

23 October 2014

Report of	Head of Commercial Services	Author	Laura Chase
Title	Local Plan Update		 282473
Wards affected	All		

The Local Plan Committee is asked to note progress on the development of a new Local Plan

1. Decision(s) Required

- 1.1 To note progress in the development of a new Local Plan for the Borough, which will guide growth to 2032 and beyond.

2. Reasons for Decision(s)

- 2.1 To provide an update on the actions Council officers are undertaking to ensure the Council's planning policies are updated to provide a robust basis for guiding future growth in the Borough.

3. Alternative Options

- 3.1 There is no alternative option; the report is for information only.

4. Supporting Information

- 4.1 The August Local Plan Committee authorised initial work on a new Local Plan for the Borough. Following on from this, the report provides details of Local Plan work which is now underway, including:
- commissioning of evidence base studies;
 - communication and consultation with a wide range of stakeholders, including infrastructure providers, Parish/Town Councils, Residents Associations/Community groups, and adjacent authorities;
 - a Call for Sites; and
 - Sustainability Appraisal.
- 4.2 This early work will inform an Issues and Options consultation which is scheduled to take place in early 2015. The adopted Local Development Scheme provides the overall milestones for this process and notes the various member approval, consultation and publication stages that lead up to examination and adoption of the plan in 2016/17.
- 4.3 Council officers have now reviewed the existing planning policy evidence base to identify areas where additional work and/or updates are required. The report to the August Local Plan Committee identified work underway to guide development of an Objectively Assessed Need figure for housing, and noted that the Council would also need to produce an updated Employment Land Needs Assessment to inform the Issues and Options consultation, particularly since the last Employment Study was completed in 2007 prior to the recession.

Consultants Nathaniel Lichfield and Partners have now been commissioned to undertake the work. In September, the consultants held a workshop with officers in September with details of their interim findings, and this will inform the next stage of work. The project is due to be completed in November 2014. This work will help the Council to assess the existing supply and demand for employment land as well as trends influencing future demand for employment sites in the Borough.

- 4.4 Work on the Sports Facilities Strategy is on-going and is expected to be completed in December 2014.
- 4.5 Additional studies will be commissioned, if needed, to inform the later stages of plan development.
- 4.6 Council officers have now met with a range of infrastructure providers, detailed below, to begin the process of assessing the impact of different options for growth. At this early stage, in advance of clarity on growth options, the focus has been on identifying any major constraints, agreeing processes for joint work and understanding infrastructure providers' decision-making processes.
- Anglian Water – They established their willingness to work with CBC to develop appropriate processes to ensure sufficient water supply and guarantee water quality. They highlighted the importance of early involvement with developers once options are agreed.
 - Environment Agency - Agreed their willingness to develop a Statement of Common Ground as the plan develops to identify flood management and drainage issues.
 - Essex County Council (education, social care, libraries and culture) - In relation to school place provision, Colchester has existing capacity issues reflecting the current rise in the school age population. Further schools capacity will be required irrespective of growth options chosen. Further discussions will take place going forward, to help ensure the appropriate provision of school places.
 - Health – NHS England and Clinical Commissioning Group – Further work required to ensure co-ordination between different parts of the health service and CBC. Capacity will be related to how health services will be delivered in future. The future structure for the provision of health services is not yet known, but it is expected that more outpatient services will be delivered locally. This will mean that doctors' surgeries will need to incorporate more space for other medical services. Incremental growth would be expected to result in reorganisation of existing provision, rather than development of new facilities, given resource constraints.
 - Transport issues – Meetings have been held with the Highways Agency, Essex County Council and Network Rail. The main issues arising from the discussions were with regard to the timing of the release of key documents which would form part of our evidence base. Both the Highways Agency and Network Rail are planning to publish documents in the middle of next year. The Highways Agency Route Strategies, which will outline operational and investment priorities for the period April 2015 – March 2021, and give an indication of priorities beyond March 2021, will be produced in March 2015. The Network Rail Anglia Route Study, which will inform their Control Period 6 (2019 – 2024) is due to report in June 2015. A further meeting will be held with the train operator, Abellio Greater Anglia, regarding service constraints and station capacity.

- Electricity infrastructure network – UK Power Networks – The existing infrastructure has a good level of available capacity, over and above existing demand. However, some work to increase capacity would be required to meet the additional increase in development over the plan period, depending on the locations of growth. Some locations will be more difficult to deal with than others, but nothing that could not be overcome.
- Gas infrastructure network – National Grid - Analysis indicates that the existing low pressure infrastructure surrounding the Colchester area may require reinforcement to provide sufficient capacity to accommodate additional growth. Analysis on medium pressure infrastructure surrounding the Colchester area indicates that there should be sufficient capacity to meet future demand.

4.7 Meetings are also underway with Borough Parish/Town Councils and urban area community groups to inform them about the plan-making process and how they can be involved. Officers have met, or will shortly be meeting with, the following groups:

Parish Councils

Aldham, Boxted, Copford, Dedham, East Donyland, East Mersea, Eight Ash Breen, Fordham, Great Horkesley, Great Tey, Langham, Layer de la Haye, Marks Tey, Mount Bures, Myland, Stanway, Tiptree, West Bergholt and Winstred Hundred.

Residents Associations and Community Groups

Churchill Gate Residents Association, Hythe Forward, Riverside Residents Association and Roman-Castle Road Residents Association.

Feedback from meetings held thus far indicates that those attending found it useful to be briefed well in advance of the Issues and Options consultation, in order to allow time to develop informed opinions and to respond to a questionnaire seeking their views on Borough growth options and on local issues such as settlement boundaries.

- 4.8 A previous report to the April meeting of this committee highlighted the importance of the 'duty to co-operate' with adjacent authorities, given that it is a key requirement governing the judgement on whether a plan is 'sound' or not. CBC has accordingly been working closely with adjacent authorities, Braintree and Tendring in particular, as well as Essex County Council, to ensure a coordinated approach to future development. At this stage, the duty to co-operate involves meetings to identify issues and agree actions and further work. It also provides an opportunity for the establishment of a joint evidence base; rather than agreeing on any specific proposals.
- 4.9 The council undertook a 'Call for Sites' from 28 July- 6 October. This provided an early opportunity for individuals and organisations to suggest sites within the Borough for development. This information will be used to help develop growth options and, at a later stage, will be fed into the Strategic Housing Land Availability Assessment process which will assess the suitability of sites for development. This work will be an important consideration in the allocation of sites. It is important to note that the call for sites exercise does not in itself determine whether or not a site should be allocated for development; the Call is simply a process which feeds into the production of the evidence base. A general summary of the type and extent of proposals received will be tabled at the meeting.
- 4.10 The local plan development system provides for an iterative process for developing options which includes several rounds of public consultation and a Sustainability Appraisal process. The Sustainability Appraisal process is used to test the environmental, social and economic performance of the Plan options. The Sustainability Appraisal Scoping Report was published for public consultation from 1 July to 5 August 2014. The Scoping Report

establishes the sustainability framework which will be used to test the sustainability of the Plan options. The Council received consultation responses from 16 organisations and one individual, including Natural England and a number of parish councils. The responses are attached as Appendix 1, along with the Council's response. The comments received were used to help finalise the Scoping Report. Work will now commence on appraising the emerging Plan options, using the Sustainability Appraisal framework set out in the Scoping Report. This work will be published alongside the Issues and Options document in early 2015.

5. Proposals

- 5.1 It is proposed that members note the work being undertaken to further the development of a new Local Plan for the Borough.
- 5.2 As work progresses further, update reports will be produced for the Committee. The Issues and Options Document is expected to be published for approval at the meeting scheduled for 16th December.

6. Strategic Plan References

- 6.1 The Strategic Plan Action Plan includes a commitment to regenerating the Borough through buildings, employment, leisure and infrastructure. There are also commitments to attract investment and provide more affordable homes. The Full Review of the Local Plan will contribute towards achieving these objectives.

7. Consultation

- 7.1 Consultation on the Local Plan will be carried out in line with the Council's Statement of Community Involvement and The Town and Country Planning (Local Planning) (England) Regulations 2012. Because of the significant strategic nature of the Local Plan Review process, the Council will ensure a comprehensive and accessible consultation programme that reaches a wide range of stakeholders.

8. Publicity Considerations

- 8.1 Press releases will be issued at every significant milestone in the Local Plan process. The consultation is likely to generate publicity for the Council, particularly around some of the sites/land which cross borders with Tendring and Braintree.

9. Financial Implications

- 9.1 The Local Plan Review will be undertaken within a budget allocated for its production, including updating of evidence documents, consultation and examination.

10. Equality, Diversity and Human Rights implications

- 10.1 An Equality Impact Assessment has been prepared for the Local Development Framework and is available to view on the Colchester Borough Council website by following this pathway from the homepage: Council and Democracy > Policies, Strategies and Performance > Equality and Diversity > Equality Impact Assessments > Commercial Services > Local Development Framework.
- 10.2 There are no particular Human Rights implications.

11. Community Safety Implications

- 11.1 Development of a new Local Plan will address the community safety implications of creating sustainable communities.

12. Health and Safety Implications

- 12.1 Development of a new Local Plan will address the health and well-being implications of creating sustainable communities.

13. Risk Management Implications

- 13.1 The Focused Review of the Local Plan will help ensure that the Council's planning policies are robust and up-to-date and help to reduce the risk of inappropriate development being permitted.

14. Disclaimer

- 14.1 The information in this report was, as far as is known, correct at the date of publication. Colchester Borough Council cannot accept responsibility for any error or omissions.

Sustainability Appraisal Scoping Report Consultation

The Sustainability Appraisal (SA) Scoping Report was made available for consultation between 1 July and 5 August 2014 (5 weeks).

Regulation 12(5) of the Environmental Assessment of Plans and Programmes Regulations (2004) requires local planning authorities to consult Natural England, Environment Agency and English Heritage on the scope of the assessment. However, Colchester Borough Council decided to consult all stakeholders on the Local Plans consultation database. 16 organisations and 1 individual submitted comments on the Scoping Report.

The table, below, summarises each representation made and includes a response and where necessary details of changes made.

Respondent	Summary of comments	CBC Response	Suggested change
David Hammond, Natural England	1. The approach and methodology used in the Sustainability Appraisal is in line with the advice that would be offered by Natural England, relevant and appropriate legislation has also been identified. 2. Natural England welcomes the reference to the Dedham Vale Area of Outstanding Natural Beauty (AONB's) Management Plan. 3. References to the designated sites and the interaction between the green and blue ribbon networks could be identified more strongly, water receptor pathways should be considered as part of the Appraisal, not just in respect of water usage, waste water and flooding. 4. Under this section on pages 8 and 9 there appears to be no reference to the Habitats Regulations 2010, there in appendix 1 there is reference to Habitats Regulations 2004 (page 48), and the and Wildlife and Countryside Act 1981 (as amended)	1. Comment noted 2. Comment noted. 3. A detailed summary of each of the Natura 2000 sites is included in the Baseline Environment section. In addition to the sub-objectives related to water usage, wastewater & flooding the impact on the green and blue ribbon networks could be considered in the appraisal in relation to the following sub-objectives: public realm, healthy lifestyles, enhancing biodiversity and creation of new open spaces. 4. The SA does not review legislation, only plans and policies are reviewed. 5. A Habitat Regulations Assessment has yet to be completed. This will be completed and published at the same time as the Issues and Options document (Jan/Feb 2015). 6. Support noted. 7. The Council does and will continue to give consideration to the fragmentation of open spaces	None

	5. Based on the information available it is uncertain if a Habitats Regulation Assessment screening for Appropriate Assessment has been undertaken, and therefore there is no information on the potential for Likely Significant Effects on these sites. 6. There are ten objectives listed under this section, which can be broadly supported, and especially objectives 7 & 8. 7. The Council should give consideration to looking at the fragmentation of open spaces and the linking of them back to paths and other sites. 8. Generally Natural England is supportive of sustainable transport options such as walking and cycling, and the Council could give consideration to linking walking and cycling routes into the green chains/corridors infrastructure to promote and encourage these options.	and linking them back to other sites. The Council has a Green Infrastructure Strategy, which has been reviewed in the scoping report. As part of the appraisal of sites opportunities will be taken to identify improvements to the green infrastructure network. 8. Agreed, see comment above.	
David Burch, Essex Chamber of Commerce	No comments that we wish to make and are happy to accept it as proposed.	Noted	None
Cheryl Damen	1. Essex Public Rights of Way Improvement Plan should be reviewed. 2. A key topic excluded from the baseline is safe, off road public rights of way for cyclists and horse riders. 3. Starting on P31 (Social Framework) mentions efficient use of land in developments (to me includes ensuring objectives around access for multiple user groups is included in the planning stages and paid for by s106 contributions) and protecting and creating open spaces but doesn't talk about who can use them. 4. There is reference to the Essex Transport Strategy which has countywide priorities to reduce	1. Agreed 2. Agreed that the baseline should refer to the lack of safe off road public rights of way for cyclists and horse riders. 3. This would be too detailed to include in the SA Framework. However, as part of the appraisal different types of open space will be considered. 4. Noted 5. References to improving and promoting the cycle network are included as they are referred to in some of the plans and policies reviewed. 6. The Planning Policy Team has met with the Essex Bridleways Association and is actively working with them on improvements to bridleways	Add the Essex Public Rights of Way Improvement Plan to the review of plans and policies. Add the following sentence to the Baseline Environment section (page 12): "There is a lack of safe, off road public rights of way for cyclists and horse riders in the Borough."

	accidents and deaths and promote safe and secure travelling environment. It really is only a matter of time before someone on a horse (or car) or bike is killed or seriously injured on the busy roads around Boxted, Langham, Highwoods and Great Horkesley due to a car and horse/cycle collision. 5. There is reference to improving and promoting cycle networks but this must be changed to multi-user tracks (i.e. bridleways) as otherwise horse riders cannot legally use the paths that would otherwise provide safe, off-road access. 6. Finally in this section the reference to the Park and Ride reminds me that I have tried though various routes to have the cycleways made multi-user tracks (again bridleway). This would link with the footpath through Severalls Park that is to be upgraded to a bridleway and the bridleway that starts by the A12 and runs by the Flakt Woods factory.	throughout the Borough.	
Wendy Bixby, Sustainability Projects Officer, Colchester Borough Council	1. The correct title of the environment strategy is Environmental Sustainability Strategy (ESS). 2. There are a number of sustainability issues identified within the Environmental Sustainability strategy (ESS) which are not mentioned within the scoping report.	1. Noted 2. The Environmental Sustainability Strategy has been reviewed and all relevant sustainability issues have been referred to in the Scoping Report.	Correct title of Environmental Sustainability Strategy on page 9.
East Donyland Parish Council	It was felt the report should include objectives within the Local Plan that address the issue of providing services for a growing population of both older and younger people.	The provision of services for a growing population is included in the SA Framework. This includes both the older and younger population.	None
Councillor Gamble	Colchester's SASC is excellent but also worrying. The problem as I see it is that any plans we may have will be knocked by Tending's proposals that I have heard could mean another 6000 units on our border (right up to our borders) that would mean about an extra population of say 20000. Thus	Comments noted and will be considered as part of future SA work appraising options	None

Heidi Kelly, Rydon Homes Ltd	effectively expanding Colchester but in Tendring. The prospect of more housing on our side of the border will put a completely unacceptable burden from the sustainability point of view on Colchester. I do not believe that what Tendring is proposing is sustainable in terms of infrastructure, provision for education, medical facilities etc. Can you imagine what it would mean for say the 6th Form College and Colchester General. Then if you add any from within Colchester then it is a nightmare scenario. I would ask that in any discussion with Tendring that the housing is kept to a minimum on our borders and a gap is maintained between Colchester and Tendring housing. I would also ask that no more housing is allowed on our side of the border in North and East Colchester to protect services.		
	1. The opening paragraphs do not sufficiently reflect the NPPF. 2. The local authority will need to demonstrate that it has tested every opportunity to meet its objectively assessed need for housing before arriving at the preferred outcome. 3. It is not always correct to dismiss a potential housing site because it cannot be supported by capacity in the existing infrastructure. This does not necessarily make it an inappropriate or unsustainable site. Equally, it does not always follow that a relatively remote brownfield site which could enable regeneration is automatically more sustainable than a better located greenfield site on the edge of the main urban area. Relevant weighting must be given to assessment criteria and this process of weighting and ranking of sites	1. Additional sentence added. 2. Comment noted. The Council is working to identify its OAN. As part of the SA various options will be appraised. 3. Comment noted. 4. The evidence base is being updated. The SA Scoping Report marks the beginning of plan preparation and clearly evidence is continuing to emerge. 5. It is agreed that housing supply is a key issue. This is identified in the Scoping Report and the first SA objective is: To ensure that everyone has the opportunity to live in a decent, safe home which meets their needs at a price they can afford. 6. Agreed. 7. Whilst brownfield development may be preferable this does not mean that greenfield sites	1. Add the following sentence to the opening paragraphs: "The SA is a mechanism for considering the impacts of a draft plan as well as the alternatives to that approach in terms of key sustainability issues, with a view to avoiding and mitigating adverse impacts, maximising the positives and contributing to sustainable development." 6. Amend the first SA objective as follows: "To provide a sufficient level of housing to meet the

	and policies through the SA process must be transparent. 4. If not already proposed by the Council we would suggest this evidence base needs to be updated if it is to be used to inform the SA. 5. One of the key considerations within the SA objectives should be to provide sufficient housing to enable people to live in a home suitable for their needs and which they can afford. 6. The wording used in objective 1 should be reflective of the requirement to meet the objectively assessed need for housing in full. 7. The criteria of objective 2 needs to be revised to recognise that brownfield development may be preferable but greenfield release is likely to be needed in order to meet OAN and that development should be directed to areas with good access to services and facilities to satisfy the NPPF presumption in favour of sustainable development. This will ensure that both brown and greenfield sites can be selected for allocation in the emerging Local Plan.	will not be allocated for development. The Council recognises its duty to identify its objectively assessed need for housing and that this is very likely to result in the release of greenfield sites. One of the assessment criteria of objective 2 recognises the importance of good accessibility by a choice of means of transport.	objectively assessed needs of the Borough to enable people to live in a decent, safe home which meets their needs at a price they can afford".
Angela Gemmill, Marine Management Organisation	No comments to make.	Noted	None
Sue Bull, Anglian Water	I attended the scoping workshop on 28 April 2014 and am pleased to see all the points raised have been included in the report and I therefore have no additions or amendments to suggest.	Noted	None
Anthony Dedham Council	1. The Report makes no reference to the financial situation of CBC which is resulting in all services being cut, reduced or subject to steep price increases. Therefore many of the intended policies will not be implemented thoroughly or successfully because of monetary constraints and are	1. It is not necessary for the Scoping Report to comment on Colchester Borough Council's financial situation. The SA Scoping Report sets the scope of the SA of the Local Plan. The policies within the Local Plan relate to the development and use of land.	None

	unrealistic. 2. Rural communities are especially vulnerable to the withdrawal or reduction of essential services. Dedham residents are extremely concerned by: - Transportation. The bus service is at a bare minimum and regularly under threat of withdrawal. - Communications. Parts of the village have no mobile phone coverage or a service which is unreliable or poor. - Roads. The surfaces are poorly maintained and road safety is compromised by the lack of regular cutting of hedges and verges. - the threat to businesses in the High Street from increased business rates and parking charges. - Development. It is imperative that the protections afforded by the AONB and the conservation areas are enforced, otherwise the character and beauty which attracts thousands of visitors annually to the area will be degraded. However, it may be appropriate to re-examine the size of the village envelopes in view of the growth in the population. - Housing. Rising prices and the conversion of small houses to large properties have reduced the opportunities for the young and the elderly to remain in Dedham. The reduction in affordable housing content from 35% to 20% aggravates the problem. 3. Dedham Parish Council must increase revenues to pay for services no longer provided by CBC through council tax. Voluntary, unpaid labour can only do so much. We wish to see this acknowledged in your report together with some policy suggestions to mitigate the problem Sustainability is otherwise just an empty word.	2. Comments noted. It is acknowledged that rural areas experience many different problems and issues to urban areas. The Local Plan will seek to ensure that this is acknowledged. The spatial policy team has asked to meet all Parish/ Town Council's to discuss issues of importance, including re-examining settlement boundaries. 3. It is not within the scope of the SA to comment on the financial situation of Parish Council.	
Tom	Gilbert-	1. The review of relevant plans and programmes	4. 3 pages taken from the

Wooldridge, English Heritage	reference to the Council of Europe's European Landscape Convention, to which the United Kingdom is a signatory. 2. We welcome reference to the PPS5 Practice Guide which, contrary to the statement on page 43 of the report, remains an extant document. 3. In terms of local plans and programmes, it would be helpful to include reference to the Borough's conservation area appraisals and management plans. 4. Under the Environmental Characteristics heading, we welcome the first and second paragraphs on the historic environment, although the report could provide a greater overview of the Borough's historic environment in terms of different locations and time periods. 5. The number of listed buildings and scheduled monuments should be double checked as the figures in the report differ from the figures in the Heritage Counts. 6. In terms of heritage at risk figures, the second paragraph should distinguish between the national and county registers. 7. In terms of the likely evolution without the Local Plan (Question 4), we would argue that there would be increased harm to the Borough's historic environment through the lack of a clear and up to date local planning framework. 8. We note and welcome the identification of the historic environment as a key sustainability issue. Explicit reference to heritage at risk would be helpful as a specific issue. We would welcome further discussion on historic environment issues and how they relate to the SA and the Local Plan. 9. We are happy with SA Objective 7 as it relates to the historic environment, although it would be	does not include legislation. 2. Noted 3. The Borough's conservation area appraisals and management plans are in the process of being updated and updated plans will be added to the review. 4. Detail from the Historic Characterisation Project has been added to the baseline to provide a greater overview of the Borough's historic environment. 5. This difference in figures can be explained because the Heritage Counts count listed building entries, rather than numbers of individual listing buildings. There are many examples of groups of listed buildings around the Borough, which explains for the difference in figures. 6. Details of the national Heritage at Risk Register has been added to the text and the baseline data table has been updated. 7. Agreed 8. Noted, it is agreed that further discussion would be beneficial. 9. Agreed	Historic Characterisation Project has been added to the baseline section. 5. The Heritage Counts have been added to the baseline data and an explanation of the difference in the figures is included. 6. Update baseline data table to include national figures for buildings at risk. 7. Add the following to the likely evolution without the plan section: "Colchester has a rich historic environment and without the Local Plan including a positive strategy for the conservation of the historic environment there is a risk that there would be increased harm to the Borough's historic environment through the lack of a clear and up to date local planning framework." 9. Amend all references from historic assets to heritage assets.
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	consistent with national policy to refer to heritage assets, rather than historic assets.		
Essex Bridleways Association	1. The following documents should be added to the review: The Essex Public Rights of Way Improvement Plan, The Rights of Way Circular 1/09, Development and Public Rights of Way advice note for Developers and Development Management Officers; and the Highways Agency Strategic Plan for Sustainable Transport. 2. One major topic excluded from the baseline is the need to provide a safe linking off road public rights of way network. Another topic is the need to build a healthy community. 3. If the Local Plan does not properly address the question of rights of way, and bridleways in particular as identified by the PROWIP & NPPF, then CBC will not satisfy the requirements of the people of the Colchester district and the Local Plan will not be sound. There is a question of discrimination against horse riders. Numerous additions to the Scoping Report to refer to bridleways are suggested.	As an overall comment it is important to note that the SA Scoping Report does not include any proposals. It is not a draft Local Plan. It sets out the scope of the Sustainability Appraisal of the Local Plan. The extent to which changes to the document can be made to refer to bridleways is therefore limited. However, the detailed comments submitted by the Bridleways Association will be considered when drafting the Local Plan. 1. Agreed, with the exception of the Development and Public Rights of Way advice note, which could not be found. 2. The baseline section sets out the Borough's baseline. These topics would be more appropriately considered in the Sustainability Issues section. 3. The provision of multi user rights of ways will be considered as part of the Local Plan, Master planning and the development management stage. Many of the comments are to add in reference to bridleways in the review of relevant policies and plans table. However, this table summarises the content and aims, objectives and targets of existing policies and plans. It does not include the Council's own aims and objectives for the Local Plan.	1. Suggested documents added to the review.
Rose Freeman, The Theatres Trust	1. Your theatre should be located within the proposed cultural quarter as this is the 'anchor' for your cultural offer. We cannot find a map of the location of St Botolph's Quarter so hope that your Mercury Theatre, Odeon and Arts Centre are within its boundaries. 2. We are pleased the Scoping Report includes	1. Noted 2. Noted, the Local Plan will consider cultural infrastructure. 3. The SA framework includes the following two sub-objectives of relevance to community facilities: will it support tourism, heritage and the arts? And will it provide equitable access to education.	None

	cultural infrastructure to reflect the National Planning Policy Framework item 156. However, it is only mentioned once on page 71 and we suggest it should be given more prominence as an NPPF strategic priority. 3. The document includes the supply of an 'adequate provision' for community facilities, but does not mention 'protect and enhance', as distinct from cultural heritage structures and assets. The Objectives should therefore include an item to protect and enhance all community and cultural facilities for the reasons given above and to reflect the National Planning Policy Framework item 70. 4. New development should only be an option when existing structures have lost their viability, or similar facilities are required elsewhere. For sustainability, all policies should support improvements to existing infrastructure and then provide criteria for new, if required. 5. We are concerned that there may be some confusion with regard to the term 'cultural heritage'. Cultural heritage includes the preservation of sites, features and areas of historical, archaeological, geological and cultural value and their settings – this includes listed buildings, public parks and gardens, landscapes, ancient monuments and conservation areas. It should not include theatres, cinemas, museums, libraries, art galleries, public art and street festivals which are within another grouping of cultural facilities for cultural activities. The distinction should be made clear. The SEA theme on page 71 should not be Cultural Heritage, but Cultural Infrastructure because this section is dealing with ongoing cultural activities, infrastructure to support such activities, and the proposed cultural quarter.	recreation and community facilities? The protection in addition to the enhancement of and provision of new community facilities will be considered under these sub-objectives. 4. Noted 5. This comment is understood however, cultural heritage is an SEA theme. The SA Framework lists all relevant SEA themes.	
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Carolyn McSweeney, Tiptree Parish Council	1. The data provided should also be accompanied with percentage indicators, ie. numbers of population against existing numbers, for example, 830 dwellings per annum over existing 71634 dwellings, is 1.15% increase. Household data should be provided as percentages. Colchester is compared against adjoining districts, but none of the increases in the adjoining districts are quoted in percentages. 2. The chart in the baseline data is incomplete and missing important headings. Totals that include additions and existing floor space would be clearer. 3. Data should also include percentage of floor area against either footfall or the number of car parking spaces. There are no indicators for affordable commercial premises. There are no indicators of numbers of owner occupiers, numbers of investment property or landlords, space available for rent or space/land for purchase. Business ownership increases inward investment and a longer term stability for employees. 4. Baseline data should include comparisons of average income, against average housing costs. These costs should include full ownership, part ownership, private sector rental and social/council housing. Similar comparisons should be made with other districts. 5. Colchester shows higher than average house prices, but lower than average income. Why? What influences this? How can this be reversed? 6. What about the lower income? What is affordable? 7. The town centre development - does this have affordable sufficient parking for existing and future	1 – 4 The baseline data includes available data and it is considered that it adequately outlines the baseline environment of Colchester Borough. Baseline data was discussed at the Scoping Workshop in April 2014 and stakeholders suggested a range of additional sources and indicators, which were all added. Data from other local authorities, county and the region has been included where available. 5. The issue of housing affordability will be considered as part of the Local Plan. 6. Affordable housing is defined in the NPPF as follows: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. 7. Car parking in the Town Centre is an issue that will be explored as part of the Local Plan. 8. Noted. 9. Noted.	None
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Matthew Spatial Manager, County Council Jericho, Planning Essex	needs? Fast efficient access to parking areas requires infrastructure. 8. Cycling - good safe cycle routes with secure storage in shopping and employment locations are required. There are no such areas other than privately owned sites. This would encourage cycling. 9. A good location must be supported by good communication to the rest of the region.	1. A cross check should be made of plans listed on pages 8, 9 & 10 and Appendix 1. 2. The following plans should be added to the review: - SEA Directive - Birds Directive - Waste Framework Directive - Air Quality Directive - Habitats Directive - Planning Policy for Traveller Sites - PPS10 Sustainable Waste Management - England's Biodiversity Strategy - clarity sought in relation to the LEP growth deal - Joint Municipal Waste Management Strategy for Essex - Essex Gypsy and Traveller Accommodation Assessment - Various amendments suggested to the summaries of County documents - Local Flood Risk Management Strategy 3. The following issues are not covered in the review: local wildlife sites, local nature reserves, special roadside verges, accessible natural greenspace criteria and biodiversity offsetting. 4. The baseline data is generally comprehensive; however it could additionally focus on other areas (examples given).	1. Noted 2. The review of relevant plans and programmes does not include legislation. Planning Policy for Traveller Sites is included. Other documents referred to added to review and suggested amendments made. 3. No plans covering these issues are suggested for review. It is considered that the review is thorough and covers all SEA themes. The review is only one part of the scoping exercise and these issues are covered in other sections. 4. The baseline data is comprehensive and has exhausted the Borough's data sources. The evidence base is continuing to emerge (including data from the 2011 Census) and as more evidence becomes available additional data will be added. No data sources are suggested by ECC and whilst it is agreed that it would be helpful to include data in relation to the suggested topics the spatial policy team does not have access to data on these topics at Borough level at present. 5. Agreed 6. The sustainability issues sections outlines the key sustainability issues facing Colchester Borough. These issues are derived from the review of policies, plans and programmes and baseline data. There is no need to expand on this.	2. Suggested documents added to the review and suggested amendments to County documents made. 5. Various additions made to address comments about likely evolution without the Local Plan. 17. 'will it deliver a mix of uses' added to the second objective. 21. Number of SUDS schemes approved by ECC added as an indicator to the assessment criterion 'will it improve water quality'.
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	5. Numerous comments are made about the likely effects without evolution of the Local Plan covering the following topics: flood risk, recreation and wildlife, population, ecosystems and landscape, climate change, AQMA and housing. 6. More information should be included in the sustainability issues section about sustainable travel. 7. Education is recognised as an issue. This should make clear that safe direct routes are needed and that ECC does not have the capital to fund new schools. 8. The approach set out in the England Biodiversity Strategy should be used as part of the backdrop to the SA. 9. The Natural Environment and Rural Communities Act 2006 requires all public bodies to have regard to biodiversity conservation when carrying out their functions. 10. Habitat Regulations Assessment should be undertaken at the strategic level. 11. It would be useful to see how the framework would be used when appraising new Local Plan policies. 12. It is recommended that a site proforma/assessment framework for the appraisal of sites is created and consulted upon. 13. It is felt the objectives and assessment criteria are not sufficiently robust to adequately measure the quality of the Borough's biodiversity. 14. It is suggested that the Borough Council considers calculating the quantity and quality of sites designated for wildlife that are adversely impacted by development. Proposals that result in a net gain in Priority Habitat should be supported. The Borough Council should also explore	7. Noted 8. Noted 9. Noted 10. A Habitat Regulations Assessment screening opinion will be published at the same time as the Issues and Options document. 11. Noted 12. It is not considered that a separate framework for sites is required. For consistency it is important to use the same framework. The Council successfully used the same SA framework for the Core Strategy, Site Allocations and Development Policies. 13. Noted, it is considered that one objective on the natural environment is sufficient. Natural England support the objectives relating to biodiversity. 14. The SA will draw out the differences between quality of wildlife sites. Proposals that result in a net gain in priority habitat will be favourably appraised in relation to the natural environment objective and balanced with all other objectives. There is assessment criteria that relates to open space and sustainable buildings. 15. A specific assessment criteria is included in relation to school places. ECCs advice will be sought in relation to this. The indicator that refers to sustainable travel time is an existing indicator and will help the Council monitor whether new residential development is within 30 minutes of public transport time of a GP, hospital, primary and secondary school, employment and a major retail centre. 16. Noted 17. First point agreed, water infrastructure is covered in another objective.	
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	opportunities for greening developments and could set an objective to encourage this process. 15. A key issue for ECC is to ensure there is a sufficient provision of primary, secondary, and Early Years and Childcare places, and that such places are located within walking distance of new housing development and, in particular via safe direct routes. It is not suitable to state new development is located within 30 minutes of community facilities, as this could imply 30 minutes by bus. 16. Objective 1. - The indicators should ensure they reflect the issues raised from the SHMA. 17. Objective 2. - This could refer to the 'mix of land uses' provided as part of a development, which would be relevant if the new Local Plan is seeking to provide large strategic/sustainable development locations to accommodate new housing, jobs, community facilities etc. - Reference to infrastructure provision such as water, sewerage, electricity and gas could be included as part of this objective. 18. Objective 3 - Could an indicator be the number and/or type of jobs created across the borough or in specific growth/regeneration areas? 19. Objective 4 - This could include dates and/or milestones as an indicator, similar to those used in Travel Plan targets. Objective 4 could also be linked to Objective 6 around improving and reducing inequalities in health and in particular encouraging a healthy lifestyle through active travel (cycling and walking). An indicator could refer to the provision	18. It is not possible to appraise the number and type of jobs to be created under different policies and options for growth at this stage. The SA framework does refer to a range of jobs being created. 19. It is not possible to identify dates and/or milestones at this stage. An assessment criteria relating to improving sustainable transport linkages is included, which will pick up the provision of new cycle paths. The indicator relating to 30 minutes is already monitored by the Council and it is not possible to amend this indicator. Reducing pollution is included under another objective. 20. Archaeological heritage is included within the English Heritage and NPPF definition of heritage assets. 21. First point agreed. The second point about the Environment Agency is an established monitoring indicator.	
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	of new cycle paths (total length provided). - ECC requests that reference to new residential development being located within 30 minutes of a school is removed. The indicator should refer to <i>walking distance to a school via a safe route</i>. It is not suitable to state distance by public transport as ECC would be responsible for the revenue costs but proximity to a school does not mean it has the capacity, or the scope to expand, especially if distance is 30 minutes by public transport. - Reference to AQMAs and reducing pollutants might be an appropriate assessment criteria and indicator for this objective. 20. Objective 7 - This could refer to archaeology in the assessment criteria in light of the Borough's rich archaeological heritage. 21. Objective 10 - This includes an 'assessment criteria' stating 'Will it improve water quality?' The number of SuDS schemes approved by ECC could be used as an indicator. - Would the Borough Council ever grant planning permission contrary to the advice of the Environment Agency? If not, there may be a more appropriate indicator.		
Myland Community Council	The response from Myland Community Council included a number of questions, in addition to comments. The questions have not been repeated in this summary. However, a member of the spatial policy team met with MCC in August 2014 and it is hoped that she was able to answer these questions. 1. Referencing would be easier if the report contained paragraph numbers. 2. MCC acutely recognises one of the biggest	1. Noted, this will be considered when drafting future SA Reports. 2. Noted 3. Noted 4. Noted, the future of the Town Centre, including its boundary will be considered as part of the Local Plan. 5. Noted, we will continue to work closely with Essex County Council as Education Authority. 6. Agree that nature conservation sites should	

	challenges being traffic growth, in particular its impact on North Colchester. This must be a key area for resolution prior to any commitment to further house building in Colchester. 3. Neighbourhood centres should be developed to minimise traffic movement needs through known bottlenecks, e.g. North Station. 4. Thought should be given to re-defining and re-focusing on what the Town Centre should aim to be, e.g. if tourism is so important should the focus be on the Town's historic features, their presentation and accessibility? 5. MCC recognises issues surrounding pre-school care, primary and secondary school places, further and adult education under-provision. Unless the new Local Plan can adequately and effectively address these issues the house building programme must be drastically reduced in future years. 6. Given the pressure on the Borough's environment due to recent and current house building programmes, the SSSI sites and Local Nature Reserves must be given maximum protection. 7. Agreed, "...important to ensure that Colchester does not lose its identity..." 8. Agreed, it will be vital that a holistic approach is taken to the factors that must be harmonized to match population growth with economic growth and the ageing population. This holistic view must be established prior to committing to more house building. 9. If there is already "unsustainable pressure on all services" then representation to ECC and Government must precede any further commitment to house building and in particular for Colchester	continue to be afforded protection. There is a hierarchy of sites, with sites notified at the international level enjoying the highest level of protection. 7. Noted 8. Noted 9. Noted 10. The absence of an objective covering the ageing population does not mean that this issue will not be considered as part of the Local Plan. The first objective on housing refers to meeting the housing needs of the Borough, which includes the ageing population. 11. There is a separate objective covering transportation issues. 12. Noted 13. Noted 14. Noted, although these do not relate to the Sustainability Appraisal or Local Plan. 15. Noted, although these do not relate to the Sustainability Appraisal or Local Plan. 16. Agreed 17. The indicators are taken from the Annual Monitoring Report and are a means for the Council to monitor the effects of the Plan. Unfortunately there is currently no indicator concerning local wildlife sites.	
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	see 4 and 5 above to re-balance the burden among neighbouring authorities. 10. Where is the objective to address the aging population problem? This is not going to go away and is acknowledged by CBC as just going to get worse – over 65's increasing by 50% by 2032! This should be a separate more significant objective. 11. Apart from Objective 4 "To achieve more sustainable travel behaviour, reduce the need to travel and reduce congestion" there is no specific objective to "improve transportation and attractive travel links" this is imperative for the existing and future residents as well as tourism and should also be a separate more significant objective. 12. "<i>Maintaining and enhancing the natural and built environment</i>" is equally important to the key economic provider, tourism. 13. "<i>Strategic green gaps</i>" are vital to quality of life and sense of place factors within settlement areas and MCC will take all possible steps to retain as much green space at the current Rugby Club site should the Club be relocated. 14. CBC should take steps to publicise the responsibilities placed on authorities and landowners to maintain water courses in accordance with the latest Flood Risk Strategy. 15. The decrease is probably due to people recycling more. CBC should reconsider its policy to provide just one roll of clear recycling bags to households and increase it to two. 16. At Objective 6 add "well-being" after "health". 17. At Objective 8 add Local Nature Reserves under 'indicators'.		
Andy Stevens, ASP on behalf of Gateway	1. There is no mention of the A120 Wider Economic Impacts Study produced by Atkins for	1. Agreed 2. Report not accessible, however if it becomes	1. Add review of this document.

120 Ltd	EEDA in October 2008. 2. The Haven Gateway commissioned report on further economic benefits from Peter Brett Associates should be added to the review. 3. A12/A120 Route Based Strategy was produced by the Highways Agency and should therefore be included in either the 'national' or 'regional' sections of the lists. 4. Reference should be made to the East of England Route Strategy Evidence Report produced by the Highways Agency and dated April 2014. 5. It is noted that the date given in the list for the SELEP Growth Deal is 2004 when it should, of course, be 2014. 6. Under the heading 'Neighbouring authorities' is a list of some documents of relevance but the list appears somewhat incomplete. Reference is made to the Tendring SHMA and of the Colchester SHMA in the 'Local' section. There is however no reference to the Braintree SHMA. 7. Similarly there is no mention of Maldon's SHMA. 8. There is no comment on the emerging Maldon and Tendring planning frameworks. 9. The SA refers to the Tendring 'Economic Development Strategy' of 2013 but does not acknowledge the similar work by Braintree. That authority has produced two reports of note that we consider should be included in the SA Assessment; - "Going for Growth, Investing in your future" which was published in June 2009 and the "Braintree District Economic Development Prospectus 2013/2026". 10. Discrepancy on page 24, which refers to the Haven Gateway Infrastructure Study. 11. Whilst we would support the points raised in	available it will be added to the review. 3. Noted 4. Agreed 5. Noted 6. Tendring's SHMA was referred to as this was suggested at the scoping workshop. Agree it would be consistent to add Braintree's SHMA. 7. As above 8. The review includes recent and adopted development plans of the neighbouring planning authorities. 9. Agreed that the Economic Prospectus should be added to the review. The other document is 5 years old and will not be added. 10. Remove discrepancy. 11. Agree to add further text about planned, coordinated development. 12. It is not within the scope of the SA Scoping Report to start generating options for development. 13. There is a criterion stating 'Will it improve the delivery of a range of employment opportunities to support the growing population?'. This will cover the issue raised of balancing the local economy with large scale development. 14. The assessment criteria cover reducing the need to travel and levels of sustainable travel. 15. The SA Framework is based on the review of policies and plans, baseline data and the sustainability issues facing the Borough. It does not generate options and nor does it tailor objectives towards certain options.	3. Refer to document under national documents list. 4. Add review of this document. 5. Typo amended. 6. Summary of Braintree's SHMA added to review. 7. Summary of Maldon's SHMA added to review. 9. Braintree's Economic Prospectus added to the review. 10. Minor amendment to address discrepancy. 11. Further text added as suggested.
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	the likely evolution without the plan section we would add that the potential significant adverse impacts of failing to bring forward a fresh Local Plan are much greater than as suggested. 12. It should also be suggested in the report that there may be alternative means of reducing the impact of future development in a transport sense that could be achieved through appropriate strategies in the Local Plan. 13. An additional question should be asked as to whether support for the local economy is provided in a balanced way with new large scale development so as to create new centres, in addition to the support for existing centres. 14. There should also be a reference to whether proposals make a positive contribution to sustainability by enhancing the manner in which new development can achieve a more suitable situation by fully embracing sustainability opportunities at the outset and the extent to which those opportunities will also indirectly benefit the existing situation, for instance by reducing congestion and journey to work times as well as enabling walking or cycling to work. 15. It is our view that testing alternative forms of development against the need to create more sustainable communities should encompass questions as to the efficiency of a new settlement approach in comparison to the principle alternative of effectively seeking solutions that do least damage to the existing situation.		
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