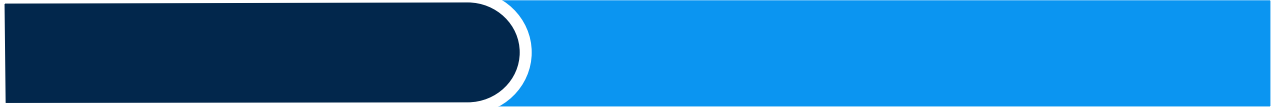


TENDRING COLCHESTER BORDERS GARDEN COMMUNITY



REGULATION 19 SUBMISSION DRAFT RESPONSE BY THE UNIVERSITY OF ESSEX

June 2023

1. EXECUTIVE SUMMARY

- 1.1 Whilst the University of Essex (UoE) recognises positives within the draft DPD, it is of the view that it is unsound, as it will not deliver a number of the objectives set out in Policies SP8 and SP9 of the Colchester City Local Plan 2013-33, North Essex Authority's Shared Strategic Section 1 Plan, under which it is being produced. More particularly, the draft DPD fails to:
- Make proper provision for the expansion of the University of Essex (Policy SP9 Requirement F25); and
 - Make appropriate provision for employment land linked to the Knowledge Gateway (Policy SP9 Requirement C5).
- 1.2 The draft DPD does not adequately capitalise upon the benefits that continued University and knowledge-based employment growth (such as high quality, secure, jobs; attracting research and technology-intensive business to the region; the contribution that student spend makes to the local economy; and helping retain and grow graduate employment and skills in North East Essex) could make to the success of the Garden Community, Tendring District and Colchester City.
- 1.3 Policies GC1: Land Uses and Spatial Approach and GC4: Meeting Housing Needs, together with the related University and Knowledge Gateway expansion proposals, as they are shown on the Proposals Map, need to be amended for the draft DPD to be found sound.

2. FORMAT

- 2.1 The University's concerns primarily relate to the spatial strategy and land use planning matters as they are set out in GC Policy 1: Land Uses and Spatial Approach. Accordingly, UoE's representations mainly address this policy. Reference is made to other policies (which relate to development control matters), where they are relevant to these issues.
- 2.2 The University made representations to the Regulation 18 draft and, at the request of the Council, it provided further clarifications on 2nd August 2022.
- 2.4 The Regulation 18 representations, together with the August 2022 Clarifications, set out the University's position and should be read in conjunction with these Regulation 19 representations.

3. UNIVERSITY OF ESSEX (UoE)

- 3.1 The University Campus and Knowledge Gateway Research & Technology Park lie on the east side of Colchester, immediately to the south of the proposed Garden Community. The Masterplan Baseline Report September 2021 acknowledges that the University and the Knowledge Gateway can be a major catalyst and key driver of employment growth within and around the new Garden Community. The presence of the University and the Knowledge Gateway was one of the principal reasons why this location was chosen and subsequently found to be deliverable and sound by the Inspector who examined the Shared Strategic Section 1 Plan (two other garden community proposals were not taken forward, as the Examination Inspector concluded that they were not deliverable).
- 3.2 The University contributes just under £600m annually (2020/21) to the economy of the East of England and creates 6,451 (direct and indirect) jobs. If it achieves its growth objectives, this is predicted to rise to £1bn, and 9,644 jobs, by 2035. If the Garden Community proposals do not take full advantage of the presence of the University and the Knowledge Gateway, which are right on its doorstep, Tendring's, Colchester's and the University's ambitions will not be fully realised, and the full extent of these benefits will be lost.
- 3.3 The University currently comprises just over 17,000 students, but with developments that are already in the pipeline (such as the Pastures student accommodation), student numbers

will increase to 20,000 by 2025. It has aspirations to grow to 25,000 by 2030 and reach a student population of circa 30,000 by 2035. At that point, the University will employ approximately 1,500 researchers / academics, which will place it in the Top 30 Universities in the UK for research power (as measured by the number of researchers). The Shared Strategic Section 1 Plan runs until 2033 and both it, and any development plan documents produced under it, should make full provision for the University's growth.

- 3.4 The University needs to reach this goal in order to create intellectual communities that are reference points in their disciplines and to access external funding to support its activities. In recent years, Government funding bodies have been concentrating research towards the top 20 to 30 research universities that combine high-quality research with a critical mass of researchers. It is mission-critical to the University to ensure that it is part of this group, as this will secure its long-term position as a research-intensive institution.
- 3.5 The University was conceived and planned as a Campus based institution in the early 1960's. Its main base of operations is at Wivenhoe Park, Colchester, although it has two smaller campuses at Southend and Loughton. Throughout its history, the University has been, and continues to grow, as a campus based institution. All of its main activities at Colchester (academic, admin, support, student residences and student services and leisure facilities) are on, or adjacent to, the Campus. The University does not have any satellite sites or operations in Colchester.
- 3.6 The concentration of activities on, and adjacent to, the Campus defines the character of the University and is essential to its communities and the provision of student services. The University is committed to its Campus ethos and culture and **WILL NOT** develop satellite facilities (such as student accommodation).

4. NEED FOR ADDITIONAL STUDENT ACCOMMODATION AND ASSOCIATED FACILITIES

- 4.1 In order to achieve its growth objectives, the University needs to provide the requisite level of academic, teaching and research buildings, student accommodation, and support and leisure and recreation facilities. Whilst it continues to optimise the efficient and effective use of existing Campus buildings, much of its future growth will require new facilities and additional expansion land. This is accepted by both Councils.
- 4.2 The Campus (as it is defined in the Local Plan Proposals Map) covers some 70 hectares, but much of it is constrained and not suitable for development.
 - The eastern section of the Campus is a protected park (Wivenhoe Park) and includes five listed buildings. Any significant new development in this area will not be allowed.
 - Based on a number of recent applications submitted to the City Council for the development of new buildings within the western part of the Campus (i.e., the new Sports Arena and Causeway Teaching Centre), the City Council also aims to preserve a buffer strip, of up to 150m in depth, adjacent to the Park in order to protect its setting.
 - The central and western parts of the Campus lie on the eastern slope of the Colne Valley. The land slopes steeply from east to west meaning that there are limited areas or relatively level land that can be developed.
 - Although not part of the protected Park, the western part of the Campus also comprises former parkland of Wivenhoe House, with many veteran trees being present. The tree cover, and the desire to respect and maintain this defining characteristic of the Campus, together with associated ecology interests, further constrains the development potential of the central and western parts of the Campus.
 - Development on the western part of the Campus is further constrained by the City Council's desire to protect landscape character and ensure that any new buildings are not seen above the existing tree line from the west bank of the Colne Valley.

- Land to the west of the Campus, which is owned by the University, lies within Flood Zones 2 and/or the Coastal Protection Belt.
- 4.3 As a result, the potential to develop significant new buildings within the Campus is primarily limited to: -
- DS1. Land to the east of the North Houses.
 - DS2. The North Campus Car Parks (with parking lost needing to be replaced with multi-deck car parking).
 - DS3. An area adjacent to the Northern Causeway, between the main library and Rayleigh Tower.
 - DS4. Land to the rear of Rayleigh Tower and the North Teaching Centre.
 - DS5. Land on either side of Valley Road between Square One and Boundary Road.
- 4.4 The University is of the view that the available land within the Campus (as identified above) is sufficient, if it can be brought forward for development, to provide for the majority of its need for additional academic buildings to 2035. There may also be scope to develop up to a maximum of 1,000 additional student bedrooms, but the majority of the additional student bed spaces, that the University needs, together with other ancillary facilities, will have to be developed as an extension to the Campus.
- 4.5 The Constraints & Opportunities Plan at Appendix 1 depicts the main planning constraints that impact the Campus and shows future development areas, the Knowledge Gateway and additional land owned by the University.

Student Accommodation

- 4.6 As is common practice in UK universities, the UoE guarantees to provide accommodation for priority students (first year students, vulnerable and disabled students and international students) on Campus. Returning students (all other students) are largely catered for in the private sector - converted family housing and private sector Purpose Built Student Accommodation (PBSAs). The development plan needs to plan and make provision for all categories of students; including both those who live on, and off, campus.

Students Prioritised for On-Campus Accommodation

- 4.7 One of the key selling points of the University of Essex, when attracting new students, is its campus based environment. Students in their first year of study require the security, safety, welfare and wellbeing support that is available on Campus in order to facilitate their transition away from living at their parental home to living within a university environment. On Campus, they have direct access to the University library, study spaces, cafes, shops, university health services, the student union, nightlife and a broad range of extra-curricular facilities and activities that are integral to the creation of their peer and friendship groups.
- 4.8 The concentration of accommodation and support services on the Campus is particularly important, as the University has one of the highest levels of international student intakes in England (the University is internationally recognised and students from circa 140 nationalities are studying at Colchester). International students not only have to deal with the transition into student life, but also into the culture of a new country.
- 4.9 The University also seeks to provide Campus accommodation for other priority groups, such as returning International Students and students with disabilities.

Returning Students

- 4.10 The majority of returning students, as is common throughout the UK, live off-campus in student houses (most commonly converted dwellings) and, more latterly, in private sector

purpose-built student accommodation (PBSA), which have no direct link, or association, with the University.

Overall Student Numbers

- 4.11 In order to be able to meet its growth objectives, the University has to provide additional Campus student accommodation so that it can offer a place to all students in their first year of study and other priority groups. Alongside this, private sector accommodation for returning students off-campus will also need to increase.
- 4.12 The Colchester Campus currently offers 6,017 bed spaces for priority students (inclusive of the new Pastures development which is due to open in September / October 2023). This is consistent with the long-term average ratio of 2.65:1 students to each University bed space.
- 4.13 A University student population of 25,000, by 2030, with the assumption that 23,166 students will be studying at Colchester, would lead to a requirement for the University to provide 8,742 bed spaces (at a ratio of 2.65:1) for priority student groups. With a stock of 6,017 bed spaces, an additional 2,725 bed spaces will need to be provided by 2030.
- 4.14 For the University to achieve its growth target of 30,000 students by 2035 (the local plan period goes up to 2033), which would result in approximately 27,800 students in Colchester, this would require the University to provide 10,941 bedspaces for priority students.
- 4.15 In addition to this, there will be a need for additional accommodation for returning students in the wider community (i.e., within the current urban areas and the new Garden Community), totalling up to 14,424 by 2030 and 17,309 by 2035. The above figures are summarised in the table below:

Year	Total Number of UoE Students	Total Number of Students at Colchester*	Campus Bedspaces for Priority Students	Additional Campus Bedspaces Required for Priority Students after 2025	Bedspaces Needed for Returning Students
Current	17,000	15,753			
2025	20,000	18,532	6,017		12,515
2030	25,000	23,166	8,742	2,725	14,424
2035	30,000	27,800	10,491	4,474	17,309

- 4.16 By 2030, the University anticipates that some 8,742 priority students (10,491 by 2035) will need to live on Campus. If the University cannot provide sufficient accommodation for priority student groups on Campus, its growth plans will be constrained, and it may need to explore opportunities at its other campuses.
- 4.17 The University anticipates that it could develop, subject to the constraints identified above, up to a maximum of 1,000 bed spaces within the existing Campus boundaries for priority student groups (although this is subject to a number of assumptions regarding the relaxation of the planning constraints identified in Section 4, which are yet to be tested).
- 4.18 This leaves a residual requirement to develop a minimum of 1,725 additional bed spaces for priority student groups by 2030, and 3,474 spaces by 2035, on an expanded Campus. Given

the densities recently achieved at the Pastures, which represents a very efficient use of land, (1,262 student bedrooms developed in five, six-storey, buildings on a 3.17ha site), there is a requirement for approximately 7.8 to 9.1 hectares of additional land to accommodate the University's need to provide additional accommodation for priority students by 2035. If future developments cannot be undertaken at the same density, the required land take will be larger.

Areas of Search

- 4.19 It will not be possible to meet the future requirement for priority student accommodation on the existing Campus, hence the need for land onto which the University can expand. The University will only consider developing new student accommodation as a seamless extension to the existing Campus and it is prepared to look at opportunities to the west (on its own land at the Hythe), to the south (across Boundary Road), which still remains its preferred option, and to the east (across Colchester Road). Any development must, however, form a natural extension to the Campus (as is the case with The Meadows, Copse, Pastures and Quays).
- 4.20 Land to the north of the A133 is disconnected from the University Campus. The A133 is a major barrier to movement and the University **WILL NOT** develop any facilities, including its own student accommodation, to the north of the A133. The suggestion (Draft DPD Policy GP1) that accommodation that is developed by the University should be located in accessible locations within the Southern Neighbourhood of the Garden Community is entirely inappropriate, and wholly unacceptable, to the University.
- 4.21 This location may, however, be appropriate for private sector providers developing student accommodation for returning students.

5. SPORTS AND LEISURE FACILITIES

- 5.1 Throughout the consultation process, the University has articulated a growing need for access to additional sports facilities to support the growth of the University community.
- 5.2 The current sports facilities are operating at capacity at peak times and are already stretched to meet existing demand. The University has quantified and articulated its need for access to additional facilities in the Regulation 18 Representations and further Clarifications.
- 5.3 The University recognises the benefit of the allocated Sports and Leisure Park. Its proximity to the Campus will maximise accessibility for the University Community and the University will play its part, in liaison with the Councils and other stakeholders, to attract third party providers and operators to bring forward this development.

6. KNOWLEDGE GATEWAY

- 6.1 The Knowledge Gateway comprises some 12 hectares of developable land and is designated as a strategic employment site in the adopted Local Plan. With the imminent completion of Parkside 3A, approximately half of the Knowledge Gateway will have been developed.
- 6.2 The Knowledge Gateway is a wholly owned subsidiary company of the University. Whilst the University does not intend to purchase, or directly develop, additional land, it is supportive of the objective of allocating employment land, contiguous with the Knowledge Gateway, in order to create a critical mass of research, development and knowledge based employment activity that becomes the location of choice for this type of business.
- 6.3 It is, however, concerned that the draft DPD allocation, both in terms of the amount of land and where it is located, will fail to achieve the full potential that such a proposition could make to the local economy and employment opportunities in Colchester, Tendring and the Garden Community.

- 6.4 The representations that the University made to the Regulation 18 Draft Plan, together with the subsequent Clarifications, set out the reasons why it considers that the employment land allocated to the north of the A133, linked to the Knowledge Gateway, should comprise at least 12 hectares. The University maintains the view that a smaller allocation will not unlock the full potential of business and employment activity in this location.
- 6.5 To ensure a strong connection between the new employment land and the Knowledge Gateway, and to capitalise on the investment already made in the Knowledge Gateway, it is critical that there is seamless physical connectivity (e.g., a foot and cycle bridge) across the A133.
- 6.6 The University is also concerned that the allocation takes the form of ribbon development along the northern side of the A133. At over 1.3 kilometres long (east to west), and less than 100m deep (north to south), it will have no centre or identity and limited connectivity. In this form, it will be very difficult to create the all-important linkages between companies, with the existing Knowledge Gateway and with the research and enterprise activities of the University. It is unlikely that support services, such as business incubator units, small shops and cafés, which are integral to creating an active business community, could be successfully established. The allocation, in its present form, will not achieve the desired goals.

7. NORTH ESSEX AUTHORITIES' SHARED STRATEGIC SECTION 1 PLAN

- 7.1 Policy SA EC7 University of Essex Expansion of the Local Development Framework Site Allocations document, which was adopted by the Colchester Council in October 2010, identified land, to the south of Boundary Road, for university expansion (see extract attached at Appendix 2 from the Wivenhoe Neighbourhood Plan). Policy SA EC7 reads:

“Permission will be granted for academic expansion within the area denoted by University Purposes on the Proposals Map provided that it relates satisfactorily to its setting on the edge of the built up area of Colchester. Proposals within the existing campus will be acceptable providing they have full regard to the landscape setting and nature conservation interests. All proposals for development will need to include the following information.

- *A Flood Risk Assessment; it should satisfy the Sequential Test and the Exceptions Test of PPS25 and provide open space to the river frontage.*
- *A comprehensive landscaping scheme.*
- *A biodiversity enhancement plan.”*

- 7.2 The early iterations of the current Shared Strategic Section 1 Plan proposed to remove this allocation. The University objected and subsequently agreed a Memorandum of Understanding with Colchester & Tendring Councils, which addressed its concerns. A copy of the Memorandum is attached at Appendix 3. The University agreed not to pursue its objection to the Examination, with Colchester and Tendring committing to allocating an area of comparable size, and in a suitable location, as part of the Garden Community, for university expansion.
- 7.3 A copy of the Memorandum of Understanding is also available to view on Colchester City Council’s website.
<https://www.colchester.gov.uk/local-plan/statements-of-common-ground/>
- 7.4 The Report on the Examination into the Shared Strategic Section 1 Plan records (paragraph 101) as follows:

'In paragraph 263 of IED/022 (attached below), which forms an integral part of this report, I identify access to employment opportunities at the adjacent University of Essex and its associated Knowledge Gateway as one of the factors contributing to the ability of the GC to deliver sustainable development. Moreover, national policy encourages LPAs to plan positively for the expansion of knowledge-based business and employment. But while provision for expansion is made in the adopted Colchester Site Allocations DPD, it is not reflected in the Plan. MM40, based on the Statement of Common Ground between the NEAs and the University, is therefore required to rectify the submission and ensure the Plan makes the necessary provision'.

- 7.5 The Inspector who reported on the Examination into the Shared Strategic Section 1 Plan found that, in order to be sound, it needed to make proper and full provision for the expansion of the University, which was at least equivalent in size to the allocation made in the previous Site Allocations document.
- 7.6 Accordingly, Part 1 Policy SP9 Tendring/Colchester Borders Garden Community (Requirement F25) requires that the subsequent Garden Community DPD should include an:-
- 'Allocation of additional land within the garden community, to accommodate University expansion which is at least equivalent in size to the allocation in the Colchester Local Development Framework Site Allocations document October 2010'.*
- 7.7 The draft DPD fails to meet this requirement. It is, therefore, not compliant with Part 1 Policy SP9 (which is one of two policies under which the DPD is being brought forward – the other being Policy SP8) and it is, therefore, unsound.
- 7.8 Policy SP9 also provides that the Garden Community DPD should (Requirement C5): -
- Make provision for a wide range of jobs, skills and training opportunities. The DPD will allocate about 25 hectares of B use employment land within the garden community. This may include provision of office, research and development, light industrial and/or other employment-generating uses towards the south of the site in proximity to the existing University of Essex and Knowledge Gateway and provision for office, research and development, industrial, storage and distribution uses towards the north of the site close to the A120.*
- 7.9 The representations that the University made to the Regulation 18 Draft Plan, together with further Clarifications, set out the reasons why it considers that the employment land allocated to the north of the A133, as employment activity linked to the Knowledge Gateway, should comprise at least 12 hectares of the overall 25 hectares. The University maintains the view that a smaller allocation will not unlock the full potential of business and employment activity in this location.

8. COLCHESTER BOROUGH LOCAL PLAN SECTION 2

- 8.1 Colchester Borough Local Plan Section Two Policy EC1 Knowledge Gateway and the University of Essex Strategic Economic Area, recognises the value of the University of Essex to Colchester's economy and the contribution that it makes to the vitality of the City Centre. It commits the Council to working in partnership with the University to maximise the economic and social benefits associated with the University's presence. It fully supports the expansion of both the University and the Knowledge Gateway and confirms that, *'there will be a need for a comprehensive approach to development in conjunction with the Tendring Colchester Borders Garden Community proposed to the east of Colchester, working in partnership with key stakeholders, including the University'.*

- 8.2 The supporting text to the policy recognises, and supports, the University's growth to 20,000 students by 2025, and 25,000 students (it is the University's aspiration to grow to about 30,000 students) by the end of the Local Plan period (paragraph 6.70). Paragraph 6.75 reads as follows: -

'The significant growth envisaged by the University and the associated expansion opportunities for the Knowledge Gateway Technology Park will be released over the long term with phases being developed through the Plan period and potentially beyond associated with the new Garden Community. This would provide a framework for the expansion of both the University and the Knowledge Gateway and also provide the opportunity to maximise any benefits associated with the Garden Community. A joined-up approach and mutual opportunities for both are evident, particularly associated with infrastructure improvements with alternative public transport options being a key factor for East Colchester'.

- 8.3 As explained above, the draft DPD fails to maximise the benefits that could be realised from the continued growth of the University and activities linked to the Knowledge Gateway. It is inconsistent with Colchester Borough Local Plan Section 2 Policy EC1 and is unsound.

9. WIVENHOE NEIGHBOURHOOD PLAN

- 9.1 The Wivenhoe Neighbourhood Plan 2019-2023 recognises the importance of the University to the cultural and economic life of the parish. Paragraph 9.17 reads as follows: -

'Whilst the development of the Campus is constrained by a number of environmental and heritage issues, the University is of the view that it should be able to accommodate its growth needs, up to 2024/2025, within its existing land ownership. However, beyond that date, it is likely that it will need to expand beyond its current boundaries. Discussions with the University have revealed that it is willing to forego the expansion allocation, as set out in the adopted Colchester Local Plan 2001-2021, provided that an appropriate, replacement, allocation is made. Therefore, in agreement with the University and Colchester Borough Council, the Town Council supports the removal of this designation from the adopted Colchester Borough Local Plan 2001-2021 and the identification of a replacement location in the emerging Local Plan or any Subsequent Strategic Growth DPD relating to the proposed Tendring Colchester Borders Garden Community (see paragraph 13.12). The current University expansion designation is referenced in the adopted Core Strategy as a proposed development in the East Colchester Growth Area and specifically in the Site Allocations DPD under Policy EC7. Following the removal of this proposed expansion site, the land should revert to protection from inappropriate development in accordance with Policies WIV3 and WIV4 of the Wivenhoe Neighbourhood Plan relating to settlement separation and landscape impact, respectively'.

- 9.2 Section 13 of the Neighbourhood Plan specifically refers to the University of Essex and recognises (paragraph 13.9) that it is a *'valued and very important asset for Wivenhoe. This Plan supports its growth'*.

- 9.3 Paragraph 13.12 recognises that, in order to continue to grow beyond 2024/2025, the University will need to expand beyond its existing Campus. The paragraph goes on to state that: -

'A new allocation for University expansion is likely to be identified as part of the new garden community or as a direct land allocation in the emerging Colchester and/or Tendring Local Plans. The Town Council will work with the University and Colchester and Tendring Councils to agree an approach the University's long-term expansion'.

9.4 The Neighbourhood Plan expresses a preference for the expansion land to be located on the north side of the A133 – which is unacceptable to the University.

10. TENDRING LOCAL PLAN 2013-2033 AND BEYOND SECTION 2.

10.1 The Tendring Local Plan Section 2 makes only limited direct reference to the University. Its vision for the Garden Community does, however, provide that: -

‘The University of Essex will be one of the leading research and development facilities in the country and, as a result, businesses will have moved to the area to benefit from its expertise and improved transport links. The new garden suburb crossing the Colchester Borough and Tendring District Boundary will be a much sought-after place to live’.

10.2 Paragraph 6.5.10 recognises that the closeness of West Tendring to the University of Essex gives it a competitive advantage and opportunity to deliver medium to long-term employment opportunities.

10.3 Policy PP12 Improving Education Skills commits the Council to working with its partners, including the University of Essex, to deliver new and improved educational facilities, including higher education. The policy commits the Council to supporting the provision of new education facilities, including *‘the expansion of the University as part of the Garden Community Development’*.

11. IS POLICY GC1: LAND USES AND SPATIAL APPROACH SOUND?

11.1 For the reasons outlined in these representations, together with the representations submitted to the Regulation 18 draft and the further Clarifications, the University of Essex considers that Policy GC1 is not sound. Those parts of the policy that relate to the University and the Knowledge Gateway have not been positively prepared; they are not justified; they will not be effective; and they are not consistent with national policy or the Council’s adopted policies. They do not make full provision for the University’s growth requirements or the benefits that could be realised from expanding the Knowledge Gateway.

University Expansion

11.2 The Inspector who held the Examination into Shared Strategic Section 1 Plan directed that, in order for it to be found sound, it had to be modified so that Policy SP9 made full provision for the planned expansion of the University of Essex, up to the end of the Plan period, by allocating land for University expansion which is at least equal in size to that set out in the previous Local Plan.

11.3 The draft DPD is being prepared under the authority of, and in accordance with, Section 1 Policies SP8 and SP9 and should deliver the objectives and requirements set out therein. In failing to do so, the Plan has not been positively prepared, it is not consistent with national and local policy and it will not be effective (in that it will not allow the University to achieve its intended growth plans, which are fully supported by both Councils) and it will not maximise the cultural, job and economic benefits, for both the Garden Community and the wider Colchester and Tendring areas, that such growth could deliver. Furthermore, the draft DPD (and the supporting evidence base) does not provide sufficient justification as to why the Councils are now taking a different approach to the growth of the University than is set out in the Shared Strategic Section 1 Plan.

Student Accommodation

11.4 The University **WILL NOT** develop accommodation, for priority student groups, to the north of the A133. Accordingly, and in order to continue to grow beyond 2025, it will have to:

- look to develop at a greater density within the central and western parts of the Campus, which may require a relaxation of one, or more, of the planning constraints identified at Section 4 of this statement and which could impact the parkland landscape of this part the Campus; and/or
 - consider options to provide further accommodation on the Knowledge Gateway (resulting in a loss or employment land; and/or
 - continue to progress expansion proposals to the east of the B1028 Colchester Road, regardless of the policies set out in the adopted DPD; and/or
 - further explore the option of expanding to the south of Boundary Road; and/or
 - further consider options to develop to the west of the Campus, which is also subject to a number of planning constraints (see Section 4); and/or
 - look to deliver a greater proportion of its growth needs at the Southend and Loughton Campuses.
- 11.5 The University's growth plans will result in there being an additional 7,413 students in Colchester by 2030, and 12,047 by 2035 (as per the table at paragraph 4.15), all of whom will require a place to live. If, as is currently implied in draft Policy GC1, this scale of accommodation was to be provided in the Garden Community, it would significantly change the intended character of, and potentially overwhelm, the new garden communities (which are only intended to provide 7,500 dwellings).
- 11.6 A balance has to be struck between the needs of the University and those of the new garden communities, which can only be achieved by allocating sufficient land for the University to meet the need to provide accommodation for priority students as a logical and seamless extension to the Campus.

Sports & Leisure Facilities

- 11.7 Sports & Leisure facilities are required to support a growing University and the wider community through the Garden Community development. The current University sports facilities are operating at capacity at peak times and are stretched to meet existing demand.
- 11.8 The University recognises the benefit of a Sports and Leisure Park being developed in close proximity to the Campus in order to maximise accessibility for the University Community. The University would be a major user of these facilities and would play its part, in liaison with the Councils and other stakeholders, to attract third party providers and operators to bring forward this development.

Knowledge Gateway

- 11.9 As is also identified in the Regulation 18 Representations and further Clarifications, if it is to fully capitalise on the potential benefits arising from employment land linked to the Knowledge Gateway, the DPD should allocate a minimum of 12 hectares of land for additional employment growth. The spatial orientation of the allocation should also be changed, on the Proposals Map, in order to allow the creation of better links between the new employment land and the existing Knowledge Gateway and the University. Without these changes, the policy will not be effective and will not deliver the Councils' full aspirations and objectives.
- 11.10 In order to ensure that a strong connection is created between the new employment land and Knowledge Gateway, it is critical that investment is made in seamless physical connectivity (e.g., a foot and cycle bridge) and that close partnership working is established to capitalise on the investment already made in the Knowledge Gateway and the ongoing development of business, research and knowledge based employment in this locality.

Changes to Policy

- 11.12 The University considers that the following changes are required in order for Policy GC1 to be considered sound (changes are in red).

Part F: Sports and Leisure Park and University of Essex Expansion

An appropriate allocation of *developable land and north of the proposed 'Wivenhoe Strategic Green Gap'*, is allocated on the 'Policies Map' for University Expansion and a new 'Sports and Leisure Park', of *which the sports and leisure facilities would* ~~This will facilitate the enhancement of sports facilities required by the University of Essex as part of its plans for long term expansion and will provide sports and leisure facilities which will~~ be available for use by residents and clubs in the existing community and the proposed Garden Community ~~and the University~~.

In addition to the developable area, the allocation will also include ~~The 'Sports and Leisure Park' will comprise of~~ a strong landscaped edge to the south, adjacent to the 'Wivenhoe Strategic Green Gap', protecting the character of the surrounding landscape and ~~to~~ creating new habitats for a range of biodiversity. It will connect to the wider network of multifunctional green and blue infrastructure and will provide walking/cycling routes serving the Garden Community and its Neighbourhoods'.

Part G: Knowledge-Based Employment Land

Approximately ~~8~~ 12 hectares of land north of the A133, opposite the *Knowledge Gateway Gateway Wivenhoe Park and the University of Essex*, is allocated on the 'Policies Map' for knowledge-based employment purposes to maximise the benefits arising from close proximity to the University of Essex and the *existing developing* Knowledge Gateway. This would be attractive to securing business investment whilst encouraging the provision of sustainable travel trips via walking and cycling routes either directly across the A133, or via the 'Salary Brook Country Park'. Development will be designed and landscaped to make an efficient use of the land available and to ensure an appropriate transition between built development and the open countryside – particularly towards the 'Salary Brook Country Park'.

- 11.13 The changes to the policy should include redrafting of the Proposal Map to show:

- Land for university expansion, that is at least equivalent in size to the allocation in the Colchester Local Development Framework Site Allocations document October 2010', on the south side of the A133.
- Land for a Sports and Leisure Park, of a size that will meet the needs of the University and the existing and new garden communities.
- The allocation of 12ha of employment land on the north side of the A133 opposite, and contiguous with, the Knowledge Gateway.

12. IS POLICY GC4: MEETING HOUSING NEEDS SOUND?

- 12.1 Part H of the policy provides that all forms of student accommodation, needed to allow the University to meet its expansion proposals, should be encouraged in accessible locations within the South Neighbourhoods, where it would have good sustainable links to the University. It also indicates that the size and specification of any student accommodation will be determined through the Housing Strategy, as informed by evidence held by the Councils in partnership with the University of Essex.
- 12.2 The Councils are not in the best position to determine either the number, or location, of additional student bedrooms required in order to facilitate the University's growth.

- 12.3 As has been described, the University is a Campus based institution. Adopting the strategy set out in the draft DPD would significantly alter its character, ethos and culture in a manner which is unacceptable to the University. It **WILL NOT** develop its own accommodation (i.e., accommodation for priority students) north of the A133 in the South Neighbourhoods. Private sector student accommodation, aimed at returning students, may be acceptable in this location.
- 12.4 The policy is also flawed in that developing the majority of student housing in the South Neighbourhoods would overwhelm the communities living there.

Changes to Policy

- 12.5 In order to be positively prepared, justified, effective and consistent with the Councils' own strategic policies, Part H of the policy needs to be amended as follows (changes in red).

Part H: Student Accommodation

The University of Essex has long term plans to expand student numbers and to extend its accommodation provision. Accommodation for students in their first year of study and other priority groups will be provided on land identified for University Expansion within the Proposals Map. Other student accommodation will be encouraged in accessible locations within the 'South Neighbourhood' where it would have good sustainable links to the University of Essex and where it will contribute to a mixed and diverse community. The size and specification of any student accommodation outside of the expanded Campus will be determined through the Housing Strategy (see Part B) and will be informed by evidence held by the Councils in partnership with the University of Essex.

13. APPENDICIES

1. Constraints & Opportunities Plan.
2. Extract from the Wivenhoe Neighbourhood Plan.
3. Memorandum of Understanding.