

TCB Garden Community Regulation 19 consultation Comments on behalf of Ardleigh Parish Council

We note that in the introduction to this consultation 'it is recommended that comments be focused on whether the Plan is sound and legally compliant' as 'there have been previous opportunities for more general comments and feedback on the Plan which have been considered by the Councils'.

We have, nonetheless, included some general comments and feedback in our representations, since there were very substantial changes to the proposals affecting our Parish between the publication of the Draft Plan and the publication of the Masterplan, following Regulation 18 representations.

Some of these changes were effectively brand new proposals (such as an extension of the broad development area or the 'removal' of any road link between the Crockleford development and the proposed link road) where there has been no real opportunity for comments to be made and considered.

We raised concerns and asked for more time at the Joint Committee meeting on 27 February, however, the Masterplan was approved without amendment by that Committee and then by the respective Councils. We believe that there was insufficient time to people affected and their representative bodies to review the many hundreds of pages of plans and supporting documents and before the option to comment generally was effectively closed to us.

We were disappointed not to be able to easily submit a single electronic representation on all of the issues we wish to flag on the Masterplan. The choice given was to write to a Freepost address or work go through the portal page by page to find the relevant section to comment on and to tick various boxes along the way without knowing what the next question or section might ask. We do not consider that this is a helpful and accessible way to ensure that members of the public, community groups and representative bodies can meaningfully engage in the process. At the previous stage email submissions were allowed and the representation documents were published [Comments from the Draft Plan Consultation | Creating a Place for Life \(tcbgardencommunity.co.uk\)](https://tcbgardencommunity.co.uk)

Whether these issues and concerns would be sufficient for the Plan to be considered unsound or legally not compliant is a matter for the Inspector, but we will respond in the negative to these questions on the portal as there is not an option of 'don't know'.

DPD document- [Tendring Colchester Borders Garden Community - Tendring Colchester Borders Garden Community Development Plan Document \(DPD\) \(oc2.uk\)](https://oc2.uk)

Chapter 3: Land Uses and Spatial Approach

Impact on Crockleford We welcome the **Crockleford Heath Character Appraisal Plan** as it recognises the uniqueness of the area that it needs to be treated very carefully to avoid destroying it. The draft DPD begins to address this, and has included a larger than previously identified Crockleford Heath Special Character area for special treatment.

However, the problem which we think blows the Character Appraisal apart, is the density of housing being proposed. 30 dwellings per hectare (although much less than in the other hubs) is not conducive to creating a village feel to the development which is what seems to be proposed. For context, the settlement area of Ardleigh (i.e. the centre of the village and the main development North South and West of the crossroads) is a similar area to that being proposed to be developed around Crockleford. Ardleigh's settlement area has approximately 350 houses which equates to

under 12 dwellings per hectare. The Crockleford development hub would have at least 2.5 times more dwellings i.e. 1,000, perhaps even 1,500 with a density of 30 per hectare. This is much more than the most densely populated part of Ardleigh!

Chapter 4: Nature

Crockleford The DPD also recognises the wider environs and we support extending and protecting the Wildlife corridor along Salary Brook between Churn Wood and Walls Wood as well as a new corridor round the east side of Crockleford, up to the point where the A120 and Bromley Road meet. We would like to see more detail relating to these Green Corridors between the three communities and towards Colchester (Greenstead/ Longridge) and feel that these need to be defined within the DPD documents. At present the plan is too vague, and too much is left to the developer to decide.

We welcome the early development of the new Country Park and further steps to protect the area around Salary Brook. We would ask that the equivalent green space, permanently lost by the recent 145 dwellings off Bromley Road (within the original development area), should be compensated for by adding to the green spaces within the Country Park. Also, that further development, along Bromley Road should be firmly resisted. (current appeal for 14 homes with Planning Inspectorate [APP/P1560/W/22/3313107](https://www.planningportal.co.uk/applic/land-use/planning-applications/1560/w/22/3313107))

Serious consideration should be given to local food production for the Garden Community and the land in the area of Crockleford Heath should be retained for this purpose rather than lost to housing. The area has historically grown fruit and vegetables, as well as arable crops. Innovative and sustainable initiatives should be developed for local people to grow produce with low food mileage and with all the associated health benefits.

Chapter 8: Movement and Connections

Traffic impact and Bromley Road It appears that the only route that residents from the new Crockleford Hub, which straddles the Bromley Road, would be able to use to drive to Colchester would be along Bromley Road. Hence we remain very concerned about the impact on Bromley Road and the ongoing routes in to Colchester and/or through Ardleigh to join the A137.

We are also concerned about the short to medium term impact on traffic through Crockleford of any delay to the A120/A133 link road and to the rapid transport system. The DPD appears to be silent on the memorandum of understanding reported to the Joint Committee on 27 February due to the shortfall in funding for the Link Road, which we understood would delay the final stages of the link road until the first buildings were underway.

Our residents are also worried about construction traffic and noise of construction particularly for residents living on or using Bromley Road and the small lanes which connect to it. The experience of the recent development (145 houses)-at the Salary Brook end of Bromley Road has been that this has been very disruptive indeed to residents. Any closures to parts of Clingoe Hill, or added congestion there, will inevitably lead to the lanes through Crockleford being used as rat runs (more than is already the case- confirmed as a current practice in the Wivenhoe Society submission).

We welcome the extension of the Rapid Transport System (RTS) in to the new Crockleford development as this will improve connections by public transport to the other hubs and to Colchester. We do not think there has been adequate modelling though and are sceptical as to whether the links to Colchester will be the ones most needed/ used. For example in our Neighbourhood Plan consultation Ardleigh residents highlighted links to Ipswich, Manningtree and

countryside and coast and to the A12 and A137 as well as proximity to Colchester as key benefits/strengths of our Parish.

To avoid further traffic congestion on Bromley Road and the routes from it, we broadly welcome North and South settlements not being able to drive to the Bromley Road, however, Crockleford hub residents will not be able to access the Link Road.

We are not convinced that changes to patterns of car use will happen quickly enough to avoid serious problems with congestion and road safety on the existing road network and the proposals seem to be based more on hope than evidence-based expectation. See also sustainability appraisal below.

Chapter 10: Infrastructure Delivery, Impact Mitigation and Monitoring

Expanded development area A triangular area around Jubilee Lane to the northwest of the maps was added in to the development area at the final stage. There are houses and businesses in this area which had hitherto been unaware that they may form part of the Garden Community. We asked in February for these residents to be directly notified, we have not seen any evidence that they have been.

Chapter 7: Community and Social Infrastructure

Stewardship principles, governance and democracy It seems clear that the 'jurisdiction' and boundaries of the existing Parishes will need to change once the developments come to fruition.

We have asked in meetings and consultation events for details of what might be envisioned as far as governance and management of amenities and local democracy is concerned. We would welcome a firm commitment to actively involving the existing Parish Councils (who after all represent the residents already living in the area) at all stages of discussion about stewardship options and to an appropriate element of democratic/public ownership and management of amenities and assets. Some Crockleford residents have told us that they want to stay in Ardleigh, so, for example, it shouldn't be assumed that an entirely separate governance arrangement for this new hub is the only option.

Sustainability Appraisal [Tendring Colchester Borders Garden Community - Tendring Colchester Borders Garden Community Sustainability Appraisal \(oc2.uk\)](#)

The broad location in fig 1.1 does not match the final DPD as it doesn't include the area around Jubilee Lane in Crockleford.

The Sustainability Appraisal does not adequately appraise the impact on congestion on the existing road network, in particular Clingoe Hill and Bromley Road. The criteria on congestion focus on sustainable transport mitigation measures but do not address the question of whether these will offset the impact of the development to an acceptable level. The implications of a phased delivery of the A133/A120 link road need to be reviewed in this context.

*Ardleigh Parish Council
Submitted online 25/6/23*