Wivenhoe Town Council
Matter One Hearing 9th May 2018.
Additional Comments.

EXD/013/A-K: AECOM Social Infrastructure Framework Model: Briefing Notes and Spreadsheets
EXD/014: North Essex Rapid Transit Study: Infrastructure cost assumptions
EXD/015: Cushman & Wakefield Report: North Essex Garden Communities Valuation Advice
EXD/018: ATLAS North Hertfordshire New Settlement Study*

Thank you for the invite to comment further on Matter One via the documents submitted.

We have offered as comments under the following subject headings for convenience.

**Strategic**

The concentration of 42,000 units across just three sites is a fundamental flaw of the combined NEGC Local Plan. The demands on infrastructure are too burdensome for each of the three chosen sites. Factor in the low level of contingency funding, the high-risk approach adopted by the NEGC on land purchase, the chameleonic delivery model and the potential for further legal proceedings and it clear that the ‘plan’ is unsound.

Wivenhoe Town Council has no reason to comment on the inclusion or otherwise of the Pattiswick site in all aspects but one. The OAN for Colchester and Tendring is already too high. If the Pattiswick site is to be included then great care must be taken to equalise the effects across existing local communities rather than adding to the overall OAN for the strategic area and exacerbating infrastructure concerns.

We also note that the concept of Garden Communities has been removed from the current iteration of the Draft NPPF. This is a salient point as the East Colchester Garden Community fails to realise basic principles of a Garden Community. It is not discreet, it does not have the acceptance of local communities, it relies on existing infrastructure that is currently overburdened. It does not represent land capture value as the land purchase has not been finalised and will not be until the local plan is approved thus increasing its value. None of the homes as highlighted in the Cushman & Wakefield report are affordable on local wages of approx. £24,000 per annum for Tendring and £26,500 per annum for Colchester. There is insufficient land
for employment and there are scant retail units (for walking to shopping in vibrant, sociable neighbourhoods https://www.tcpa.org.uk/garden-city-principles).

The NPPF has been reviewed in the following document - Town and Country Planning Association – ‘Summary – A vision for England’. A briefing from the TCPA on the draft NPPF. This raises some concerns, notably for local communities who feel powerless on the outside of planning policy decisions.

https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=f04d6421-110f-4a50-bc02-930988874396

s4.14 “people will lose the right to be involved in what matters to them”.

s3.4 the TCPA wish to strengthen community involvement by stating “Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving the long-term sustainable development of their locality. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development” Whilst we opine that the NEA’s have spectacularly failed to engage local communities we wish to draw attention to alignment between TCPA guidance and the mutually exclusive desire of existing communities to retain their Green belt. This potentially reduces land value to allow for CPO of Green Belt to prevent coalescence. Demarcation of Green Belt is currently missing from the NEA ‘plan’ and its addition would be welcome in the context of the pursuance of the CPO model of delivery.

We still see no evidence that fundamental risks such as the delivery model, lack of statutory instruments and delays caused by legal actions should this plan be approved in its current format have been addressed.

We support the CAUSE submission on this Matter. We remain committed to strategic community led involvement across the NEA and would welcome the opportunity for local stakeholders to have an equal number of votes on the NEGC. We echo the call for ‘small is beautiful’ as the lowest risk approach to creating high quality communities and are a signatory of the www.abetterway.today

We believe that this plan, at the Strategic Level, is unsound.

**Transport**

These figures are nothing but guess work and cannot be relied on to inform the project in any credible way. The major part of the route out of the East Colchester site into Colchester central (and/or beyond) is yet to be decided. This is including the presumption that the university will allow additional traffic down Boundary Road, which in their consultation statement they say they will not agree to. To ignore all the physical restrictions that have to be overcome is at best amateur.
We wish to draw your attention to our comments in our Transport submission for Matter 2 describing how the envisaged road and rail network in this region are not capable of the increased demand of commuters buying these ‘London’ priced homes.

With regard to the statement by A Lindsay, Transport Officer at ECC we have the following comments.

The table below shows the lengths per section (km); the proportion of each section that is urban and inter-urban; and the costs per section for the three options of BRT, GBRT and LRT (£m in 2010 prices.)

<table>
<thead>
<tr>
<th>Description</th>
<th>Distance (km)</th>
<th>% Urban</th>
<th>% Inter-urban</th>
<th>Option 1 BRT cost (£m)</th>
<th>Option 2 GBRT cost (£m)</th>
<th>Option 1 LRT cost (£m)</th>
</tr>
</thead>
<tbody>
<tr>
<td>TC GC to Hythe</td>
<td>4.2</td>
<td>100%</td>
<td>0%</td>
<td>8.37</td>
<td>31.38</td>
<td>62.76</td>
</tr>
</tbody>
</table>

This table refers to the Garden Community to Hythe as ‘Urban’. If it was a ‘discreet place’ this would be an inter-urban journey. The costs are based on 2010 figures for works that may not commence until 2027. This is somewhat worrying, as is the estimate of £210million for the Tram system. However the main focus of interest for this document should be that it does not contain a contingency and has not been the subject of independent professional scrutiny.

### Viability

The Wivenhoe Neighbourhood Plan states that the land between the University and the area south of Brightlingsea Road should be protected from development. This planning conflict must be addressed or there was very little point in the 5 years of Community led work that went into the WNP. There must be no coalescence with Colchester via the Garden Community extension.

Cushman and Wakeman make assumptions that are fundamentally flawed. The more of the thousands of units that get delivered the lower the cost of each unit will become. Local knowledge of the sites chosen as examples highlights that they are high end housing in prime locations and not within the resource base of those on local wages.

In additional there will be none of the uplift for Garden Communities as wishfully indicated by AECOM as the public realm infrastructure will not be in place. This is evidenced elsewhere with notable concerns over the rapid transport system, secondary school provision (the LA only promised places within North Essex, not new buildings) and NHS provision (only a ‘spoke’ of a central ‘hub’ and no current guarantee that a place based medical centre will be provided).

[File](file:///C:/Users/Asa/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/N2PSGHEX/EXD.013B_East_Colchester_SIF_Cost_Spreadsheet.pdf) We note that the AECOM benchmark for Education is based on small dwellings (2 bed) yet the
sales figures and thus financial model are based on much larger dwelling, which would invariably suggest at a higher number of pupils. In addition, the North Hertfordshire study is predetermined on a figure of 4,175 units for a Secondary School facility of 11 hectares. An equivalent educational offer in land terms is missing from the NEA approach. We believe that education provision must be strategically addressed with physical sites and not places at schools outside of the community’s footprint if place making aspirations are to be realised.

We believe that Wivenhoe Town Council should be granted a position from which to speak on the day. Matter One relates to the strategic viability of the NE Essex GC’s and its effect on Wivenhoe.