

# **Ardleigh Parish Council response to Regulation 16 Consultation Draft Plan for the Tendring Colchester Borders Garden Community**

## **1. General concerns- consultation process and information available**

- 1.1. We have done our best to address the full comments in this one document but are concerned that we have not been able to thoroughly review all the policies and questions posed in the consultation and supporting documents in the time available. There also appears to be significant overlap between policies and questions raised (eg density is within *Buildings, Places and Character* and *Requirements for all new developments*.)
- 1.2. We are concerned that the process of feeding back comments through 'Your Views Matter' is likely to prevent/put off the majority of people from commenting. Our Councillors have found the process difficult and time consuming – and do not consider it to be democratic. The process is far too complex even for those with the time and knowledge to be able to fully comment. Was this process tested on members of the community and any equality impact considered before issuing the documents and setting the deadlines?
- 1.3. In addition, the Parish Council was disappointed with the poor quality of exhibition material available at the open days; especially that only high-level maps were displayed with very little detail- unless specifically requested.
- 1.4. It is clearly essential that the overall effort to consult should not just be a 'tick box' exercise but a meaningful and thorough means to gather the community's opinion.

## **2. Summary**

- 2.1. On balance, the Parish Council's view is that the location of the proposed North Settlement within Crockleford Heath is not compatible with many of the proposed Garden Community policies and principles and that the negative impacts would far outweigh any public benefit. The North Community should not, therefore, be developed
- 2.2. Our key concerns are summarised below.
  - Lack of protection of the whole area of Crockleford Heath, both sides of Bromley Road, with its unique landscape characteristics, including: ancient woodland, priority habitats and ancient and pre-modern agricultural land, much of which is classified as excellent quality.
  - Loss of Landscape/ impact on wildlife and nature.
  - Traffic and transport concerns- including road links of the new development on to Bromley Road.
  - Lack of Infrastructure (especially doctors, pressure on Ardleigh services)
  - Insufficient consideration of existing communities.
  - Lack of recognition of the impact of developments already underway (eg dwellings along and off Bromley Road).
  - Density of the housing proposed (especially in Crockleford Heath)

In general, we agree with the objections from the Crockleford and Elmstead Action Group, representing residents who live within the development area including parts of the parish of Ardleigh. The CEAG statement is attached as appendix 2.

## **3. Protection of Crockleford Heath including landscape and nature**

- 3.1. The Landscape assessment attached as appendix 1 gives reasons why Crockleford Heath is an unsuitable location for housing development.
- 3.2. At present within the draft plan, a very small part of Crockleford Heath is designated as an Area of Special Character. We would argue that this should be for the whole of Crockleford

Health. There is no discernible difference in character between the areas chosen and the wider area of 'Crockleford Heath' comprising Bromley Road, Spring Valley Lane, Chapel Lane, Green Lane, Jubilee Lane and Wivenhoe Road.

- 3.3. Ancient and pre-modern agricultural land should be protected.
- 3.4. The land already lost to the Bellway development should be replaced with an extension of the Strategic Green gap to envelop Crockleford Heath to prevent it being surrounded by development and to retain its special rural character. The land north of Bromley Road should be retained as agricultural land or extended country park to the area extending the proposed country park around Churn Wood and Crockleford Heath.
- 3.5. Development should not be allowed to encroach on ancient and other woodland. Light pollution should be kept to an absolute minimum.

*Links to policies* Land Use and Spatial Approach,

#### **4. Housing Density**

- 4.1. Housing Density - with particular regard to the most sensitive area between North and Central communities and Crockleford Heath Area of Special Character. It is stated that housing should be provided with a broad range of 30pdh in the most sensitive areas. The area encircled by the proposed RTS, as well as the surrounding land around Crockleford Heath, both sides of the Bromley Road, would most likely fall into this designation. The Essex Design Code description of Arcadia would seem most appropriate for this very sensitive area which advises up to 8 houses per hectare. "As Arcadian layouts are dependent for their affect on a dominant landscape, the most suitable sites will be those which already have a significant density of mature trees and hedges." The Essex Design Code suggests that criteria for placing buildings at densities over 20dpg continuity of building frontage is desirable because it helps to enclose spaces and creates continuous pedestrian routes. If this type of design were adopted for the areas mentioned above they would be entirely out of keeping with the areas of special character around Crockleford Heath and the rural idyll of Crockleford Heath and surrounding area would be lost forever.
- 4.2. Housing should blend with the surrounding countryside and be built of net carbon materials and have net carbon heat source. They should provide opportunity for swift and bat nesting/roosting places, as well as habitat for hedgehogs
- 4.3. It should also be noted that the area west of Spring Valley Lane and Wivenhoe Road stretching to the other side of Salary Brook is currently designated as a "Network Enhancement Zone 2". This means that it is ideal land to be protected and enhanced in order to support the wildlife in the Priority Habitats and the Ancient Woodlands that virtually surround Crockleford heath. Any housing and in particular high density housing that is being suggested would threaten rather than support the habitats.
- 4.4. We fully support the aim to provide orchards, allotments and growing fields. The land is some of the best in the country and is productive at present. The proposed North and Central Communities (if both go ahead) should have the least dense housing to make sure that as much bio-diversity and productive land as possible remains and the aim to not affect the area's rural identity is delivered. Housing should come with adequate sized gardens to enable children to play outside, as well as householders to grow trees, shrubs, flowers and vegetables for their own enjoyment and consumption and to increase bio-diversity. Gardens are essential for well-being - from the very youngest to the elderly. These can have a positive impact on increasing mammal, insect and bird life.

*Links to policies* Requirements for all new developments; Buildings, Places and Character

## 5. Traffic and Transport Issues

- 5.1. The location of the Northern Settlement is such that that people will NOT use the Link Road to get in to Colchester or out to Ipswich/ Manningtree/ Harwich. 2500 houses proposed would cause enormous congestion in both directions.
- 5.2. We therefore don't support allowing traffic to enter/exit from/onto Bromley Road.
- 5.3. It is proposed that the Rapid Transport System (RTS) in its later phases would loop right through the heart of Crockleford- this suggests that significant development is planned in this area even though it is currently being designated an Area of Special Character. We understand the need for a functioning and effective rapid transport to encourage and enable the aspiration to move away from cars but do not think the case has been made that the aspirations can be delivered. Residents should be able to walk to the RTS. Cars would inevitably increase around all the lanes in Ardleigh and its locale. We are also concerned about the additional roadways needs to accommodate the new routes.
- 5.4. The maps are very confusing, the route of a proposed RTS is shown running parallel to the new link road before joining the A133. Is this another new road?
- 5.5. There will be severe traffic impact. Despite the intention to encourage the use of public transport and cycling, unless the routes are free, safe and time saving, we fear they will not be used. Residents will naturally use the Bromley Road than the new Link Road onto the A133 to get into Colchester.
- 5.6. Developers should be required to deliver net zero carbon emission.

*Links to policies* Movement and Connections

## 6. Other Landscape/ wildlife/nature

- 6.1. There is concern that any development that is on the Salary Brook slopes would be an eye sore. The Bellway development underway on these slopes, off Bromley Road, shows the negative impact on the landscape.
- 6.2. The land lost to the Bellway development (which was refused by Tendring District Council and allowed on appeal) should be replaced with an extension of the Strategic Green gap to envelop Crockleford Heath to prevent it being surrounded by development and to retain its special rural character. The land north of Bromley Road should be retained as agricultural land or extended country park. Development should not be allowed to encroach on ancient and other woodland. Light pollution should be kept to an absolute minimum.
- 6.3. We would wish to see the protection and improvements to accessibility of the Colchester Orbital routes as part of any developments.
- 6.4. Use of modern agricultural land- rather than ancient or historic farmland or other protected habitats. Although the loss of productive agricultural land for housing is regretted, if there is a choice it is surely preferable to use modern farmland rather than land with protected features. For this reason we think that there should be consideration of allowing the University to expand northwards rather than crossing the A133 in to the Salary Brook slopes and/or to consider some expansion of the central and south settlements. It may therefore be necessary look again at all the buffers proposed to strike an acceptable balance between maintaining distinction between existing communities and ensuring the new developments meet the objectives and policies for wildlife, nature, green spaces etc and do not destroy the hamlet of Crockleford.
- 6.5. We therefore cautiously support the location of part of the proposed expansion to the University of Essex. The University should be permitted to expand south of the A133 (Option 3 Alternative) but not to expand the Knowledge Gateway north of the A133.

*Links to policies* Nature, Sustainable infrastructure.

## **7. Historic impact**

- 7.1. Crockleford Heath has a settlement history going back many centuries and has six grade II listed properties all of which would be negatively impacted by any development. It is not just the immediate area around listed buildings that needs protection but the context of the landscape within which they sit. As previously mentioned the agricultural land within the boundaries of Crockleford Heath is largely classified as ancient (mediaeval) or pre modern. This land should be protected from development as it is essential to the local characterisation of the whole of Crockleford.
- 7.2. In addition, an extensive stretch of Bromley Road that runs through the Northern part of Crockleford Heath is on the site of the old Roman road which ran from the Hythe Quay in Colchester to the Mistley Quay. By placing a ruler on a map of the area showing Bromley Road the route of the road can be clearly seen. It seems likely that if there was a road there may well be other Roman remains that are yet to be discovered. Archaeological surveys of this area before any development would be essential.

*Links to policies Nature, Sustainable infrastructure.*

## **8. Infrastructure and pressure on services including water**

- 8.1. It is essential that the infrastructure requirements are in place before the first occupants move in to the new communities. Otherwise, the pressure on already- stretched services will be unacceptable. This includes pressure on
  - Ardleigh Surgery
  - Ardleigh Primary School
  - Water and sewage networks
- 8.2. There is already an unacceptable reliance on tankers to relieve pressure on the sewage network which impacts on Ardleigh residents though regular pumping in to (and out of) the network at the Ardleigh pumping station. We are aware of issues in many nearby villages compounded by recent housing, and other, developments in surrounding areas (at a scale which is modest in comparison with the plans for the TCB Garden Community).
- 8.3. Any development of any sort around Crockleford Heath will generate unacceptable and unmanageable levels of traffic on an already dangerously busy Bromley Road. This is covered above.

*Link to policies Infrastructure Delivery and Impact Mitigation*

On behalf of Ardleigh Parish Council  
25 April 2022

# Appendix 1

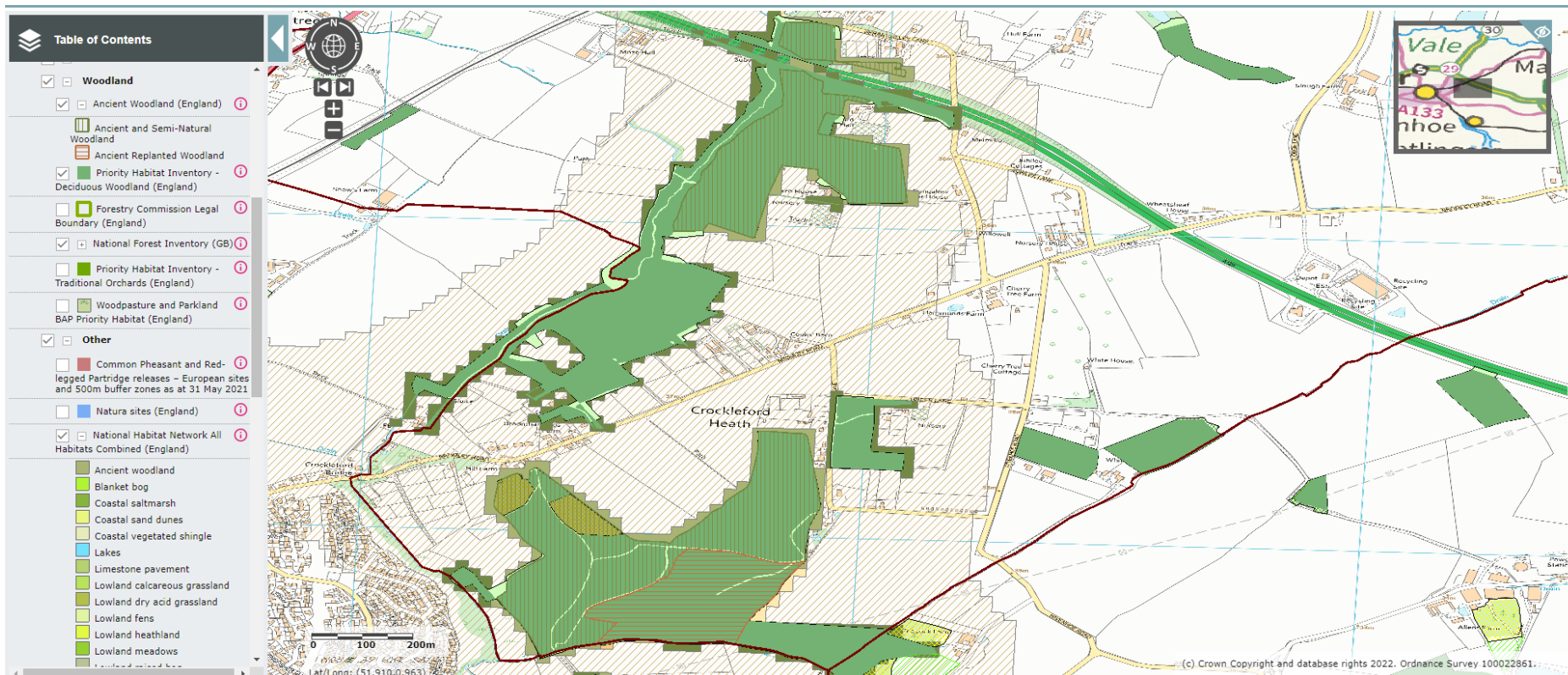
## Land Characterisation Crockleford Heath

The map below shows the areas within Crockleford that have particular designations. The areas in green are either Ancient Woodland e.g. Churn Wood and Hull Wood or other areas of deciduous woodland that are designated as Priority Habitats. Basically all the areas in green are recognised as important habitats for wildlife.

The area hatched in brown which covers virtually all of Crockleford Heath to the west of Spring Valley Lane and Wivenhoe Road is designated as a Network Enhancement Zone 2'. A Network Enhancement Zone 2 is land immediately adjoining existing habitat patches that are small or have excessive edge to area ratio where habitat creation is likely to help reduce the effects of habitat fragmentation. This is termed the 'Fragmentation Action Zone'. - Land within relatively close proximity to the Network Enhancement Zones 1 & 2 that are more likely to be suitable for habitat creation for the particular habitat and identifying possible locations for connecting and linking up networks across a landscape. This is termed the 'Network Expansion Zone'.

The only land on this map not designated in Crockleford Heath is largely land to the east of Spring Valley Lane and Wivenhoe Road.

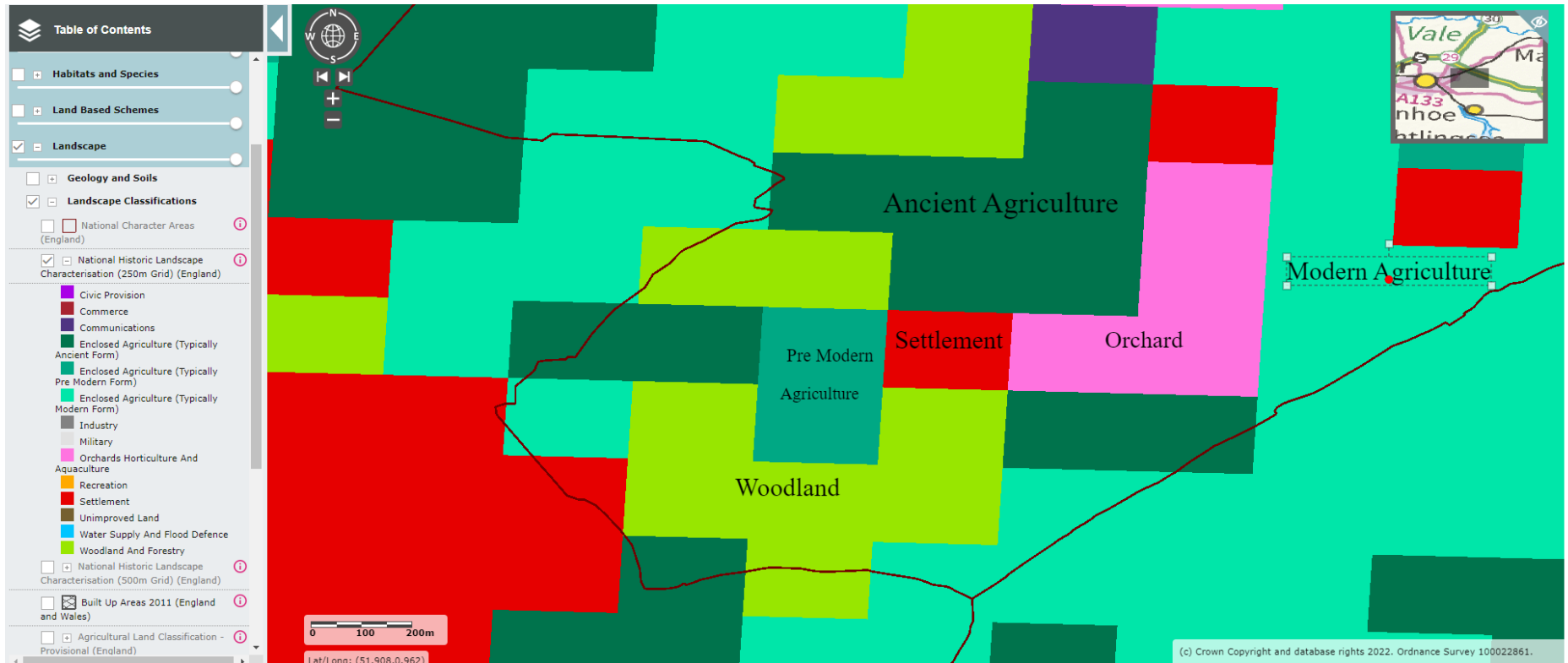
Map 1

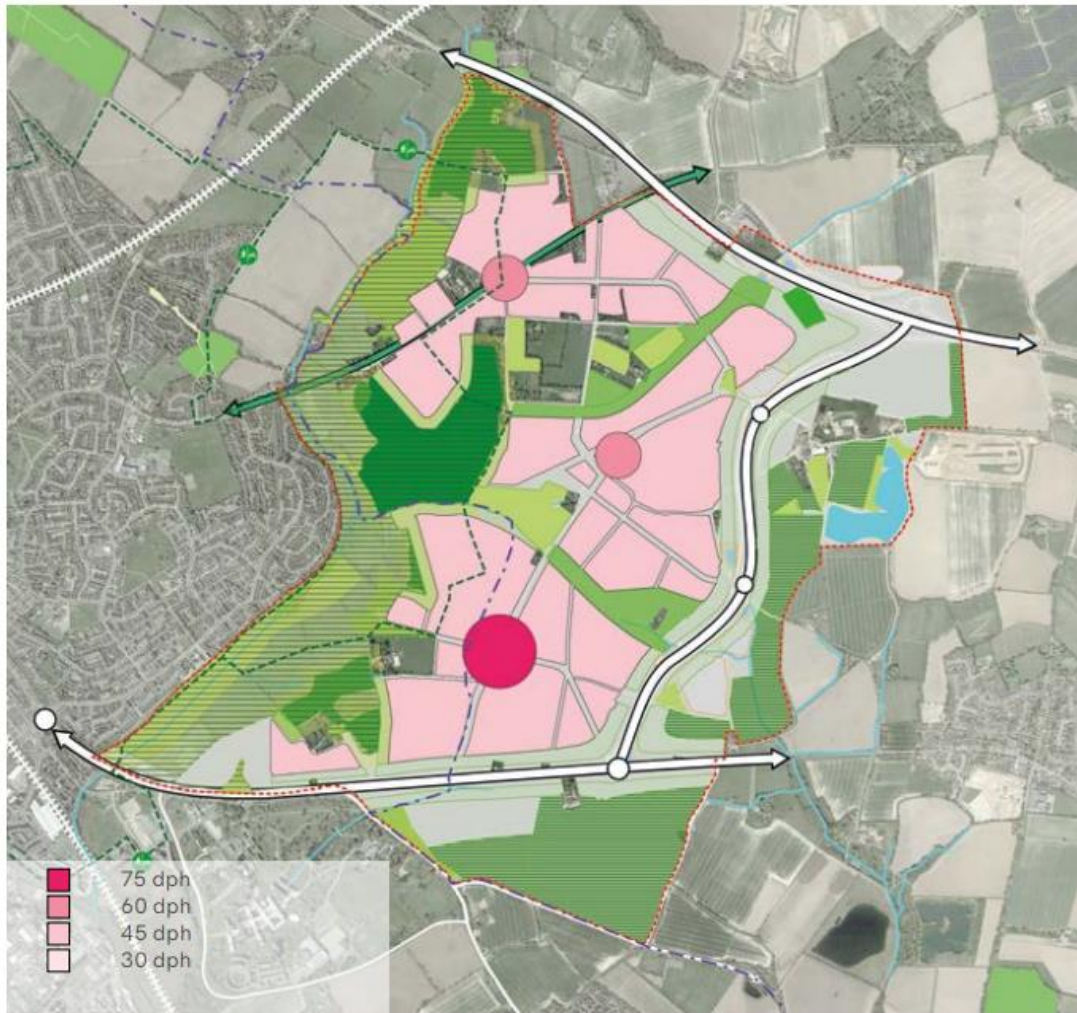


Map 2 below shows landscape classifications within Crockleford Heath

Map 2 below shows National Historic Landscape Characterisation (250m Grid) (England). The dark green areas are ancient enclosed agricultural land possibly medieval. The mid coloured green is pre modern agricultural land around the time of the 19th Century enclosures and the light green is modern agricultural land. The pink area is orchards or horticultural use and the lime green areas are woodland. These land characteristics make up the unique landscape characterisation of Crockleford Heath.

Map 2





Map 3 above shows the three proposed development hubs. Crockleford heath is primarily within the most Northern of the hubs.

### Conclusion

Based on the above analysis it doesn't seem that Crockleford Heath is a good choice at all for any development as it will have a disastrous impact on local habitats and the local characterisation of Crockleford Heath. The site in the west adjacent to Greenstead and the Bromley road has already been built on by Bellway Homes. The only other sites with relatively low impact is land east of salary brook and Jubilee road although some of that land is taken up by Blenheim Nursery. The only other piece of land with relatively low impact is a small triangle east of Wivenhoe Road and the A120 but that doesn't seem large enough to constitute a hub.

## Appendix 2

### CEAG Statement of Objection

1. There are no specific plans or commitment from the NHS to build a purpose-built health centre within the whole of the Garden community, set to be around 8000 dwellings. Recently the Ardleigh Surgery has removed Crockleford Heath from their catchment area. **We object to the master plan as the provision for healthcare will create real health issues for the residents within the Garden Community.**

2. The northern neighbourhood, one of the three proposed neighbourhoods of the Garden community, will be joined both to the new link road and to Bromley Road, creating a 'rat run' from the link road to north east Colchester, causing a massive increase of traffic into that part of Colchester, affecting not only Bromley Road, but Longridge, Greenstead, and St Johns. Development is already taking place on the Bromley Road and as we now understand development of the Garden Community around Crockleford Heath will commence before the link road. It is also unlikely that the RTS will be in place before the link road is built. **We object to the connection of the link road to Bromley Road which will seriously affect the hamlet of Crockleford Heath. A central part of the Garden Community principles is to respect current communities.**

3. The large development on Bromley Road, opposite the old Beehive public house is not included on the images within the masterplan, giving the impression of a wide green belt between Colchester and the Garden Community. There is a lack of detail in relation to the management of the 'Country Park' and the prevention of anti-social behaviour. **We object to the misinformation presented in the masterplan regarding the green buffer between the proposed Garden Community and Colchester. Furthermore there are no requirements within the plan for the green buffer to be in public ownership.**

4. The options that are preferred, option 3 and option 3 (alternative approach), provide the maximum buffers to Wivenhoe and Elmstead Market and the highest density increase to Crockleford Heath and the scattered communities. In particular there is no buffer for the hamlet Crockleford Heath. Crockleford Heath will end its days as a hamlet and become a suburb of Colchester, almost the size of Wivenhoe. Crockleford Heath is designated as an area of 'special interest'. As such it should be provided with more substantial green buffer zones. **We object to the destruction of Crockleford Heath, which is currently defined by roads, Bromley Road, Spring Valley Lane, Chapel Lane, Green Lane, and Wivenhoe Road. The 'protection' offered in the masterplan assumes a much smaller definition of Crockleford Heath, comprising only Chapel Lane.**

5. In relation to the RTS: much of the contents of the Plan is aspirational and there is no clear contract management plan for the RTS provider. A firm position on the operation of the RTS should be a major feature within the Garden Community masterplan. **We object to the current master plan as it does not give a strong enough commitment to the RTS, which will only increase traffic to Colchester.**

6. It is not clear in the master plan how housing density and mixture of tenure is going to be managed. In relation to Crockleford Heath, the Plan speaks about lower densities, but how is this going to be achieved if all three areas of the garden community are to have a balanced mixture of housing types? There needs to be a clear commitment to public ownership of green land within each neighbourhood, which should occupy at least 50% of each neighbourhood. This could be achieved by reducing the number of dwellings to the minimum required under the conditions of the link road. **We object to the master plan as it does not give clear commitment to 50% of each neighbourhood being public green space. A position that is required to guarantee green spaces within each neighbourhood in keeping with Garden Community principles.**

7. Currently the residents of Crockleford Heath and the scattered communities rely on a network of open ditches to manage water dispersal. As the Garden Community develops along with its separate drainage systems how will the water management needs of the current residents be managed? **We object to the master plan as it gives no guarantee that the water management of current residents will be respected and managed without additional cost to the current residents**