to be given to the design of access and egress points as excessive permeability into both buildings or public open realm space may incur the potential for crime and anti-social behaviour.
- 4.4 Street Hierarchy and Active Travel Routes – The benefits of passive surveillance should be maximised however, when addressing safety and security in street layouts and footways, designing out crime should be viewed as a broader package of works eg: landscape design, lighting and layout of homes.
- 4.5 Cycle and Pedestrian Network – The layout, orientation and position of dwellings adjacent cycle and pedestrian routes, public rights of way and accessible routes should be considered to increase the opportunity for natural surveillance, community interaction, engagement, participation and environmental control.
- 4.7 Vehicular Parking – Vehicle parking areas should encompass various security components eg: lighting, landscaping and access and egress considerations; this will need to be reflected in

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the Design Code.

- 4.8 Cycle Parking – Consideration should be given to the security specification of external storage facilities and cycle security both for residential dwellings and communal stores.

### Chapter 5 – Built Form

- 5.10 Building Heights – Consideration should be given to access, egress and movement throughout the residential quarters, and where appropriate, compartmentalisation measures to prevent unauthorised intrusion and anti-social behaviour.

### Chapter 6 – Detailing the Place

- 6.1.1 Hard Landscape Materials – Careful consideration to be given to the materials used for external furniture and aesthetics such as seating, planters and play equipment to ensure they are risk commensurate and fit for purpose eg: vandal, graffiti and arson resistant.
- 6.1.2 Street Furniture Materials – Materials used for street furniture should reflect the crime risk assessment and consider, where appropriate, additional security measures or risk commensurate measures to ensure that any street furniture can withstand multiple crime types and anti-social behaviour inclusive of anti-skateboarding measures.
- 6.1.4 Planting Strategy – The design of all public realm spaces should balance appropriate levels of connectivity with permeability and not encourage crime and anti-social behaviour. Discussions to ensure appropriate alignment to the wider connectivity and designed public realm, ensuring spaces are designed for a safer future is encouraged. Public realm spaces should not become a central point for anti-social behaviour or any unwanted activity, thus having an adverse impact on surrounding communities.
- 6.1.7 Lighting Strategy – Safe public spaces incorporating good, consistent and well designed lighting throughout the development whilst maximising natural surveillance opportunities are encouraged. Lighting provision must provide uniform illumination with due consideration to spill of light and ecological considerations. Detailed lighting design, evidencing current relevant standards or relevant industry standards should be supplied as evidence. Landscape architects and lighting designers should coordinate their plans to avoid conflict between lighting, planting strategies, CCTV, tree canopies and conservation. A sensitive approach to lighting is required, ensuring no glare to CCTV cameras or security. Light fittings should be protected, where vulnerable, to vandalism. The size and magnitude of the scheme and its phased construction is understood however, lighting should be effective from the start and not considered in isolation of the various stages.
- 6.1.8 Wayfinding Strategy – Appropriate wayfinding such as residential signage will aid access and movement without compromising security.
- 6.2.1 Boundary Treatment Types – Boundary delineation between private and public realm space needs to be clearly defined with any open spaces displaying features, which mitigate any potential unauthorised access.

### Chapter 7 – Technical Standards

- Play Provision Strategy – Careful consideration to be given to the materials used for external furniture and aesthetics such as seating, planters and play equipment to ensure they are risk commensurate and fit for purpose ie: vandal, graffiti and arson resistant.

#### Secure By Design (SBD)

- Accreditation – Welcome all new homes, schools/academies, health provision and retail/commercial provision achieving the applicable Secured by Design accreditation. SBD ensures minimum security standards are adhered to, whilst supporting sustainability and carbon reduction agendas.

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- Carbon Cost Savings – Substantial carbon cost savings are associated with building new communities to SBD and SBD Preferred Product Standards.
- Consultation – Prior to submission of the outline planning applications, the Designing Out Crime team would welcome consultation regarding embedding designing out crime practices within the project.

## Natural England

### Comments

23.06.22

#### Development Framework Document (DFD)

- DFD – The document provides a very clear and well-structured framework for the delivery of the Chelmsford Garden Community (CGC) with a cohesive narrative from strategic level context through to design codes for specific character areas.
- Vision – The aspiration to develop "*A place to live and work alongside nature, one that integrates a symbiotic natural landscape with an enhanced and resilient ecological network*" is welcomed. The vision encompasses ambitious targets for the delivery of benefits for nature and access to nature which are also welcomed; these include an aspiration for the delivery of 20% Biodiversity Net Gain within the site, 50% of the site area to provide Blue and Green Infrastructure and a target for the new community's residents to undertake 60% of trips by non-car and active modes of travel.
- Nature Recovery - The associated Nature Recovery at CCG explains the hierarchy of priority actions that underpin the approach taken to delivering nature recovery alongside the development and explains the basis for the siting of key elements of larger-scale green/blue infrastructure within CGC, the connections between them and the access to the wider countryside. Key deliverables are ambitious: 238.5ha of green/blue infrastructure (including 108ha Dukes Wood Country Park, 32ha Channels Discovery Park, 11ha Park farm Meadows, 78ha natural and semi-natural open space).
- Mineral Extraction - Existing and planned mineral extraction operations place significant constraints on the phasing of the delivery of the CGC and dictate the order in which the 3 outline applications are likely to come forward. The mineral extraction programme is also a key determinant of the phasing of the delivery of the Green Infrastructure that will support CGC, and this is an aspect of the Masterplan that may require further exploration. The planned quantum of green/blue infrastructure (GI) is significant, however it will be important to ensure that the delivery of GI keeps pace with the occupation of the housing and the associated increase in the population of the CGC. Natural England has some concerns about the phasing of the development as set out within the Infrastructure Delivery Plan (IDP).

#### Infrastructure Delivery Plan (IDP)

- Dukes Wood Nature Park - Table 1b indicates that the most significant element of GI (Dukes Wood Nature Park) is not required to be delivered until (at the latest) 75% of the housing units within the Countryside and L & Q scheme (Zone 2) has been occupied; as a consequence of the alignment with mineral extraction activity, the Countryside and L & Q scheme is the final phase of housing development (anticipated 2040-2044), which will mean that much of the new population will be reliant on the smaller elements of GI provision (Channels Discovery Park and Park Farm Meadow) for many years. Given the scale of development proposed, the phasing would constrain the amount of GI available to and within reasonable walking distance of the residents of CGC.
- Suitable Alternative Natural Greenspace (SANG's) - The proposed phasing could also limit the

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role that CGC could play in the delivery of Suitable Alternative Natural Greenspace (SANGs) for the Habitats Sites on the Essex Coast. The Development Consortium are aware of the adopted Essex Coast Recreational Avoidance and disturbance Mitigation Strategy (the Essex Coast RAMS) and the tariff requirements of the Essex Coast RAMS SPD, however, it is noted in Table 1b that the RAMS contribution is not to be provided until (at the latest) 75% occupation of all 3 schemes, whereas the SPD seeks to secure the relevant funding "no later than on the commencement of each phase of development". The need for SANGs provision within a development is a consideration that will need to be explored through the project level Habitats Regulations Assessments to be undertaken in the context of the outline planning applications for the CGC.

### Essex Wildlife Trust Ltd

Comments
No response.

### Wilderness Foundation

Comments
No response.

### Historic England

Comments
19.08.22
<ul style="list-style-type: none"><li>• Movement – The document is excellent at describing how it intends to be cycle and pedestrian friendly and this is to be applauded, however, cars will be a feature of the new community and it is unclear how they will move around the site and where they will park. Vehicle infrastructure should be designed into the scheme from the beginning to enable it to integrate successfully and not appear as an afterthought.</li><li>• Arrangement of Development – The development is designed to face into green and public spaces, but the rears of the buildings must not be relegated to utilitarian and non-designed elevations, in particular where the development faces areas of historic interest such as opposite the Little Waltham Conservation Area.</li><li>• New Hall – The Grade I listed New Hall is surrounded by a Grade II listed Registered Park &amp; Garden. The development has been designed to integrate some of the former parkland features and field boundaries, but it could do more to recreate former boundaries and integrate these into street patterns and walkways.</li><li>• Parameter Plans – The building density Parameter Plan shows medium density housing closest to the Little Waltham Conservation Area and the Registered Park &amp; Garden at New Hall School; if the density were dropped to lower density around heritage assets, this could assist with the feel of some of their more historically rural setting.</li><li>• Process – Each outline planning application will be followed by a master planning process and accompanied by an ES containing archaeological, landscape and heritage statements; this gives opportunities to comment upon detailed heritage impacts as the applications are submitted.</li></ul>

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### Sport England Eastern Region

Comments
<p>21.06.22</p> <p>Sport England's planning objectives are to protect existing facilities, enhance the quality, accessibility and management of existing facilities and to provide new facilities to meet demand.</p> <ul style="list-style-type: none"><li>• Community Sports Facility Provision – The evidence base is contained in Policy S9 of the Chelmsford Local Plan, Strategic Growth Site Policy 6, CCC's Playing Pitch and Outdoor Sports Strategy (2016) and Indoor/Built Sports Facility Strategy (2016). The Strategy documents identify a range of existing and future deficiencies in facility provision. Given the local planning policy and evidence base context and in accordance with paragraph 98 of the NPPF, a robust local basis exists for justifying the provision of outdoor and indoor community sports facility provision within the development proposal.</li><li>• Outdoor Sports Provision – The DFD approach provides for outdoor sports through three sports hubs (page 88); involving two dedicated sports hubs in the Great Belsteads and Dukes Wood areas of the development and the shared facilities at an 'All Through School' in the Park Farm Village. The principle of the approach is welcomed as this would provide three sports hubs, each of sufficient size to offer the flexibility to respond to a range of community pitch needs and be financially sustainable. The approach also allows the sports hubs to be phased as the development is built out, which would help ensure facilities are available as the different phases of the residential development are implemented; this is pertinent in view of the expected phasing covering a 20 year period. The Illustrative Masterplan is conceptual; as such Sport England consider it inappropriate to provide detailed comments on the design and layout of the sports hubs at this stage.</li></ul> <p>The following comments would need to be considered before the masterplan is finalised and outline planning applications submitted:</p> <p><u>Outdoor Sports</u></p> <ul style="list-style-type: none"><li>• Outdoor Sports Strategy – The preparation of an outdoor sports strategy to support the outline planning applications is welcomed as this will provide a strategic framework for considering the applications; this should be prepared in consultation with Sport England, the sports governing bodies and CCC.</li><li>• Football – The proposals for football are indicative at this stage, however, the Essex County Football Association has advised that the highest priority football facility need in Chelmsford is for an additional 3G artificial grass pitch, which has been identified in both the Chelmsford Playing Pitch Strategy and the Chelmsford Local Football Facilities Plan. The proposal to provide two floodlit 3G artificial grass pitches (AGP's) on the All Through School site is welcomed, however, consideration should be given to substituting some of the grass pitch provision in the other two hubs with 3G AGP's. Future proofing the sports hubs is referenced in page 161 of the DFD; in this context 3G AGP's would be justified because the direction of travel for community football facility needs is to provide more 3G AGP's. The Great Belsteads and Dukes Wood sports hubs should be future proofed to ensure that they are suitably located to accommodate a floodlit AGP, regardless of whether a 3G AGP is provided initially. The location needs to have regard to planning and environmental considerations such as ecology, noise, lighting impacts.</li><li>• Rugby – The proposals for rugby union may be indicative however the value of providing a single rugby pitch in the Great Belsteads sports hub is questioned; unlike other sports, rugby union is an entirely club based sport and rugby clubs do not usually use remote sites, especially</li></ul>



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single pitch sites. A financial contribution towards improving the capacity of the rugby pitches at Coronation Park, where Chelmsford RFC are based would be considered more appropriate than on-site provision being made.

- Cricket – The provision of a cricket square and outfield in the Great Belsteads sports hub is welcomed. Given the current and expected future demand for additional cricket facilities within the Chelmsford area, consideration should be given to the provision of a second square at the sports hub, or at the Dukes Wood sports hub, as this would help with the all year sustainability of the sports hub. The cricket square should be supported by an artificial wicket and training nets to provide practice match and training facilities to support the natural turf square.
- Hockey – Off site provision in the form of enhancing off-site facilities at Chelmer Park would be more appropriate than additional on-site provision.
- Tennis – The provision of multi-purpose courts at the Dukes Wood sports hub is welcomed, however, provision for tennis should also be made in the development's main parks to encourage informal tennis. The All Through School multi-use games area should also be designed for community use; these measures would help allow the additional tennis needs (and the needs of other court based sports) generated by the earlier phases of the development to be met, given that the Dukes Wood sports hub would not be delivered until the later phases of the development.
- All Through School – Natural turf pitches proposed at the school for community use would need to be in addition, to the natural turf pitches proposed to meet the school's educational needs as the pitches would not have the carrying capacity for meeting educational and community needs. The outline planning applications should consider how a sports hub, shared with the all through school, would be managed as the success of the approach would be dependent on the facilities being available and suitably maintained for meeting their educational needs. The principle of the approach is welcomed however, it is requested, that this be discussed with ECC and CCC to determine whether the model can be pursued in practice. A high level options appraisal may need to be undertaken to inform this process. Should the school manage the sports hub, a formal community use agreement would be an essential requirement of any planning permission.
- Playing Field Construction and Design – Reserved matters would need to be supported by feasibility studies which assess the ground conditions of the sites and propose a suitable scheme for addressing these to ensure the sports pitches will be fit for purpose. The design and construction of the sports pitches will be expected to accord with Sport England's Natural Turf for Sport design guidance.
- Pavilions – The Dukes Wood sports hub will require a sports pavilion, as well as the Great Belsteads sports hub (page 88 of the DFD only references a pavilion at the Great Belsteads sports hub). The 'All Through School' would also need to make provision for changing rooms and ancillary facilities to support the outdoor sports facilities proposed within the sports hub. DfE Guidance in BB103 usually only makes provision for a single set of changing rooms in a secondary school site to support educational needs but separate indoor and outdoor changing facilities will be required if the school is to include outdoor sports facilities that will be dedicated for community use. The design and layout of the proposed pavilion facilities in the sports hubs will be expected to accord with Sport England's Clubhouses Design Guidance.
- Outline Planning Applications – Discussions should take place with CCC and Sport England regarding the outdoor sports facility proposals before applications are submitted so that advice can be provided and any issues addressed in advance.

### Indoor Sports Provision

- Sports Hall – The DFD (page 104) refers to the masterplan being informed by Sport England's Sports Facility Calculator, with the suggestion that a four court sports hall be provided. Clarity is required as to where the sports hall would be accommodated on site; the obvious opportunity is as part of the All Through School as the school will require access to a sports hall. The option

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would only be acceptable were the sports hall designed as a community sports hall in accordance with Sport England's design guidance rather than a school sports hall being provided in response to DfE guidance. A community four court sports hall has different dimensions to a school sports hall and different ancillary facility requirements. Community access would also need to be secured.

- Indoor Sports Facilities – No reference is made to how other indoor sports facility needs generated by the development would be met eg: swimming pools, health and fitness suites (gyms) and activity studios. The capacity of existing off-site facilities could be enhanced to address additional needs. Sport England's established Sport Facilities Calculator can help to provide an indication of the likely demand that will be generated by a development for certain facility types. The SFC indicates that a population of 13,300 (based on the estimated population referenced on page 103 of the Development Framework Document) in Chelmsford City will generate a demand for 0.95 sports halls (£2,445,018), 0.68 swimming pools (£2,678,390) and 0.21 rinks of an indoor bowls centres (£83,254). Detailed calculations are provided within a word document appended to the consultation response.
- Swimming Pool Provision – The development would generate demand equivalent to 0.68 swimming pools which is a substantial proportion of a new facility. Given the scale of the additional demand, there would be concerns over whether the existing swimming pools in Chelmsford would have sufficient capacity, to accommodate this scale of demand, together with demand from other planned major developments. The Council's Indoor/Built Sports Facility Strategy was prepared over 6 years ago and would not account for changes in demand in the intervening period, or the major change in supply associated with the recent redevelopment of the Council's Riverside Leisure Centre, which provides the principal community swimming pool in Chelmsford. CCC is requested to review swimming pool needs in Chelmsford to assess whether existing swimming pools would have the capacity to accommodate the additional demand associated with this development together with the other major developments planned in the Local Plan. One option would be the provision of a conventional sized swimming pool in the development, that could be part funded by other smaller major developments, while another option would be a neighbourhood sized swimming pool. Sport England and Swim England have recently published details of a Leisure Local concept to assist in this regard; details have been attached to the consultation response.
- Fitness Provision - A development of this scale would also justify on-site health & fitness (gyms) and activity studio provision; provision could be accommodated as a dual use facility on the All Through School site, or through a separate leisure or community facility (such as the Leisure Local concept).
- Indoor Facility Needs – Some indoor facility needs can be met in part through multi-purpose community facilities such as community halls, places of worship and pavilions. Sport England's Village and Community Halls design guidance may be helpful in this regard.

### Infrastructure Delivery Plan

- Contributions – The IDP checklist refers to indoor sport being secured through CIL; agreed on-site indoor sports provision should be secured through a planning obligation to ensure its delivery in practice.

### Other Matters

- Active Design Guidance - Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design which is consistent with section 8 of the NPPF. Sport England commends the use

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of the guidance in the master planning process for new residential developments. The Essex Design Guide (February 2018) has embedded the Active Design principles into guide.

- Livewell Accreditation – The development is being designed to support the health and wellbeing of residents and the developers are supportive of implementing CCC’s Livewell Accreditation Scheme; this is welcomed by Sport England. The conceptual proposals set out in the document in relation to active travel, green and blue infrastructure are also welcomed. The Active Design guidance includes a checklist that can be applied to developments; it is recommended that the checklist is used in the preparation of outline planning applications. The checklist is also being incorporated into the latest Health Impact Assessment guidance prepared by ECC.

### Essex Lawn Tennis Association Attention

Comments
No response.

### England Hockey

Comments
No response.

### Essex Football Association

Comments
No response.

### Rugby Football Union

Comments
No response.

### England Cricket Board

Comments
No response.

### Local Residents

Comments
Fifteen responses have been received from local residents and neighbours. The neighbour representations include a petition signed by residents of Domsey Lane and comments from Aquila Holdings Ltd.

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The comments raised the following matters.

### Principle of Development

#### Objections

- Horrified at the prospect of thousands of houses in addition to the existing at Beaulieu and Channels. No more housing is required.
- Development is not a garden community but rather a large house estate. Chelmsford is big enough and there is no good reason to make Chelmsford any bigger.
- CCC should consider the interests of the community and not vast profits for the development industry.
- Proposal should be put to referendum of local residents.
- Impact would be widespread.
- Urban sprawl is wrong; agricultural land needs to be conserved.
- Scar on the landscape and only a benefit to the councils targets and developers pockets.
- Wrong location for the development.
- Lack of public consultation on the development.
- Wanton destruction of countryside.

#### Support

- Exceedingly well planned and balanced development incorporating plenty of green space and access to public transport; particular positive is the provision of small units suitable for business.
- Village concept is in keeping with the area.
- Support the progress being made with the Garden Community and the steps to bring it forward.

### House Design and Layout

- Solar panels should be accommodated on every roof slope.
- EV charging points for each house.
- Houses should be more spread out than the Beaulieu development.
- Development should be designed with a rural feel; unlike the current red brick and black clad buildings at Channels.

### Air Pollution

- Increased air pollution for existing residents.

### Traffic and Highways

- Traffic will increase along Braintree Road.
- Traffic issues currently at Beaulieu; development will increase traffic on Essex Regiment Way.
- No part of the plan addresses existing traffic issues in Little Waltham.
- Unclear how village bus service will be integrated into the existing infrastructure.
- RDR2 and the North-East Bypass should be required to open before construction begins on the CGC.
- No consideration has been given to the Protected Lanes; this should be reviewed.
- Traffic flow on protected lanes should not be increased.
- Traffic in Little Waltham and Essex Regiment Way should be closely monitored.
- Back Lane should be altered to make it one way.

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- Traffic causes a noise nuisance.
- Lack of supporting infrastructure including the new train station.
- Domsey Lane should be protected from additional traffic.

### Health Service

- Health service is already stretched.
- Adequate community facilities should be provided.
- Development should be self-sufficient so there is no added pressure to an already stretched NHS.

### Cycling

- Cycle networks should be provided to key developments such as the hospital and train station.
- Development should recognise the importance of being able to provide continuous networks of footpaths and cycleways.
- The Essex Regiment Way sustainable travel corridor is poor and will not encourage cycling.

### Landscape, Boundaries and Planting

- Adequate planting is required to mitigate the impact of the development.
- Treatment of boundaries with Peverels Farm should be carefully considered.
- Proposal would be disastrous to wildlife, insects, plants and trees.
- Destruction of a huge area of natural habitat

### Heritage

- DFD recognised the important heritage views, especially the views between Powers and Peverels Farm.
- Concerns over the reliance of the masterplan on land with a variety of landowners.

### Domsey Lane

- A petition on behalf of 19 of the 20 families on Domsey Lane between Channels Golf Club and Peverels Farm has been signed asking for the road to be blocked for full vehicle access prior to any new development in the area. The petition reads *'We as residents of this historic and previously quiet lane request that Domsey Lane is blocked to traffic prior to any new development in the area.'*
- The petition suggests that the road is closed at some point below Peverels Farm.
- The restriction would allow continued and safe used of the road for pedestrians, cyclists and horses.
- Relationship between Peverels Farm and the CGC is important with a number of cycle and walking routes across land associated with the farm. Connectivity across the masterplan could be limited by intervening land which does not fall within the masterplan.
- Medium density on the land around Peverels Farm is considered appropriate.
- Future land at Peverels Farm could be developed to a similar density.
- The treatment of boundaries around the masterplan area will be important to ensure connectivity.
- Important heritage views between Powers and Peverels Farm should be protected.
- Open to a collaborative approach over potential future development of Peverels Farm.

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### Aquila Comments

#### **Context**

- Aquila's specific property interest relates to the adjacent to the Masterplan area at Regiment Business Park (RBP)

#### **Proposed Development Adjacent to RBP**

- The Masterplan shows the CGC Innovation Hub immediately to the north of RBP and the accompanying illustrative plan in the Development Framework Document suggests that built development will closely approach the RBP boundary. Insufficient account taken of the nature of the uses in the northern portion of RBP, including the Waste Transfer Station, which is a protected facility in the Essex Waste Local Plan.
- The quantum of development shown would not be achievable with proper recognition of this constraint.
- Unconvinced that the form of development could be viable given the knowledge of ground conditions. Evidence base work pays scant, if any attention to ground conditions.
- CGC Innovation Hub component is an important part of the Council's Strategic economic objectives, it should be located elsewhere within the Masterplan Area to ensure its delivery.

#### **Development at Great Belsteads Village**

- The concept of a village centre, forming a point of entry to CGC from Essex Regiment Way is welcomed, however little is made of the clear locational opportunity which this presents for a wider range of uses. Non-residential village centre uses are so constrained that the range of facilities, which can be provided on either a commercial or community basis will be severely limited – if indeed if they are secured at all – reference to recent experience at Channels.
- Disappointed at the lack of recognition of the opportunity which exists to secure commercial leisure provision at Great Belsteads, which would serve both the Masterplan Area & Beaulieu / Channels on a highly sustainable basis. CCC and the Consortium will be aware that there is strong operator interest in such provision to be delivered at an early stage and this interest should surely be harnessed for the benefit of the existing & emerging community.

#### **Employment Development – General Comments**

- Adequacy of provision for the full range of employment uses with the wider CCC area in other contexts has been considered; the restricted nature & quantum of the proposed provision at the proposed Willow Hill Employment Hub can only serve to heighten this concern - particularly in light of evidence base work by BNP Paribas, which demonstrates the demand within the industrial / logistics sectors.
- The provision of local workspace is welcomed from the standpoint of SMEs and ease of physical integration; the Garden Community does not tap into this economic driver.

#### **Wider Integration to Rural Areas North-East of Chelmsford**

- The Masterplan shows an extensive network of footpaths and cycleways with the Garden Village but none linking to the north-east or eastern area. Cyclists and pedestrians from Terling or Great Leighs areas wishing to access the Garden Community or new station would have to use Waltham Road and travel through Boreham to the Boreham interchange. Any pedestrians or cyclists from Chelmsford, or the Garden Community would have to travel the same torturous route in reverse to access the countryside. Links from, and to the Garden Village to Waltham Road and Cranham Road must be provided.
- Connection of the Police Road Traffic premises directly to the Garden Village and bypass would

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reduce the traffic on Waltham Road and Cranham Road and benefit the highway network.

### Halley Developments Ltd

#### Comments

25.07.22

- Express overall support for the DFD and their commitment to delivering the CGC.
- Support the approach towards identifying 5,500 units on the allocated site.
- Note the illustrative nature of the DFD and recognise that the exact layout of the development may vary at a later stage.
- Halley Developments are fully committed to early delivery of key infrastructure, specifically RDR2 so that development can proceed as soon as possible.

#### RDR2

- The route indicated in the DFD is considered indicative and may not follow the alignment in the DFD.
- RDR2 may vary slightly to accommodate site specific matters such as trees, ponds and site level restoration.
- Detailed matters and layout to be set out in future discussions.

#### Heritage

- Support development north of RDR2 as shown in the DFD.
- Currently undertaking analysis of the site and preparing the relevant documents.

#### Discovery Park

- Committed to the delivery of Discovery Park North.
- Overall location and layout considered to be indicative.
- Formal layout and details to be agreed at a later stage

#### Phasing

- Development of Powers Farm in the first phase between 2025-29 is fully supported.
- Aim for delivery within the first phase as indicated in the DFD.
- Imperative that there are no infrastructure impediments to prevent the delivery of the scheme.

#### Conclusion

- Principles of the DFD to be brought forward in the OPAs.