

Local Plan Committee

19th December 2016

Item
7

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|----------------|---|--------|------------------------------|
| Report of | Head of Commercial Services | Author | Karen Syrett 01206 282476 |
| Title | Local Plan Preferred Options – Consultation Report with Responses | | |
| Wards affected | All | | |

The Local Plan Committee is asked to consider officers draft responses to the Local Plan preferred options consultation.

1. Decision(s) Required

- 1.1 To consider officers initial responses to the representations received following public consultation on the Colchester Local Plan Preferred Options.

2. Reasons for Decision(s)

- 2.1 To make members aware of the representations received and to inform the submission draft of the Local Plan.
- 2.2 Section 33A of the Planning and Compulsory Purchase Act 2004, as amended, places a legal duty upon local authorities and other public bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation, this is known as the 'Duty to Cooperate' on strategic matters of cross-boundary significance, which includes housing supply. Before a Planning Inspector can begin the process of examining a Local Plan, they need to be satisfied, with the Council's evidence, that the local authority has demonstrated it has done everything it can to ensure effective cooperation with neighbouring authorities and other partner organisations and has sought to resolve, as far as is possible, any cross-boundary planning issues.
- 2.3 Part 1 and Part 2 of the Local Plan have been published for consultation pursuant to Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Local Plan is subject to a statutory six week public consultation period and the Sustainability Appraisals five weeks; however, the consultations were extended to accommodate additional time for anyone taking summer holidays.

3. Alternative Options

- 3.1 Members could seek further information or could choose to proceed in a different way in relation to specific policies. The alternative of not proceeding with a new Local Plan would leave the Council in a vulnerable

position going forward with no clear steer for the future growth and development of the Borough. It would result in existing policy becoming outdated and not in accordance with national policy requirements. There could also be issues under the Duty to Co-operate requirement.

4. Supporting Information

- 4.1 Work on the Council's new Local Plan began in 2014 and involved consultation on an initial Issues and Options consultation in January/February 2015. Since then, the Committee has received reports in June and August 2015 noting the results of the Issues and Options consultation and providing progress on the development of the plan and its supporting evidence base. During this period, the Council also invited landowners and developers to put forward potential sites for development which the Council has then assessed for suitability.
- 4.2 The December 2015 Committee approved an updated Local Development Scheme which set forth the timetable for Local Plan development. This was subsequently amended at the last meeting in August. The April 2016 Committee considered selected draft development management policies which were incorporated into the full version of a Preferred Options plan, containing both allocations and policies.
- 4.3 In July this year the committee considered the full Preferred Options Local Plan and agreed public consultation over an extended ten week period.
- 4.4 Consultation on the Preferred Options document was carried out from 9 July to 16 September 2016. The consultation process involved publishing the document and supporting information on the website; notification of the consultation to the Council's extensive list of interested organisations and individuals; and a series of public drop-in sessions which were advertised through social media, press coverage, and posters circulated to parish councils.
- 4.5 At the drop-in sessions, attendees were provided with background information on the Local Plan process; copies of the consultation document; opportunities to ask questions of the officers in attendance; and information on how to respond more formally to the consultation, including advice on using the consultation portal.
- 4.6 The consultation attracted an all-time high number of responses totalling 3102 representations from 1539 respondents. This compares to a total of 649 responses from individuals and organisations at the Issues and Options stage in 2015.
- 4.7 Of the total numbers, approximately 62.2% were received by people using the on-line consultation portal. This is a vast improvement on previous years where the percentage of people using the online surveys was as low as 10%. It did still mean that of the remaining 37.8%; 27.5%

emailed and 10.2% wrote in, which meant they had to be put in manually. This was a very resource intensive process.

- 4.8 At the last meeting in November, Members were asked to note the representations received but at that time it was not possible to provide a comprehensive draft response. The representations have now been analysed by officers within the Spatial Policy Team and other departments in the Council. External organisations such as Essex County Council and Essex Wildlife Trust have also been contacted where there are specific issues. Because Part 1 of the Plan is a joint plan and includes cross boundary sites, the responses on this part are currently confined to comments on the two Garden Communities entailing allocations within Colchester. Further comments which await joint finalisation with Tendring and Braintree will be tabled at the meeting in the form of the 3 Councils' response to the Campaign Against Urban Sprawl in Essex (CAUSE) comments on Part 1.
- 4.9 While the analysis was being undertaken the evidence base was also being developed and has helped inform some of the changes proposed to the Plan. The tables in Appendix 1 provides a summary of the number of responses received on each part of the plan along with a summary of the key issues raised. Due to the number of responses received it is not possible to include every one verbatim or in detail but Members can view each one in full using the Local Plan software and following the link below;
<http://colchester.jdi-consult.net/localplan/readdoc.php?docid=3>
- 4.10 Any proposed changes to the Preferred Options Local Plan to create the Submission version of the Local Plan will be presented to the next meeting of this Committee on February 7th 2017.

5. Proposals

- 5.1 The Local Plan Committee is asked to review the representations submitted and the proposed officer response on each to help inform the Full Submission version of the Draft Local Plan which will be presented to Members at the February meeting.

6. Strategic Plan References

- 6.1 Effective strategic planning supports the Strategic Plan Action Plan which includes a commitment to make Colchester a vibrant, prosperous, thriving and welcoming place.

7. Consultation and Publicity

- 7.1 Consultation was undertaken as detailed above.

8. Financial Implications

- 8.1 N/A.

9. Equality, Diversity and Human Rights Implications

- 9.1 An Equality Impact Assessment has been prepared for the Local Plan and is available to view by clicking on this link:-

<http://www.colchester.gov.uk/article/4962/Strategic-Policy-and-Regeneration>

or go to the Colchester Borough Council website

www.colchester.gov.uk and follow the pathway from the homepage: Council and Democracy > Policies, Strategies and Performance > Equality and Diversity > Equality Impact Assessments > Strategic Policy and Regeneration and select Local Development Framework from the Strategic Planning and Research section.

- 9.2 There are no particular Human Rights implications.

10. Community Safety Implications

- 10.1 None

11. Health and Safety Implications

- 11.1 None

12. Risk Management Implications

- 12.1 N/A.

13. Disclaimer

- 13.1 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 omission.

Appendix 1a Summary of representations to non-site specific policies

| POLICY | Total Reps | Key Issues raised in Representations |
|---|------------|---|
| Sustainable Settlements | | |
| Local Characteristics | 8 | <ul style="list-style-type: none"> • Support for sustainable land use patterns, delivery of economic growth, supporting town centre & improving accessibility • Support approach regarding climate change and focusing development at sustainable locations • Braintree DC supports aims & objectives • Essex County Council suggest minor changes to text • Homes should be built to lifetime homes standards • Larger employers should be encouraged to locate in Colchester • Transportation links on the A12/ A120 are problematic |
| Vision | 21 | <ul style="list-style-type: none"> • Support vision to maintain a good housing delivery rate • A Transport Plan is required • There is no analysis as to the sectors within which continuing and important job growth are likely to be focused within • There is no specific mention of working with the health sectors & health and wellbeing of residents • Welcome identification of protecting environment, good design & streetscapes • Need a clear vision for the town centre • Green infrastructure is needed for all users • University welcomes recognition in the plan. Land for expansion is needed |
| Objectives | 12 | <ul style="list-style-type: none"> • Support for environmental objectives • Actions need to live up to sentiments expressed • No specific mention of working with stakeholders such as health • High quality and accessible leisure facilities should be listed • Green infrastructure is needed for all users |
| CBC response: Comments are generally supportive and noted. Some detailed changes will be made to wording to reflect points made. | | |

| POLICY | Total Reps | Key Issues raised in Representations |
|------------------------------------|-----------------------|---|
| The Spatial Strategy | 6 | <ul style="list-style-type: none"> • Highly sustainable needs better definition • Uncertainty on number and location of Stanway dwellings • Spatial strategy must be informed by flood risk sequential test and exceptions tests • Proposals maps and key diagram should be better labelled |
| Spatial Strategy Policy | 3 | <ul style="list-style-type: none"> • Pleased to see flood risk was assessed • Land should be allocated for housing in Tiptree • Sites within the town centre should be developed as a priority |
| Sustainable Settlements | 4 | <ul style="list-style-type: none"> • Strict criteria in paragraph 4.20 penalises the assessment of rural communities • The Local Plan does not support sustainable development – comments about West Tey |
| SG1: Colchester's Spatial Strategy | 32 | <ul style="list-style-type: none"> • Support for the allocation of numerous towns/ villages as district centres/ sustainable settlements • New development can maintain and improve the sustainability of existing settlements • West Tey is highly accessible but unsustainable in the long term • Spatial strategy will reduce the need to travel • Middlewick Ranges site is immediately available adjacent to the built up area of Colchester • Sites within 250m of safeguarded operational or permitted minerals and/or waste developments need reference to specific requirements • Colchester road network is largely at capacity particularly at peak periods • The spatial strategy is based on the premise that it is necessary to categorise rural settlements as unsustainable |
| Table SG1 | 10 | <ul style="list-style-type: none"> • Agricultural and public land is precious • Table fails to differentiate between district centres and sustainable settlements • Great Tey does not fulfil the criteria set in 4.20 |
| 4.25 Alternative Spatial Strategy | 3 | <ul style="list-style-type: none"> • Possibilities for Middlewick Ranges should be explored as an alternative to garden communities |

| POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|---|
| | | <ul style="list-style-type: none"> • Council should have an open debate about an alternative spatial strategy |
| CBC Response: Comments are noted. The comments are varied and many also relate to issues which appear in other sections of the plan. There will be some consequential changes to the Spatial Strategy and relevant sections of the Plan to reflect other changes made elsewhere in the Plan. | | |
| SG2: Housing Delivery | 33 | <ul style="list-style-type: none"> • Support proposal to deliver 920 dwellings per annum • Plan must have a larger buffer than 240 units, this amounts to 2%. Buffer should be closer to 20% • Greater emphasis should be given to satellite villages surrounding Colchester • Uncertainty on number and location of Stanway dwellings • Smaller greenfield sites can make an important contribution to strategic housing numbers • Strategy should not be overly reliant on large strategic sites • Council should consider increasing the allocations in its sustainable settlements as a contingency • Council should not hold back development of sites to the east and west at the expense of the garden communities • An initial phase of development for the West garden community should be allocated • Clarity sought on the relationship between part 1 and part 2 • Balance the demand for housing with the desire to retain important areas for nature • Colchester's infrastructure isn't coping already • Omitting other villages does not reflect the spatial strategy or spatial hierarchy |
| Table SG2 | 12 | <ul style="list-style-type: none"> • There is a lack of justification of housing figures • Housing numbers should be maximum for Wivenhoe • Support housing in existing settlements • East garden community should be deleted • Support for a number of housing allocations • Table 2 should make it clear that Marks Tey is identified for development |

| POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|--|
| | | <ul style="list-style-type: none"> The Council should review the approach to the delivery of additional housing beyond the numbers agreed in part 1 Demonstrate that infrastructure can support new housing |
| 4.32: Alternative Options Considered | 3 | <ul style="list-style-type: none"> The Council has not properly consulted on the size or location of the alternative options or why they were dismissed |
| <p>CBC Response: Housing numbers reflect approach set out in NPPF. A 5% buffer is required for the first five years only brought forward from later in the plan period. The Submission Plan will clearly identify sites in Stanway and will provide boundaries for the Garden Communities to the east and west. An Infrastructure Delivery Plan is being prepared and will inform final allocations. The strategy is based on a number of sites varying in size and location in accordance with the NPPF. There is a comprehensive evidence base for the housing targets (SHMA, OAN).</p> | | |
| Economic Delivery Policies | 1 | <ul style="list-style-type: none"> Concerned about recent ruling on Stane Park, which said Colchester had too much land earmarked for employment |
| Strategic Economic Areas | 1 | <ul style="list-style-type: none"> Support, especially the University |
| Centres Hierarchy | 2 | <ul style="list-style-type: none"> The new Sainsburys store should be designated as a district or local centre Existing centres should be reinstated |
| SG3: Economic Growth Provision & Centre Hierarchy | 17 | <ul style="list-style-type: none"> Policy requirement for at least 55.2ha of B Class land is not sound Plan does not consider how the full spectrum of job creation will be managed and delivered It is vital that primary care workforce planning and need is full considered Town centre uses in existing centres should be proportionate to the role and function of that centre in the hierarchy Strategic economic area of Northern Gateway and Severalls Business Park is vital The Rowhedge Business Centre would make a preferable site for mixed use residential and community use The exclusion of urban district centres from the hierarchy is not justified & is contrary to NPPF para 23 |

| POLICY | Total Reps | Key Issues raised in Representations |
|---|------------|--|
| | | <ul style="list-style-type: none"> Tower Business Park should not be allocated for employment Road infrastructure in the east of Colchester has to be significantly improved |
| Table SG3 | 1 | <ul style="list-style-type: none"> Colchester Institute pledge their support through the supply of a local workforce with the necessary construction and engineering skills |
| <p>CBC Response: This section of the Plan is likely to generate the most changes as a result of comments received during the consultation and new evidence that has been commissioned. It is proposed that a retail hierarchy will be reinstated based predominantly on the existing urban and rural district centres. An employment land trajectory is being prepared and there will be a rationalisation of employment land to ensure the best sites are retained to encourage inward investment and support existing business expansion for the duration of the plan i.e. 15 years.</p> | | |
| Local Economic Areas | 1 | <ul style="list-style-type: none"> Clarity needed |
| SG4: Local Economic Areas | 11 | <ul style="list-style-type: none"> IDP should cover emerging developments Flexibility is sensible Rowhedge Business Park should be allocated for mixed use housing and community use Need to check for consistency White Lodge Road & Oak Farm, Layer Marney and Poplar Nurseries, Marks Tey should be allocated as a local employment area |
| Table SG4 | 3 | <ul style="list-style-type: none"> Oak Farm, Layer Marney and Poplar Nurseries, Marks Tey should be allocated as a local employment area Whitehall local employment area boundary should be amended |
| <p>CBC Response: A response to specific site proposals is included in the relevant place policy. The policy is worded to provide a balance between flexibility and safeguarding Local Employment areas. The IDP will include infrastructure requirements arising from employment sites.</p> | | |
| Existing Mixed Use Commercial Areas within Colchester | 3 | <ul style="list-style-type: none"> More areas are needed if traffic congestion is to be reduced Sustainable transport links between the Cowdray Centre and Turner Rise should be considered |

| POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|---|
| SG5: Existing Mixed Use Commercial Areas within Colchester | 6 | <ul style="list-style-type: none"> Increases in out of town retail areas would be inappropriate The exclusion of urban district centres from the hierarchy is not justified. A new bespoke policy wording for the UDCs similar to existing policy BE2b should replace policy SG5 Sustainable transport links between the Cowdray Centre and Turner Rise should be considered Policy does not allow for flexibility contrary to NPPF paragraph 22 Object to identification of land north/south of Tollgate West for B class use Object to removal of Tollgate UDC, no evidence is provided as to the definition of a district centre |
| <p>CBC Response: As noted above a retail hierarchy will be reinstated but it will make clear that Colchester Town Centre is at the top of the hierarchy. There are walking and cycling links between the Cowdray Centre and Turner Rise. Provision has been made within the planning permission for the Cowdray centre to safeguard land for a future road link. This will be clarified in the policy. The policy is considered to be flexible but land does need to be retained for the whole plan period. Rationalisation exercise will take place.</p> | | |
| Strategic Infrastructure Policy | 3 | <ul style="list-style-type: none"> There is no IDP |
| SG6: Strategic Infrastructure | 18 | <ul style="list-style-type: none"> Infrastructure is essential before garden communities can deliver Welcome consideration of flood risk management Timescales needed for when input to the IDP will be Policy does not recognise the limitations on the ability to pool contributions via s106 nor the role that CIL will have in the delivery of infrastructure Policy suggests an infrastructure first policy, which is beyond the remit of the development industry. Policies SG6 & SG8 should be merged Policies should not have an adverse impact on healthcare provision SP4, SP8 & SP10 do not provide guidance or reassurance about how strategic infrastructure delivery will be co-ordinated |

| POLICY | Total Reps | Key Issues raised in Representations |
|---|------------|---|
| | | <ul style="list-style-type: none"> Air quality must be included in the policy |
| CBC Response: An Infrastructure Plan is being developed to be published alongside the Submission version of the Local Plan. Essex County Council's suggestion to merge the infrastructure policy with the developer contribution policy is considered to add clarity and wording for a comprehensive policy highlighting the need for development to contribute to necessary infrastructure will accordingly be recommended. | | |
| Neighbourhood Plan | 2 | <ul style="list-style-type: none"> Environment Agency would welcome the opportunity to assist the LPA in providing advice to neighbourhood planning groups Evidence base should include SFRA, SWMP and Flood Mapping where appropriate |
| SG7: Neighbourhood Plans | 12 | <ul style="list-style-type: none"> Local Plan should ensure policies are in place to deliver housing in the event that a neighbourhood plan does not materialise Neighbourhood plans should be required to demonstrate how the strategic objectives regarding meeting housing needs will be identified Neighbourhood plan timetables should be published Marks Tey should provide some housing Tiptree is omitted from policy University concerned that the neighbourhood plan and Local Plan allocate different areas of land for university expansion |
| CBC Response: Minor rewording will ensure points of concern or conflict are clarified | | |
| Developer Contributions | 1 | <ul style="list-style-type: none"> There should be a proactive policy to spend developer contributions |
| SG8: Developer Contributions and Community Infrastructure Levy | 15 | <ul style="list-style-type: none"> Environment Agency welcome the opportunity to contribute to CIL and developer contribution considerations There should be a policy that indicates a supportive approach from the LPA towards the improvement, reconfiguration, extension or relocation of existing medical facilities Existing healthcare infrastructure requires further investment |

| POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|--|
| | | <ul style="list-style-type: none"> • Policy should include provision for developer contributions to a strategic mitigation package for recreational disturbance impacts on Natura 2000 sites • The CIL consultation of £150sqm was too high, Colchester should engage with developers • New development will not always give rise to the need for many new or improved services • Policies SG6 & SG8 should be merged • This does not address lack of infrastructure from past developments, long term view is needed |
| <p>CBC Response: An Infrastructure Plan is being developed to be published alongside the Submission version of the Local Plan. The Council has engaged with developers regarding CIL and put it on hold because of viability concerns. Healthcare is a key issue and officers are continuing to engage. Policy cannot address existing deficits – this is clear in national policy. Essex County Council's suggestion to merge the infrastructure policy with the developer contribution policy is considered to add clarity and wording for a comprehensive policy highlighting the need for development to contribute to necessary infrastructure will accordingly be recommended.</p> | | |
| Environment | | |
| Natural Environment | 9 | <ul style="list-style-type: none"> • Reference should be made to enhancing and improving the natural environment • What evidence has been used to identify vulnerable species and necessary corridors? How will developers contribute to such measures • Rewording suggested to reflect protection afforded to internationally designated sites |
| ENV1: Natural Environment | 27 | <ul style="list-style-type: none"> • Existing wildlife areas need suitable protection • Rewording suggested to reflect protection afforded to internationally designated sites • Policy should be renamed to refer to historic environment • Policy should recognise that brownfield sites can be important for biodiversity • Plan is silent on agriculture • A Habitats Regulations Assessment is required |

| POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|--|
| | | <ul style="list-style-type: none"> Land south of West Bergholt should be designated as an Area of Special Landscape Various minor amendments suggested |
| CBC Response: Comments noted on need to protect natural environment. Policy amendments needed for compliance with NPPF and to strengthen policy in relation to Natura sites, protected species, brownfield sites. Impact of development on agriculture/soils is considered through the Sustainability Appraisal process. Further consideration needed about the need to strengthen policy in relation to agriculture/soils. A Habitats Screening Report has been prepared and an Appropriate Assessment is under development. Local sites to be added to Proposals Map. | | |
| Coastal Areas | 6 | <ul style="list-style-type: none"> Various minor amendments suggested Council should resist the erection of a new Nuclear Power Station at Bradwell |
| ENV2: Coastal Areas | 8 | <ul style="list-style-type: none"> Various minor amendments suggested Council should resist the erection of a new Nuclear Power Station at Bradwell No map is provided for the proposed update of the coastal protection belt Potential for development adjoining the built up areas of the coast |
| CBC Response: The revised Coastal Protection Belt will be shown on the final Proposals Map. A Habitats Regulations Assessment Screening Report has been prepared and work is underway on an Appropriate Assessment for the Local Plan. Minor policy amendments will be made to reflect changes sought by Environment Agency. | | |
| Green Infrastructure | 4 | <ul style="list-style-type: none"> Needs of horse riders should be included More information is needed on the Colchester Orbital and the map is out of date |
| ENV3: Green Infrastructure | 19 | <ul style="list-style-type: none"> Refer to water bodies Need to include existing wildlife areas Green infrastructure has the potential to mitigate recreational pressure on designated sites Colchester Orbital does not recognise the other functions of green infrastructure Unclear what the Council is seeking to achieve through the policy Multi user off road rights of way are needed in Colchester |

| POLICY | Total Reps | Key Issues raised in Representations |
|--|------------|---|
| | | <ul style="list-style-type: none"> Colchester Orbital should include the longer term vision of an outer orbital Too vague and caveat ridden |
| CBC Response: Policy to be amended to reflect the multi-functional benefits developed by green infrastructure including its role in relieving pressure on Natura 2000 sites. A topic paper on the Orbital Route will be added to the Local Plan evidence base. The Orbital map will be reviewed for accuracy. | | |
| ENV4: Dedham Vale AONB | 11 | <ul style="list-style-type: none"> Small amendment to policy suggested by AONB group Major proposals within AONB will require a Landscape Visual Assessment Dedham Vale would benefit from more new housing Protected lanes is missed from the policy/ Plan Guidance on minimising light pollution would benefit the AONB Council should underground all infrastructure associated with offshore delivery schemes |
| CBC Response: Minor rewording will take place to reflect comments made. Housing development within the Dedham Vale will be permitted subject to complying with other relevant policies on rural exception sites. | | |
| Climate Change | 7 | <ul style="list-style-type: none"> Various minor amendments suggested Greater emphasis should be given to the development and preservation of water resources |
| CC1: Climate Change | 13 | <ul style="list-style-type: none"> Include reference to flood risk Policy should not go beyond the standards for energy efficiency set within Building Regulations Green infrastructure should be included List of measures should reflect the energy hierarchy Local Plan falls short of addressing climate change and sustainability issues Need to insist on low carbon technologies being fitted where available This section should mention the impact of the larger A12/A120 and consequent increased congestion |

| POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|---|
| 5.47 Alternative Policy Options | 1 | <ul style="list-style-type: none"> The Council has a statutory duty to monitor air pollution |
| CBC Response: Minor wording changes will take place to ensure the policy is comprehensive and deliverable, but at the same time does not repeat other guidance / statutory requirements. | | |

Appendix 1b Representations on Place Policies and Allocations – Key Issues

(Note this summary is of the key issues only to provide an overview in relation to the Place Policies in the referred Options Local Plan. (Full representations will be analysed when considering responses and amendments required to the Plan.)

Note: numbers may vary from the table in the report because representations relating to supporting paragraphs have been included along with representations about related policies.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|--|--|
| East Colchester Garden Community | | |
| Policy SP8: East Colchester/West Tendring New Garden Community | 101 Plus a petition with 733 signatures | <ul style="list-style-type: none"> • Protect Salary Brook area, hillside overlooking Salary Brook Valley. Concern over impact on ecological assets including wildlife. Natural History Society would prefer Salary Brook contained within wider nature reserve rather than country park to protect site's integrity. Inclusion of Churn Wood in GI network welcomed. Open countryside east of Greenstead should be retained as far as the eye can see. • Development would be in Tendring but would rely on infrastructure paid for by Colchester residents. • Direct development elsewhere. Alternative proposals include brownfield sites in East Colchester urban area; Weeley new town; and deprived towns like Clacton and Harwich where infrastructure can support development. • A120/133 link road should be constructed and transit link operational before new dwellings occupied. Local roads improved before development. Cycle path improvements; a new part and ride scheme; and dedicated bus lanes needed along with equestrian access. • Development would overload infrastructure, including roads, schools, healthcare and sewage. Traffic congestion already bad, particularly on |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|----------------------------|---------------|--|
| | | <p>Clingoe Hill. Facilities already under pressure including local primaries, surgeries and Colne Community School/Colchester secondary schools. . Infrastructure in place before building commences. Commitment from partner organisations needed.</p> <ul style="list-style-type: none"> • Extra burden of traffic through Wivenhoe of commuters using railway station. • Impacts on waste water treatment, flood management. • Loss of top grade agricultural land. • Preferred option needs further work to reassure local residents that it can deliver improved quality of life for both existing and new residents. • Social housing provision needed. • Concerns over proximity with Greenstead and Longridge. Buffer zone needed as proposed for Elmstead Market. Development should be over brow of Salary Brook hill so it is out of sight of existing residents. • Noise from development will affect existing residents. • Objects to development, but if built then 15 pitch Gypsy and Traveller site should be included. • Environment Agency –Support high proportion of green infrastructure for area found in plan. Advise that the outer boundary of new Salary Brook country park should be commensurate with the outer boundary of Flood Zone 2 to avoid development in flood risk areas. • RSPB - Specific protection for protection and enhancement of biodiversity assets required. • Historic England – difficult to comment on impact without knowing boundaries. • ECC – New 2 form entry primary school required in early phases; second new 2 forms of entry later in plan period, plus potential expansion of existing primary to account for additional east Colchester growth. New 4 form secondary school needed for early phases |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|--|---|
| | | <p>followed by expansion to accommodate 9-12 forms. Full package of transport measure to be developed through masterplan framework. Strategic link road needed between A120 and A133.</p> <ul style="list-style-type: none"> University – objects to deletion of land allocated for future campus expansion to the southwest unless alternative allocation made in Colchester or Tendring plan. |
| <p>CBC Response: Concept Frameworks are being developed which will inform the Submission version of the Plan which will define boundaries and more detailed masterplan DPDs which will follow. There is an intention to include a large area of strategic open space around Salary Brook</p> <p>There is also an intention to incorporate expansion of the University within the Garden Community and this is seen as preferable to the existing site allocated south of Boundary Road which is within a flood plain and incorporates a Local Wildlife Site.</p> <p>Comments are noted about gypsy and travellers and those from RSPB, ECC, Environment Agency, and Historic England.</p> <p>Infrastructure and affordable housing will be provided as part of future development and the timing of delivery is a critical part of creating new communities.</p> | | |
| West Colchester New Garden Community | | |
| Policy SP9: West Colchester/East Braintree New Garden Community | <p>259</p> <p>Plus a Petition from CAUSE– 8,482 signatures</p> | <ul style="list-style-type: none"> Will create urban sprawl of Colchester, destroy rural character. New residents will be London commuters, but rail is inadequate. Infrastructure already inadequate – roads, rail, schools, hospital all not able to support high levels of new growth. No new housing until infrastructure built, including roads – A12 tripled, A120 dualled; dedicated bus routes; station properly connected to community; funding for rail capacity increases, school and health facilities provided. Loss of agricultural land. |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|----------------------------|---------------|--|
| | | <ul style="list-style-type: none"> • Questions about economic viability given lack of established employment generators. Risk of commuter community. Need early investment in employment. • Garden Communities can't be guaranteed to be accepted and in place within timeframe – transport infrastructure delivery will take time. • Make clear that delivery vehicle will be responsible for master planning. • Development is too big. • Increase in pollution, noise and fumes. • Use sites in existing built up areas. • No Infrastructure Delivery Plan or full transport modelling to accompany proposal. • Increased likelihood of flooding. • Any new town should have its own centre and identity. • Lack of evidence for town of this size at this time. Housing numbers lack credibility. • North Essex authorities lack experience, expertise and resources to implement Garden Communities. • Environment Agency – supportive of policy. Foul drainage capacity will need to be upgraded. • RSPB – sections on masterplanning should specify that green infrastructure provision should be described. Need to secure management of biodiversity assets. • Historic England – difficult to comment on impact without seeing boundaries of what is proposed. • ECC – New primary required in early phases of development, second primary later in plan period. Some expansion of Honywood School and Thurstable School possible, but new secondary school needed before |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|------------|--|
| | | end of plan period. Full package of transport measure need to be developed through masterplan framework. |
| <p>CBC Response: Concept Frameworks are being developed which will inform the Submission version of the Plan which will define boundaries and more detailed masterplan DPDs which will follow. All these documents are underpinned by the principle that infrastructure and affordable housing is to be provided as part of future development and the acknowledgement that timing of delivery is a critical part of creating new communities.</p> <p>Comments are noted from RSPB, ECC, Environment Agency, and Historic England.</p> <p>Consultation expected to start in January on proposals for the A120 and A12.</p> <p>The CAUSE Representation is being dealt with separately.</p> | | |
| CENTRAL COLCHESTER: TOWN CENTRE | 7 | <ul style="list-style-type: none"> • Ensure consideration given to flood risk issues reflected in the Surface Water management Plan – discuss with ECC as the LLFA • Differentiate between evening and night time economy • Support continued commitment to the town centre • Concerns about student accommodation • Welcome regeneration but seek to safeguard Sainsbury's in Priory Walk • Support threshold for retail impact assessment, but question requirement for RIA in centre outside of Town Centre • Alternative sliding scale for requirements retail impact assessments suggested for district and local centres • Floorspace requirements outside of town centre are not justified • Support the hierarchy with Town centre at the top and the 3 rural district centres. Reserve position in respect of Garden Communities |
| Policy TC1: Town Centre Policy and Hierarchy | 20 | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|------------|---|
| | | <p>and centre designation. Welcome a change in respect of Urban district centres</p> <ul style="list-style-type: none"> • New Sainsbury's at the Hythe should be a new district centre • Support role of the town centre as a cultural hub • Reference to Jumbo / Balkerne Gate and its importance and public realm should be included in the Plan and afforded some priority |
| CBC Response General points noted, with some rewording of the policy to be recommended to mention in particular role of evening economy; clarify that the 500 sqm threshold applies to District Centres in Tiptree, West Mersea and Wivenhoe and reinstate Tollgate, Peartree Road, Highwoods and Turner Rise as Urban District Centres to reflect the recommendations of the Retail Study update (to be published to inform the Submission Local Plan). | | |
| Policy TC2: Retail Frontages | 6 | <ul style="list-style-type: none"> • Approach supported but justification required • Map / key to better reflect Policy reference • Support bringing sentiments of Better Town Centre SPD to fore. Mention of safeguarding enhancing key heritage assets should be added eg St Botolph's Priory/ Roman Wall |
| CBC Response Revisions to the Primary and Shopping area frontages will be recommended to reflect the recommendations of the Retail Study update (to be published to inform the Submission Local Plan) Heritage assets are protected by other policies. | | |
| Policy TC3: Town Centre Allocations | 17 | <ul style="list-style-type: none"> • Plan does not set out justification for meeting the floorspace requirements • No sequential test has been carried out to accommodate this floorspace need for retail uses • Sequential test should include existing District Centres including Tollgate Village • Reference to key heritage assets should be made in these allocation policies |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|------------|--|
| | | <ul style="list-style-type: none"> • Objections to Housing allocation at Britannia Car Park- Loss of car park space and impact on traffic, and use for the school and church • University accommodation to be provided closer to the Campus rather than within Town Centre area |
| CBC Response: The Plan is considered to identify adequate floorspace to accommodate projected capacity requirements, and these are in sequentially preferable locations. The Council will publish an updated Retail Study to inform the submission version of the plan which will update capacity figures but will not identify the need to allocate further land for town centre uses in the absence of demand. | | |
| NORTH COLCHESTER | 9 | Note comments overlap in respect of various elements of Policy NC1 (eg Comments on Housing allocation at the Rugby Club are not just confined only to this element. <ul style="list-style-type: none"> • Detailed suggestions for reconfiguration of the land within the 3 zones; • Inclusion of additional areas of land within the SEA including land to the north and south of the traveller site and land around Cuckoo farm Studios • Detailed policy wording amendments proposed regarding uses permitted; • Inconsistent approach with other Strategic Economic Areas in particular Stanway; • Support additional community facilities in relation to need –reference identified need for a place of Worship in this area which could be accommodated as part of community provision • Other uses should be specified in the policy for zone 2 • Concern about infrastructure capacity including A12 from traffic generated by uses associated with policy |
| Policy NC1: North Colchester and Severalls Strategic Economic Area | 20 | |
| <ul style="list-style-type: none"> • Zone 1 - Strategic Employment Area | 1 | |
| <ul style="list-style-type: none"> • Zone 2 - Cuckoo Farm North West | 1 | |
| <ul style="list-style-type: none"> • Zone 3 - Northern Gateway area north of the A12 | 5 | |
| <ul style="list-style-type: none"> • Land at the Rugby Club | 2 | <ul style="list-style-type: none"> • No residential provision on this site • Loss of open space |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|---|
| | | <ul style="list-style-type: none"> • Loss of sports field and the lack of local facilities for local sport, displacing sports including American Football, Cricket and Rugby League; • Rugby Club receiving preferential treatment to other sporting activities / local clubs • Sports provision proposed as part of Northern Gateway Strategic Proposals is insufficient to meet the growing needs; • Number of houses should be increased to 300 allowing for higher density and higher rise development; • Additional / alternative sites proposed on land including; <ul style="list-style-type: none"> ○ Proposal for extra care retirement village to provide 250 mixed tenure extra care units within Policy Area NC1 (no site definition specified) (in addition to other housing allocated within this policy area ○ Land at Oxley Parker Drive (area of open public open space) ○ Land At Axial Way -reinforcement of current planning position (retention of site for housing) |
| <p>CBC Response: Some rewording and reconfiguration of the Strategic Employment area will be recommended, with the retention of equivalent land areas to ensure adequate provision for employment. Minor policy wording changes will be made to provide clarity and ensure sufficient flexibility.</p> <p>An increase in the housing number to 500 at the Rugby club site will be recommended to also include provision for an extra care housing facility for 250 units.</p> <p>Mapping changes will be made to reflect reconfiguration and ensure consistency with the Myland and Braiswick Neighbourhood Plan.</p> | | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|--|
| Allocation of the site promoted at Oxley Parker Drive is not supported for allocation for housing since it is currently open space which will continue to be protected for its amenity value serving the adjoining residential area. | | |
| Other comments are noted. | | |
| Policy NC2: North Station Special Policy Area | 8 | <ul style="list-style-type: none"> • No consideration is given to fluvial or surface water flooding; • The sequential test must be applied for all sources of flooding; • The area encompasses a Critical Drainage Area; • Turner Rise should be incorporated within the boundary of the policy area; • Traffic problems at North Station will get worse as more homes are built; • Direct and rapid transport links to North Station are required from other parts of the town; in particular the East, including the University; • One of the key radial links on the Colchester Orbital is via Castle Park and through High Woods; • A designated bus for the town centre from the station ticket office is required. |
| CBC Response: The comments are noted. The flooding and drainage issues are covered by other Policies and there is no need for duplication here. Minor wording changes will reflect any amendments to other policies where relevant. Rapid Transport links between the East and West of Colchester are being investigated. No need for significant change to the policy. | | |
| Policy NC3: North Colchester | 27 | <ul style="list-style-type: none"> • Infrastructure capacity • Capacity of B1508 • Impact on North Station Junction; • Not able to absorb this as well as Chesterwell development (1600) • Contrary to the M&B NHP |
| <ul style="list-style-type: none"> • Residential Allocations | 3 | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|--|
| | | <ul style="list-style-type: none"> • Highways England- objection to any development to the North of Colchester • Support for sites from the site promoters • Alternative sites proposed on land including; <ul style="list-style-type: none"> ○ Land at Bakers Lane Land east of Bakers Lane 7.53 ha plus land west of Bakers Lane 1.29 ha (adjacent to ramparts farm. ○ Further land at Bakers Lane- 1.95 ha. ○ Land at St John's Road (39 ha) |
| <ul style="list-style-type: none"> • Land At St Botolph's Farm Braiswick | 15 | <ul style="list-style-type: none"> • Loss of green space • Detrimental Impact on wildlife • Reduces separation between Colchester and W Bergholt (coalescence) • Access within the 60 mile per hour section of Road • Suggested that Site falls within EH protected land Moat Farm National Monument 1019964 • Site unsuitable as subject to subsidence; • Flood risk on part of site |
| <ul style="list-style-type: none"> • Land north of Achnacone Drive Braiswick | 31* | <ul style="list-style-type: none"> • Impact on Amenity of area • Detrimental effect on character of residential area • Safety for users of Achnacone Drive • Road too narrow – not suited to increase or construction traffic • Suggested that Site falls within EH protected land Moat Farm National Monument 1019964 |
| <ul style="list-style-type: none"> • Land south of Braiswick Golf Club | 18* | <ul style="list-style-type: none"> • Poor access to site • Narrow access – difficult for service vehicles; • Backland development • Detrimental to amenity of existing residents |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|--|
| | | <ul style="list-style-type: none"> • Over development • Loss of trees |
| CBC Response <p>The points raised regarding local traffic concerns are noted and access to the sites will be designed with the Highway Authority to ensure adequate capacity exists and safe vehicle and pedestrian access is provided.</p> <p>It will be recommended that the allocation on Land South of Braiswick- Golf Club be removed from the plan. Further investigation has identified concerns in respect of achieving an acceptable access and the site promoter has submitted information to indicate that the site is no longer available within the forthcoming Plan period.</p> <p>The allocations for development on sites at Achnacone Drive and St Botolph's Farm are recommended to be retained with further consideration given to policy wording to reflect adequate protection of relevant site constraints and safeguard existing residential amenity.</p> <p>The alternative sites off Baker's Lane are not considered appropriate for allocation with key constraints linked to the proximity to Moat Farm Dyke which is classified as an Area of High Archaeological Potential and a Scheduled Monument by Historic England because of its significance to Iron Age settlement defences. In addition the Highway Authority has concerns about increasing any access onto Bakers Lane.</p> <p>Further consideration of any recommendations in relation to land at St John's Road Colchester, is linked to the consideration of the proposed Garden Community Development to the East of Colchester.</p> | | |
| EAST COLCHESTER | | |
| Knowledge Gateway and University Strategic Economic Area | 3 | <ul style="list-style-type: none"> • Need to make reference to urgent need for additional housing to match the expected growth at the Knowledge Gateway • Policy should refer to the many heritage assets on the site including Grade ii* listed Wivenhoe House and the Register Park and Garden |
| Policy EC1: Knowledge Gateway and University | 10 | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|--|
| of Essex Strategic Economic Area | | <ul style="list-style-type: none">Environment Agency suggest reference in the policy to the avoidance of development within the flood plain at Salary BrookSimilar allocation should be included in the Tendring Local Plan as largely in TDC area. TDC acknowledge joint working and further discussion regarding boundaryTDC also raise concern regarding any additional housing in the east of Colchester over and above that as part of the Garden CommunitySupport for the recognition and importance of University and its contribution to growth and in particular incubator unitsRemember expansion allocation comes with the expectation for the deallocation of land to the south for university expansion |
| <ul style="list-style-type: none">Zone 1 Knowledge Gateway | 1 | |
| <ul style="list-style-type: none">Zone 2 University Expansion | 1 | |
| CBC Response: The comments are noted, but no significant changes to policy will be recommended other than to remove designation on Proposals Map of University expansion land lying within Tendring jurisdiction, although there is continued support for its retention in the Tendring Local Plan | | |
| East Colchester/Hythe Special Policy Area | 4 | <ul style="list-style-type: none">Need to ensure full consideration of flood risk issues in this area with strategic approach between EA / CBC/ AW/ ECC (as the LLFA). EA seek further discussion on Flood risk issues here including ref to DM23 and pragmatic management of flood risk in this areaReference to surcharging of surface sewers to be added to text as this is where infrastructure investment is vital for future regeneration in this areasReference to CIL / Contributions to be levied to support water infrastructurePolicy should be less prescriptive and more flexibleNew Sainsbury’s store should be designated as a new “centre” |
| Policy EC2: East Colchester Hythe Special Policy Area | 9 | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|---|
| | | <ul style="list-style-type: none"> • Regeneration needs to consider biodiversity and also reference should be made to heritage assets as well as environmental assets and refer to opportunities to enhance such assets • Policy should also acknowledge suitability for high rise development and formal sports provision • Particularly important that development proposals are subject to scrutiny and the application of appropriate design and build principles. We would like these sites to be explicitly referred to in the Local Plan • Suggest plan states a desire to support the establishment of properly constituted local groups committed to driving appropriate development - such as CLTs. • Suggest mention of a desire to help identify assets suitable for community ownership/and or management (with due regard to the effect this might have on affordability/viability). • Hythe Forward would appreciate the opportunity for further dialogue and trust that our submission reflects shared strategic objectives of Colchester Borough Council and Hythe Forward CLT |
| <p>CBC Response: The policy wording will need to be amended regarding flood risk management in the Hythe. Discussion will take place between CBC, the Environment Agency, ECC and AW to agree an approach. Greenstead will not be recommended for reinstating as an Urban District Centre as a single supermarket is not considered to fill the role of a District Centre. This consideration also applies to the new Sainsbury's store. Further comments noted, with additional revisions only warranted if not covered by other parts of the Local Plan or guidance elsewhere.</p> | | |
| Policy EC3: East Colchester | 5 | <p>Alternative sites proposed by representations;</p> <ul style="list-style-type: none"> ○ * Place Farm 5.5ha allocated as employment as part of Whitehall Industrial Estate |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|------------|--|
| | | <ul style="list-style-type: none">○ Middlewick Ranges (Rep includes details including reference for up to 2000 dwellings on 84.69 ha) |
| Port Lane | 3* | <ul style="list-style-type: none">• Concern over capacity especially traffic for accumulative delivery of housing with east Colchester / Hythe area. (In view of this is it right to loose Britannia Car park yet?)• Detailed points regarding pavements / parking / gardens and lighting referenced for planning conditions• Limit to 115 dwellings so not overly crammed in |
| East Bay Mill | 4* | <ul style="list-style-type: none">• Correct reference to Exception test – DCLG not Environment Agency• Support reference theme of riverside walks as part of regeneration encouraged |
| Magdalen Street Sites | 5* | <ul style="list-style-type: none">• Concern over capacity especially traffic for accumulative delivery of housing with east Colchester / Hythe area. (In view of this is it right to loose Britannia Car park yet?)• More Almshouses are needed in area for elderly population• Traffic management could include congestion based charge for non-access through traffic Brook St, Magdalen Street and Barrack Street.• Proximity to town centre should mean no requirement for car parking spaces |
| Employment Sites | 2* | <ul style="list-style-type: none">• Support proposals• Area of extension at Whitehall Industrial Estate includes 5.5ha at Place Farm which is not considered viable for employment and should instead in part contribute to Housing Supply which will help deliver employment on remainder (also listed with alternative site above*) |
| <ul style="list-style-type: none">• Local Economic Areas | 1 | |
| <ul style="list-style-type: none">• Whitehall Industrial Estate | 1 | |
| CBC Response: Magdalen Street and Britannia car park will be retained as residential allocations and the policy wording reviewed to ensure appropriateness in light of traffic and car parking management issues within Air Quality Management Area. | | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|--|
| <p>Middlewick Ranges: It will be recommended that land at Middlewick Ranges be allocated for residential development having received new information regarding its availability in the consultation. A new policy will be drafted promoting 1000 residential dwellings at the site. The policy will include mitigation needed to reflect the constraints on this site, principally, ecology and highway capacity and to ensure inclusion of relevant infrastructure to support the allocation. Discussions are on - going with the MOD, Essex Wildlife Trust and Highways Authority which may further influence the allocation.</p> <p>The policy wording will need to be amended regarding flood risk management in East Colchester. Discussion will take place between CBC, the Environment Agency, ECC and AW to agree an approach.</p> <p>Development at Place Farm to be recommended to allow limited housing development off Old Heath Road outside the cordon sanitaire for the sewage works which should help deliver development of an extension to Whitehall Industrial Estate. A policy will be drafted which reflects site constraints including adequate requirements associated with Air Quality Management, ecology and landscape.</p> | | |
| WEST COLCHESTER | 5 | <ul style="list-style-type: none"> Concerns expressed about impact on road infrastructure in particular A12 junction Roads are inadequate and need traffic management Safeguard roman river – protect its history Area incorrectly shown as Public Open Space (part of MOD land) |
| Policy WC1: Stanway Strategic Economic Area | 10 | <ul style="list-style-type: none"> Objections to the removal of Urban District Centre (also comment received supporting the approach proposed in the PO) Approach inconsistent with that of North Colchester Object to safeguarding for b class uses Alternative configuration part of this site and other land with part of Lakelands |
| • Zone 1 | 6 | |
| • Zone 2 | 4 | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|--|------------|--|
| | | <ul style="list-style-type: none"> • Need to consider detailed amenity and place making and adequate infrastructure provision • Reallocate the Trafalgar Farm area as Employment- no longer in Agriculture use |
| <p>CBC Response: The comments are noted. The Urban District centre Allocation will be reinstated. The approach is consistent with that at North Colchester in that no/limited retail is permitted and land is retained for employment use. In response to updated Employment evidence some rationalisation and reconfiguration is likely of the Strategic Economic Area. Residential use of parts of the area will be considered. The map will be amended to reflect any updates and corrections as required.</p> <p>The policy wording, together with other policies in the plan will ensure adequate consideration of relevant constraints and respect amenity and place making considerations as appropriate.</p> <p>It will be recommended that the area of Trafalgar Farm is reallocated as part of the employment area since it has been advised that it is no longer in agricultural use which was the justification for removing this area in the Preferred Options Local Plan.</p> | | |
| Stanway Area Housing/Other Allocations | 3 | <p>Alternative sites promoted via representations;</p> <p>Site Locations:</p> <ul style="list-style-type: none"> ○ Lexden Spring School site and Essex Fire Brigade Workshop site - representations – to include both sites in settlement boundary ○ Land to the South and West of Lakelands- reconfiguration of the Preferred Options allocation for 150 dwellings and employment ○ Additional land at Lakelands (not identified by allocation in the PO) ○ Land north west of 296 London Road 130 dwellings ○ Land between London Road and A12 Stanway 500 dwellings <p>See also sites suggested under WC4 – alternative options</p> |
| Policy WC2: Stanway | 9 | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|--|------------|---|
| <ul style="list-style-type: none"> Land between Church Lane, Churchfields and Partridge Way | 28* | <ul style="list-style-type: none"> Should be retained as open space Status of site in adopted Local Plan- open space Site promoter confirms delivery (Flagship Housing) |
| <ul style="list-style-type: none"> Land at Fiveways Fruit Farm | 6 | <ul style="list-style-type: none"> Need for robust transport plan / strategy Safeguard trees in area and open spaces |
| <ul style="list-style-type: none"> Land at Chitts Hill | 4* | <ul style="list-style-type: none"> Site does not have good access to bus travel; School capacity / infrastructure Question access restrictions and maximum number (promoter) |
| <ul style="list-style-type: none"> Land to the West of Lakelands | 4* | <ul style="list-style-type: none"> Public rights of way Open space Alternative configuration part of this site and other land with part of Lakelands |

CBC Response: The comments relating to the proposed housing allocations are noted. It will be recommended that all of the allocations identified in Stanway in Policy WC2 will be retained. Further consideration will be given to policy wording to reflect adequate protection of relevant site constraints and safeguard existing residential amenity. In addition the policy wording will reflect the access arrangements which satisfy the Highway Authority and ensure safe vehicular and pedestrian access within the site and to the existing network.

Further consideration has been given to allocation of additional land at Stanway now that further work has been carried out in respect of the proposed Garden Community to the west of Colchester. A number of alternative sites were promoted for Stanway through the Consultation. The following sites having been assessed as being appropriate with favourable consideration as part of the SLAA and Sustainability Appraisal assessments.

Land between London Road and A12 Stanway: It will be recommended that land between London Road and Stanway be allocated for 500 houses and that the settlement boundary be amended to include this. An allocation policy will be drafted to reflect adequate protection of relevant site constraints, to ensure there is a separation

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|---|
| between settlements and safeguard existing residential amenity and ensure provision for sufficient infrastructure and site specific requirements to support delivery. | | |
| Land north west of 296 London Road: It will be recommended that land north west of 269 London Road Stanway be allocated for approx. 130 houses. This adjoins the site recommended for allocation, the settlement boundary will be amended to also include this. An allocation policy will be drafted to reflect adequate protection of relevant site constraints and safeguard existing residential amenity and ensure provision for sufficient infrastructure and site specific requirements to support delivery. | | |
| As detailed above further consideration is being given to alternative uses of some employment allocations in Stanway. | | |
| Sites at Lexden Spring School site and Essex Fire Brigade Workshop will be included in the settlement boundary. | | |
| Colchester Zoo | 3 | <ul style="list-style-type: none">• Support for Masterplan approach• Essential to consider junction improvements and transport and access strategy for the zoo and in the wider context.• Support reference to Mineral safeguarding and associated requirements• Details comments regarding policy wording on public rights of way and protection / enhancement biodiversity / environmental assets.• Support in principle to approach• Policy should include reference to Surface water management and SuDs |
| Policy WC3: Colchester Zoo | 7 | |
| CBC Response | | |
| Comments are noted and no significant amendment to Policy is necessary | | |
| Policy WC4: West Colchester | 8 | General comments from ECC on WC4 – total development 308 dwellings: further expansion of primary provision would be required; plans for secondary |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|---|
| | | schools in area would allow the provision of additional secondary places to serve this area. |
| <ul style="list-style-type: none"> Land at Gosbecks Phase 2 | 2* | <ul style="list-style-type: none"> Historic England welcome policy wording in respect of scheduled monument and archaeological potential. Not acceptable location so close to a historic site. It would create an even higher throughput of traffic for cyclists and horse riders to have to deal with when exercising in the area. Crossing Maldon Road is horrible. it should be made clear that improved public transport services and infrastructure would be required Support from the site promoter with some suggested amendments to policy wording / requirements including to read approximately 150 dwellings and other details which will be considered by the planning application process; |
| <ul style="list-style-type: none"> South of Berechurch Hall Road | 2 | <ul style="list-style-type: none"> ECC – no public transport services along Berechurch Hall Road. ECC – the paragraph (6.87) refers to access onto Berechurch Road. Suggest this should be Berechurch Hall Road. <p>Promoter of 2 of the 3 land parcels supports allocation and has begun discussions with land owners of remaining land parcel.</p> |
| <ul style="list-style-type: none"> Land at Irvine Road | 9* | <ul style="list-style-type: none"> RSPB – support policy regarding Ecological Management Plan. Recommend provisions made to secure long term ecological management of the site; ECC – require clarification on access arrangements if there is no public access to this land (para 6.88); Comment regarding ensuring Norman Way remains as a bridleway; |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|--|
| | | <ul style="list-style-type: none"> • IRARA wish Orchard protected and managed and object to allocation. If policy WC4 is retained measures are needed to guarantee security of remaining Orchard land – ownership of remaining land transferred to a body with the Orchard's wildlife at its heart. • Colchester Civic Society – object as one of a tiny handful of old orchards left in the country. It should be managed properly as a community asset. • If this is promoted so should site at Highfield Drive be. • Support on behalf of the site promoter |
| Alternative Option | 2 | <p>Alternative sites proposed on sites including;</p> <ul style="list-style-type: none"> ○ Land North of St Albans Road (two site areas indicated in representation- 0.58 / 0.91) ○ Land at Highfield Drive 0.03ha |
| <p>CBC Response: The comments relating to the proposed allocations of Land at Gosbecks Phase 2 and South of Berechurch Hall Road are noted. No significant changes will be necessary, other than amendment to the map for accuracy. Further consideration will be given to policy wording to reflect adequate protection of relevant site constraints and safeguard existing residential amenity and provision for infrastructure requirement as appropriate. In addition the policy wording will reflect the access arrangements which satisfy the Highway Authority and ensure safe vehicular and pedestrian access within the site and to the existing network.</p> <p>Mapping change will be made to reflect consistency with the Policy wording for the Irvine Road allocation which will safeguard part of the site for wildlife interest. Minor wording changes to the supporting text will also be made to provide consistency with the policy.</p> <p>The alternative sites promoted are not supported with land at St Albans Road being adjacent to Hilly Fields which is not considered suitable for development and land at Highfield Drive, which is former garden land and too small (0.03ha) to be considered for assessment or allocation. The SLAA minimum size threshold is 0.25ha which is compliant with National Guidance.</p> | | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|------------|---|
| GARDEN COMMUNITIES | 6 | Comments relating to the Garden Community proposals refer to issues above under SP8 and SP9 |
| CBC Response | | |
| See response above to SP8 and SP9 | | |
| SUSTAINABLE SETTLEMENTS | | Note generic comment from Essex County Council on School Places (not repeated in each settlement but potentially relevant to all): ECC have said in many cases the Primary School places can be accommodated either in existing schools or in expanded schools. They have also stated that there might be an impact from the accumulation of new school places needed if new houses are also built in adjacent villages. In most cases they have said there will be implications on Secondary School places with development. These will need to be addressed by appropriate contributions/expansion/new build as required at the time. |
| ABBERTON AND LANGENHOE | 1 | <p>General Comments</p> <ul style="list-style-type: none"> • Do not need additional housing; • Not a sustainable settlement; • Speeding traffic through village, inadequate footways; • School would need expansion; • School parking issues; • Need for starter homes in the village; • Sites will require screening under HRA due to proximity to Abberton Reservoir SPA/Ramsar site; • Visibility issues at Peldon Road/Layer Road junction identified by ECC. <p>Peldon Road site</p> <ul style="list-style-type: none"> • Development would disconnect listed building from rural context (Pete Tye House); • Peldon Road rural character, ditched hedges; |
| Policy SS1: Abberton and Langenhoe Housing Sites | 44 | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|---|
| | | <ul style="list-style-type: none"> Revised proposal received from promoter for up to 50 homes on just on west side of Peldon Road with potential for village car park or financial contribution. <p>Ashpark House site</p> <ul style="list-style-type: none"> Access along privately owned drive; Impact on many native species including nightingales; Rear gardens in Peldon Road flood; Representation received from promoter to enlarge site to 10 dwellings |
| CBC Response <p>Abberton is identified as a sustainable settlement within the spatial strategy and as such is justified to support additional growth. The issues raised are noted and the school capacity concerns are acknowledged. Any expansion required will need to be addressed as part of development in the village. The concerns raised regarding local traffic concerns are noted and access to the sites will be designed with the Highway Authority to ensure adequate capacity exists and safe vehicle and pedestrian access is provided.</p> <p>It will be recommended that the Ashpark House allocation is removed from the Plan with further investigation demonstrating concerns regarding satisfactory access to the site. The site at Peldon Road will be extended to the south to accommodate additional dwellings and provide an area for school car parking to address local parking issues. Play equipment will also be included within the site to encourage parents to use the car park.</p> <p>The Plan will be subject to a Habitats Regulations Assessment as required by the relevant legislation.</p> | | |
| BIRCH | 2 | <ul style="list-style-type: none"> Lack of infrastructure eg no medical facilities or shops; High levels of traffic already on road; Parking issues at school; Consideration needs to be given to neighbouring Listed Buildings; Need a range of affordable properties; Early years and Primary School could accommodate growth; |
| Policy SS2: Land East of Birch Street | 14 | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|--|
| | | <ul style="list-style-type: none">• Site will require screening under HRA due to proximity to Abberton Reservoir SPA/Ramsar site;• Additional information provided by promotor for two development options. <p>Alternative site promoted via representation</p> <ul style="list-style-type: none">• Land at Birch Business Park, Maldon Road, Birch. |
| CBC Response <p>Birch is one of the smaller villages identified in the Preferred Options as a Sustainable Settlement. Since drafting the evidence which considered the relative sustainability of the settlements around the Borough, the Doctor’s surgery has closed in the village. As other services are limited, the Council has formed the view that the range of services/facilities in Birch Green is now more comparable with the Borough's 'Other Villages' rather than the 'Sustainable Settlements', and as such allocation for development in this location will no longer be supported by the Spatial Strategy. Consequently it will be recommended that Birch be classified as an 'Other Village' in the spatial hierarchy and that the allocation of land east of Birch Street will be removed from the Local Plan.</p> <p>The alternative site at Birch Business Park will not be supported as the identification of the settlement as an “Other Village” suggests that allocation of the site is not supported by the spatial strategy and is considered to be unsustainable.</p> | | |
| BOXTED | 2 | <ul style="list-style-type: none">• Lack of infrastructure at Hill Farm site;• Support for continued small scale employment use on Hill Farm Site;• Lack of consultation on Neighbourhood Plan;• No early years or Primary School capacity issues;• Development should consider impact on Listed Building. |
| Policy SS3: Boxted Housing Sites | 8 | |
| CBC Response | | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|---|
| Comments noted. The Boxted Neighbourhood Plan is now made and includes the allocation of this site. | | |
| CHAPPEL | | <ul style="list-style-type: none">• Parking issues at Swan Grove;• Too many houses for the site/capacity of the village infrastructure;• Support for proposal from Parish Council – some comments on Policy wording.• Access to the site should not be limited to a single access point from Swan Grove but should also be accessed from the existing vehicular access point, direct to the site, at the top of Chappel Hill opposite Hill Farm Bungalow, connecting with the southern end of Swan Grove, facilitating through traffic flows and alleviating some of the existing problems <p>Alternative sites promoted via representations</p> <ul style="list-style-type: none">• Vernon’s Road: 21 dwellings• Spring Gardens: 21 dwellings <p>Land to west of Bures Road with recreation provision off Colchester Road (north): 50 dwellings</p> |
| Policy SS4: Chappel Housing Sites | 17 | |
| CBC Response | | |
| <p>It will be recommended that the allocation be retained with further consideration given to policy wording to reflect adequate protection of relevant site constraints and safeguard existing residential amenity. In addition the policy wording will reflect the access arrangements which satisfy the Highway Authority and ensure safe vehicular and pedestrian access within the site and to the existing network. The allocation may also include the opportunity to provide parking to address issues raised in Swan Grove. Minor changes to the policy wording will therefore be recommended.</p> <p>The alternative sites at Vernons Road and Spring Gardens are both located away from the concentration of key services within Chappel and Wakes Colne, close to small detached clusters of development which are proposed</p> | | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|---|
| <p>remove the settlement boundary due to their unsustainable location. Therefore it is considered that allocation of these sites is not supported by the spatial strategy and is considered to be unsustainable.</p> <p>The alternative site on Bures Road, with recreation provision on Colchester Road is not supported for allocation as additional sites in Chappel are not required and concerns regarding the potential impacts on the landscape remain as the site is quite prominent in the landscape from the south and development could adversely affect landscape character. Development of the site would extend the village's existing development edge along Bures Road into the open countryside.</p> | | |
| COPFORD AND COPFORD GREEN | 5 | <p>Hall Road</p> <ul style="list-style-type: none"> • Housing numbers too large/disproportionate level of growth; • Alternative brownfield sites in Copford should be delivered first; • No capacity at Copford Primary School; • No mention of affordable housing, density and mix important; • Lack of adequate infrastructure; • Environmental impacts on Roman River Valley; • Loss of agricultural land; • High traffic volumes |
| Policy SS5: Copford Housing Sites | 39 | <p>Queensbury Avenue</p> <ul style="list-style-type: none"> • Decision on housing numbers required is premature • Housing numbers too large • Alternative brownfield sites exist in Copford that should be developed first • School capacity issues at primary and secondary schools • No mention of affordable housing provision as part of proposal • Queensberry unsuitable access – • Upgrade existing PROW for all users including horse riders |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|---|
| | | <ul style="list-style-type: none"> • Impact on residential and public amenity • Service cables follow PROW- would also need to be diverted • Loss of trees – used by bats • HE – no concerns about impact on strategic road network • No capacity at primary school in Copford. Primary School already has significant amount of temporary accommodation • New play area requested • Queensberry Avenue is a feeder road ending in cul- de sac – new development would increase houses served off this road to 220 which is not complaint with EDG <p>Alternative sites promoted via representations</p> <ul style="list-style-type: none"> • London Road Marks Tey (Car Boot Sale Site): 60-70 dwellings; site previously assessed in SLAA; • Renzlands & Telephone exchange: site suggested – not by land owner; no information provided. |
| <p>CBC Response</p> <p>Copford is identified as a sustainable settlement within the spatial strategy and as such is justified to support additional growth.</p> <p>The concerns raised regarding local traffic concerns are noted and access to the sites will be designed with the Highway Authority to ensure adequate capacity exists and safe vehicle and pedestrian access is provided. The issues raised are noted and the school capacity concerns are acknowledged and any expansion required will need to be addressed as part of development in the village.</p> <p>The allocations for development on sites at Hall Road and Queensbury Avenue will be recommended to be retained with further consideration given to policy wording to reflect adequate protection of relevant site constraints and safeguard existing residential amenity. There will be a requirement for the development to contribute towards</p> | | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|--|---|
| <p>affordable housing in accordance with the relevant policy requirement adopted. Any evidence which identifies a specific need can be reflected in this provision</p> <p>The alternative sites suggested are not considered appropriate for allocation, with the Renzlands / Telephone exchange site having no further information provided and no evidence of availability being significant constraints. Developing the London Road site would lead to coalescence between Marks Tey and Copford, which is not desirable</p> | | |
| DEDHAM AND DEDHAM HEATH | 4 | <p>Corner of The Heath and Long Road West</p> <ul style="list-style-type: none"> • Impact on AONB; • Traffic congestion/safety; • Sewage/surface water drainage issues; • Impact on Listed Building; • Covenant preventing development on the land. |
| Policy SS6: Dedham Heath Housing Sites | <p>74</p> <p>Plus a petition with 168 signatures</p> | <p>North of Long Road East</p> <ul style="list-style-type: none"> • Impact on AONB and prominence of the site when viewed from the north within the AONB; • Traffic congestion/safety; • Sewage/surface water drainage issues; • Impact on Listed Building (Old Church House); • Layouts submitted by site promoter. <p>South of Long Road East</p> <ul style="list-style-type: none"> • Impact on AONB; • Traffic congestion/safety; • Sewage/surface water drainage issues; • Support from site promoter but no new information submitted. <p>Alternative sites promoted via representations:</p> |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|--|------------|--|
| | | <ul style="list-style-type: none"> • North of Long Road East: approx. 5 dwellings • Back land development using Sun Downe for access: 17 dwellings; site previously assessed. |
| CBC Response <p>Following further consideration it will be recommended that the residential allocations in Dedham Heath are removed from the Local Plan on the basis that they are located within or adjacent to the Dedham Vale Area of Outstanding Natural Beauty and it is not considered to be justifiable given the availability of additional residential land in areas of lower landscape value elsewhere in the Borough. Furthermore the sites are some distance from the nearest services and facilities in Dedham village and development of the scale previously proposed is not able to adequately mitigate against this important sustainability indicator.</p> <p>Representations have been received promoting land on the southern boundary of the existing settlement however development at this location is considered to have worse sustainability credentials than the previously promoted sites given that the settlement's core services and facilities are located in Dedham village, to the north of Dedham Heath.</p> <p>For the purposes of consistency with the Local Plan spatial strategy it will also be recommended that Dedham Heath will be classed as an 'Other Village' in recognition of its unsuitability and lower sustainability for further residential allocations and ability to support sustainable growth.</p> | | |
| EIGHT ASH GREEN | | <ul style="list-style-type: none"> • Housing numbers shouldn't be minimum; • Impact on A12 Junction 26; • Impact on Listed Building setting; • School capacity issues – ECC consider primary school could potentially expand; • Surface water flooding risk; • Development should be split between Fiddlers Farm site and land north of Halstead Road. |
| Policy SS7: Eight Ash Green | 12 | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|--|
| | | Alternative sites promoted via representation: <ul style="list-style-type: none">• Halstead Road East: 61 dwellings; site assessed previously in SLAA (RNW09);• Halstead Road: 30 or care home; site assessed previously in SLAA (STN20);• Brick & Tile PH site, Halstead Road: 8 dwellings• Halstead Road adjacent Choats Hill SB: approx. 25 dwellings |
| CBC Response <p>The Eight Ash Green Neighbourhood Plan will make site allocations, so the points raised and alternative sites will be considered as part of the Neighbourhood Plan.</p> <p>The Local Plan will retain the housing number and direction of growth referencing the intention of the Neighbourhood Plan to allocate sites to provide certainty and policy guidance until such time the NHP is made.</p> | | |
| FORDHAM | | <ul style="list-style-type: none">• Fordham PC support proposed number of dwellings;• Primary School can accommodate growth, Early Years has current capacity;• Proposed location should be nearer village;• Increased risk of accident and noise;• Further information provided by site promoter with regard to highway access. |
| Policy SS8: Fordham | 7 | |
| CBC Response <p>Fordham is identified as a sustainable settlement within the spatial strategy and as such is justified to support additional growth.</p> <p>The allocation for development at Plummers Road will be recommended to be retained with further consideration given to policy wording to reflect adequate protection of relevant site constraints and safeguard existing residential</p> | | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|---|
| amenity. The concerns raised regarding local traffic concerns are noted and access to the site will be designed with the Highway Authority to ensure adequate capacity exists and safe vehicle and pedestrian access is provided. The issues raised are noted and the school capacity concerns are acknowledged and any expansion required will need to be addressed as part of development in the village where it is evidenced at the time. It is noted that Essex County Council has indicated that Primary School and Early Year provision can accommodate the growth proposed. | | |
| GREAT HORKESELEY | 5 | Great Horkesley Manor site |
| Policy SS9: Great Horkesley | 44 | <ul style="list-style-type: none"> • Housing not needed, Gt Horkesley should remain a village; • Congestion in village and around North Station will get worse; • Pressure on infrastructure; • No local shops and amenities; • Children would have to cross busy road; • No safe pedestrian route along A134, pavements narrow and speeding traffic; • Access to Myland should be improved; • Loss of agricultural land; • Lack of development for employment; • Parish Council support both sites; • Query over need to expand village hall; • Additional information provided by site promoter regarding omitted land. <p>Alternative Site promoted:</p> <ul style="list-style-type: none"> • Coach Road – Land north of Coach Road promoted for 140 dwellings and provision for open space. |
| CBC Response Great Horkesley has a range of facilities and is one of the Borough's sustainable settlements. It is an appropriate location for a limited number of new dwellings over the plan period. Housing will need to be of a mix and type to meet local needs. | | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|--|
| <p>The allocations at Great Horkesley Manor and School Lane will be recommended to be retained in the plan. The issues raised are noted and minor wording changes will be incorporated to add clarity and reflect some of the points. with further consideration given to policy wording to reflect adequate protection of relevant site constraints and safeguard existing residential amenity.</p> <p>The requirement in the draft policy for traffic management and crossing opportunities will remain in the policy, helping to encourage walking as a safe and reasonable option throughout the village, including to the school. Essex County Council has confirmed in their representation to the Draft Local Plan that whilst the Bishop William Ward CE VC Primary School, which serves Great Horkesley, is operating at close to capacity, forecasts indicate a decline in pupil numbers in future years which would allow the school to accommodate the level of growth proposed in the Plan.</p> <p>The alternative site promoted at Coach Road is not supported as it is not considered appropriate to allocate further development in Great Horkesley in addition to the sites in the Preferred Options Plan and it is considered that the Manor House site has advantages over this site in particular associated with relative access to public transport, proximity to services and facilities, and visual impact.</p> | | |
| GREAT TEY | 3 | <ul style="list-style-type: none"> • Primary school capacity and growth can be accommodated; • Parish Council support proposal but consideration to investigate traffic calming measures including footway; • Opportunities should be explored to upgrade PROW to bridleway; • Concern regarding development on a very narrow country road; • Road has existing parking issues; • Access issues into site, safe access/exit; • Question ability to provide safe footway; • Support from site promoter. <p>Alternative sites promoted via representation:</p> <ul style="list-style-type: none"> • Land between Greenfield Drive and Newbarn Road: 40 dwellings plus 1ha public open space adjacent to existing sports pitches. |
| Policy SS10: Great Tey | 11 | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|--|--|---|
| CBC Response <p>Great Tey is identified as a sustainable settlement within the spatial strategy and as such is justified to support additional growth.</p> <p>The comments are noted. It will be recommended that the allocation at Brook Road will be retained in the Plan with further consideration given to policy wording to reflect adequate protection of relevant site constraints and safeguard existing residential amenity. The concerns raised regarding road safety concerns are noted and access to the site will be designed with the Highway Authority to ensure adequate capacity exists and safe vehicle and pedestrian access is provided. ECC commented that the school could accommodate the pupils generated from the allocated site.</p> <p>It will be recommended that an additional allocation on land at Greenfield Drive for 40 dwellings plus provision of an extension to the Playing Field be allocated in Great Tey. Although this will represent an increase in the level of growth in this location, it provides an opportunity to extend the playing field. In addition the site is in a location which is relatively free of constraints, and therefore more suited to an additional allocation than some other locations around the Borough.</p> | | |
| LANGHAM | 2 | General comments – all sites: |
| Policy SS11: Langham | 70 Plus a petition with 267 signatures | <ul style="list-style-type: none"> • Total number of houses too high and not proportionate, should not be higher than 85 dwellings; • Will become suburb of Colchester; • Inadequate infrastructure and facilities; • Traffic on School Road – accident risk for school children; • Inadequate public transport; • Development could have an impact on substandard A12 junction (Highways England); • Development would impact on AONB - landscape assessment required for sites near AONB; • Land use conflict – industry/school/housing; • Lack of evidence during consultation; |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|--|
| | | <ul style="list-style-type: none"> • Loss of Grade 2 agricultural land currently actively farmed. <p>Wick Road</p> <ul style="list-style-type: none"> • Potential impact on Listed Building; • Supported by Parish Council for frontage development. <p>School Road</p> <ul style="list-style-type: none"> • Parish Council support frontage development of site to right of Powerplus but consider site selected hadn't received proper identification earlier as a potential site. Object to estate development, total number due to impact on School Road, effect on village character; • Development would affect historic character of Boxted Airfield; • Upgrades to School Road needed; • Inadequate drainage; • Move industry away; • Availability confirmed of Powerplus. <p>Alternative sites promoted via representation:</p> <ul style="list-style-type: none"> • Langham Cottage, 9 High Street: 1 to 4 dwellings; • Lodge Lane: commercial 1.76ha existing; 1 ha potential new; • Extension to Powerplus site: commercial 1.06ha extension; • Land at Perry Grove: 5 dwellings; previously assessed in SLAA (RNE06). |
| <p>CBC Response: Langham is identified as a sustainable settlement within the spatial strategy and as such is justified to support additional growth.</p> <p>It will be recommended that the three housing allocations for Langham be retained, but that the two allocations on School Road be reduced in number to address infrastructure capacity issues (sewage in particular) and local</p> | | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|---|
| <p>concerns about village character and impact. Further dialogue with the Parish Council and site promoters will continue to agree the final number for the allocations.</p> <p>The alternative housing sites suggested are not considered appropriate given that further sites in Langham are not required and Langham Cottage development would have landscape impacts and vehicle/pedestrian access at Perry Grove could be constrained.</p> <p>Allocation of further employment land at Langham will be considered in light of the recommendations of the Employment Land Needs Assessment Study Update to be published alongside the Submission version of the Local Plan.</p> | | |
| LAYER DE LA HAYE | 1 | <ul style="list-style-type: none">• Comments range from 50 houses too much to support for 50 houses (no more);• Opposition to proposed site access;• Existing infrastructure and facilities inadequate;• Primary school could accommodate growth;• Screening site under HRA required;• Site promoter request amend polity to read approx. 50 dwellings;• Site promoter provided additional information including illustrative plan and delivery statement;• Challenge raised over the proposed removal of Malting Green settlement boundary. <p>Alternative sites promoted via representation:</p> <ul style="list-style-type: none">• Malting Green: 10 dwellings; previously assessed (RSE09) |
| Policy SS12: Layer de la Haye | 42 | |
| <p>CBC Response: The comments are noted. No significant change to the policy will be required, as it already covers requirements in respect of supporting infrastructure. Alternative access to the site is not supported by the Highway Authority, although support has been expressed regarding temporary access arrangements from the Folley during</p> | | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|---|
| <p>construction. This will be considered further with the highway Authority and appropriate wording will be included in Policy SS12.</p> <p>The alternative site proposed at Malting Green is not supported. It relates to the Malting Green settlement boundary which is proposed for removal in the Preferred Options Plan due to its relative sustainability and being situated remote from the key services available in the core of the village.</p> | | |
| MARKS TEY | 1 | <ul style="list-style-type: none"> • Marks Tey Parish Council - SS13 should be unchanged until further clarity of wider strategic implications are clear. Investigation should be undertaken to explore innovative ways by which evolving Neighbourhood Plan can link into wider strategy to form a Neighbourhood Plan 'plus'. • Environment Agency – expansion of Copford facility needed. • Highways England – Development here would have severe impact on the Strategic Road Network. Proposals to widen both A120 and A12 may affect the site. • Historic England – significant number of grade II listed buildings in Marks Tey which need consideration in determination of growth proposals. • Natural England – need to have regard to Marks Tey Brickpit SSSI and findings of Habitat Regulations Assessment to be carried out. • Proposals for small sites in Marks Tey area put forward by landowners/developers. • Objections to Garden Community proposals for area. |
| Policy SS13: Marks Tey | 20 | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|---|
| CBC Response Decisions on smaller allocations will be made by the Marks Tey Neighbourhood Plan once there is more certainty on the scope for such allocations outside a Garden Community. The Council want to increase the support offered to the Parish Council. Amendments to explanatory text will be recommended to highlight concerns of statutory consultees. | | |
| ROWHEDGE | 18 | Battleswick Farm |
| Policy SS14: Rowhedge | 204 | <ul style="list-style-type: none"> • Loss of greenfield/agricultural land; • Impact on doctors surgery; • Impact on Primary School – school cannot expand; • Cumulative impact on infrastructure and facilities with other new developments; • Flooding issues; • Loss of hedgerows; • Coalescence with Old Heath; • Overlooking on to existing properties; • No further information submitted by site promoter. <p>Alternative sites promoted via representation:</p> <ul style="list-style-type: none"> • Rowhedge Business Centre: 60 dwellings |
| CBC Response: The representations raise a range of issues, which include concerns which relate specifically to the site location at Battleswick Farm including potential coalescence of the village with Old Heath, flood risk, landscape impact and potential impact of nearby residents. Other concerns relate to the capacity of the infrastructure to accommodate further growth, in particular the school and the Doctor's surgery. An alternative site at Rowhedge Business Park was previously assessed and not supported due to its function providing employment in the village. This consultation has provided new evidence in respect of this site which demonstrates the inherent unsuitability of the site for any enhanced role for employment. In addition, the site | | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|--|
| <p>promoter has sought to address improvements to health care provision identified as a key infrastructure problem in Rowhedge which is able to be improved by the provision of land for a new GP surgery which has been met with support by the North East Essex Clinical Care Commissioning Group.</p> <p>It will be recommended that the site at Battleswick Farm be removed from the plan as a housing allocation and that land at the existing Business Park be allocated for 40 houses and a site within the allocation be reserved for health care provision. Policy wording to support the allocation will be provided including safeguarding land for a new GP surgery (wording to be agreed with relevant Health care representatives).</p> <p>Whilst issues with local education capacity will need to be addressed, the reduced residential growth at the business centre will reduce the strain on primary school capacity before mitigation options are explored with the school and Essex County Council. Additionally the redevelopment of the business centre will be phased over the plan period to ensure that the impact on primary school places emanating from the Wharf development is properly mitigated before any additional residential development is built</p> | | |
| TIPTREE | 15 | <p>Neighbourhood Plan will define Settlement Boundary and allocate specific sites. Comments on direction of growth:</p> <ul style="list-style-type: none"> • Housing numbers; • Cross boundary issues; • Longstanding access problems to A12; • School capacity – surplus capacity exists but there will be additional required, including Secondary expansion and new Early Years facility needed; • Flood risk; • Map changes/corrections needed; • Additional information provided by site promoters – additional highway information to support site TIP09 and additional information to support sites TIP03, TIP10 and TIP11. <p>Alternative sites promoted via representation:</p> |
| Policy SS15: Tiptree | 35 | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|--|
| | | <ul style="list-style-type: none"> • Rhubarb Hall, Grove Road: approx. 10 dwellings (previously assessed TIP11); • Brook Meadow, Tiptree: 100 dwellings (previously assessed (TIP03); • Bull Lane: 74 dwellings (previously assessed TIP10); • Land off B1022 Maypole Road: no number dwellings specified; • Extra Care Home, Factory Hill: 80 units; • Grove Road Tiptree: 75-80 dwellings & 25/30 affordable; • Wood Lane: no number dwellings specified. |
| <p>CBC Response</p> <p>The Tiptree Neighbourhood Plan will make site allocations, so the points raised and alternative sites will be considered as part of the Neighbourhood Plan.</p> <p>The Local Plan will retain the housing number and direction of growth referencing the intention of the Neighbourhood Plan to allocate sites to provide certainty and policy guidance until such time the NHP is made.</p> | | |
| WEST BERGHOLT | | Neighbourhood Plan will define Settlement Boundary and allocate specific sites. Comments on direction of growth: |
| Policy SS16: West Bergholt | 10 | <ul style="list-style-type: none"> • Developer contributions would be required to expand early years facilities; • School could accommodate level of growth; • Neighbourhood Plan should include SuDs requirements; • Parish Council request policy read 100 dwellings and suggest that 20 dwellings will be provided in settlement boundary; • Parish Council request other areas to be identified as Local Economic Areas; |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|---|
| | | <ul style="list-style-type: none"> • Parish Council would like to see area of West Bergholt to be designated as Special Character Area, and area south of village to be designated as Special Landscape; • Limiting development to 120 homes may prevent Parish from delivering wider benefits – should be at least 150 homes as per Eight Ash Green; • Policy aimed at preventing coalescence is welcomed – concern over development in Braiswick; • Promoter of alternative site disagrees with broad areas of growth – disregards other suitable sites; • Question designation of Pattens Yard given unsustainable location; <p>Alternative sites promoted via representation:</p> <ul style="list-style-type: none"> • Colchester Road (WBG03 & WBG04): sites previously assessed – objection on broad areas of growth and further information provided; • Cooks Hall Lane: 3 dwellings; • Land behind the White Hart PH, Nayland Road: approx. 6 dwellings. |
| <p>CBC Response</p> <p>The West Bergholt Neighbourhood Plan will make site allocations, so the points raised and alternative sites will be considered as part of the Neighbourhood Plan.</p> <p>The Local Plan will retain the housing number and direction of growth referencing the intention of the Neighbourhood Plan to allocate sites to provide certainty and policy guidance until such time the NHP is made. West Bergholt is considered a sustainable settlement and 120 houses over a 15 year period is considered proportionate to the size of the village and the available facilities and infrastructure and reasonable contribution towards the overall Borough Housing Delivery Target (920 dwellings/year. An allowance for windfall development has already been taken into account as part of the Borough housing provision in addition to the annual housing delivery target, which allows for unallocated usually small sites, within the settlement boundary, coming forward during the plan period.</p> | | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|--|--|--|
| MERSEA ISLAND | 16 | <p>General Comments – development on Mersea Island</p> <ul style="list-style-type: none"> • Housing numbers too high for Mersea Island; • Need to check population figures for Mersea – caravan parks are being used year round as permanent residences; • Primary School and Early Years facilities would need expansion; • Inadequate infrastructure and facilities to cope with further developments – problems compounded in summer due to influx of tourists; <p>Only one road off the island, regular flooding and poses evacuation risk in event of an accident at Bradwell Nuclear Power Station</p> <p>Dawes Lane</p> <ul style="list-style-type: none"> • Flood risk – significant part of the site is subject to surface water flooding; • Inadequate access. <p>Brierley Paddocks, East Road</p> <ul style="list-style-type: none"> • Private access – access to site questioned; • Impact on Listed Building (Brierley Hall); • Additional information provided by site promoter to support site. <p>Alternative sites promoted via representation:</p> <ul style="list-style-type: none"> • East Road: 48 dwellings (site previously assessed MER24). |
| East Mersea | 2 | |
| West Mersea | 24 | |
| Policy SS17a: Mersea Housing and Employment | 534 Plus a petition with 143 signatures | |
| Coast Road | 7 | |
| Policy SS17b: Coast Road | 24 | <ul style="list-style-type: none"> • Environment Agency support the presumption against residential development; • Projects within Coast Road should be screened under the Habitat Regulations; |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|---|
| | | <ul style="list-style-type: none">Proposed new housing in Mersea will generate additional traffic in this area;Mersea Waterfront should be strengthened further to avoid change of use to residential;The environmental impact of motorised leisure equipment needs to be looked into as it could cause damage by dredging up the seabed and wave impact on The Strood Road;Object to new housing in Mersea. |
| Caravan Parks | 3 | <ul style="list-style-type: none">Caravan parks add to the pressure of the infrastructure without contributing financially;Caravan parks should build a stronger rapport with the island;Reference should be made to flood warning and evacuation arrangements;Many caravans are the main home of the occupiers;Direct and indirect impacts to designated nature conservation sites need to be assessed;Congestion will increase, particularly during the summer;Sustainable travel to caravan sites is very unlikely as no buses pass most of the sites and there is no room to build bikes lanes. |
| Policy SS17c: Caravan Parks | 15 | |
| CBC Response: Following a review of the consultation responses and discussions with the site promoters, it will be recommended that the number of houses being proposed for West Mersea is reduced from 350 to 200. The reduction in housing numbers reflects the infrastructure capacity on Mersea, and the need to consider alternative highway access to the 2 sites. The Primary School in West Mersea will need to expand to provide new places and the school has confirmed that there is scope to extend to meet the need. Neither Anglian Water nor the Environment Agency have identified any capacity issues in relation to waste water and sewage capacity. The draft Water Cycle Study also concluded that there is sufficient headroom capacity at the Mersea Water Recycling Centre to accommodate the growth being proposed. This will help ensure that water quality is maintained which is important for both residents and the Oyster Fisheries around the Island. The Council will continue to work with infrastructure providers (e.g. NHS England) and Town Council to ensure that planned development is delivered alongside | | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|------------------------------|---------------|--|
| | | <p>necessary improvements to infrastructure and that deficiencies are not created. Neither Essex County Council as Highway Authority or Highways England have objected to the proposed growth in West Mersea on highway grounds. The decision about any future development at Bradwell Nuclear Power Station will be taken by Central Government via the Infrastructure Planning Commission. It is not an issue for Colchester's Local Plan. The Borough Council's Emergency Planning team is currently preparing an evacuation plan for Mersea in the event of a major flood event but they have confirmed that the principles embedded in this document for evacuation will be applicable for any type of evacuation needed. The Council uses Census data provided by the Office of National Statistics which is standard practice. The Council will continue to monitor this issue and consider appropriate action where necessary.</p> |
| WIVENHOE | | |
| Policy SS18: Wivenhoe | 12 | <ul style="list-style-type: none"> • Promoters of two of the allocated sites support allocations; • Clarification sought regarding the neighbourhood plan's requirement of a cemetery at Elmstead Road; • Environment Agency request involvement in the neighbourhood plan owing to flood risk issues; • Heritage assets must be considered; • Direct & indirect impacts to nature conservation sites need to be assessed; • Green infrastructure provision is essential; • Likely that one of the schools would need to be expanded by half a form and existing early years facilities would either need to be expanded or a new facility developed; • The hospital is unfit for purpose, the GP surgery is stretched & the dentist is closed to NHS patients; • Local infrastructure cannot cope with this number of homes. |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|---|
| CBC Response | | |
| <p>The Wivenhoe Neighbourhood Plan will make site allocations, so the points raised and alternative sites will be considered as part of the Neighbourhood Plan.</p> <p>The Local Plan will retain the housing number and direction of growth referencing the intention of the Neighbourhood Plan to allocate sites to provide certainty and policy guidance until such time the NHP is made.</p> | | |
| Development in Other Villages and Countryside | | |
| Policy OV1: Development in Other Villages and Countryside | 19 | <ul style="list-style-type: none"> • The policy should be reworded so as not to arbitrarily restrict suitable development from coming forward on the edge of settlements; • Historic England welcome the commitment to high quality design; • A criteria regarding SuDS should be added; • Policy appears to support infill developments, which could lead to coalescence between villages; • Any development of small villages should be restricted to an absolute minimum. • The sustainability of the other villages is being reduced by the draft policy; • There is little opportunity for development to come forward within settlement boundaries; • Peldon should be listed as a sustainable village; • The settlement boundary for Layer Marney should be expanded to include two brownfield sites; • Small scale development should be possible in the future. <p>Alternative sites promoted via representation:</p> <ul style="list-style-type: none"> • Nursery Site, Smyths Green, Layer Marney: approx. 12 dwellings; |
| <ul style="list-style-type: none"> • Other Villages | 8 | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|---|------------|---|
| | | <ul style="list-style-type: none">Grassreasons Poultry Farm, Newbridge Road, Layer Marney: approx. 6 dwellings;St Ives Road, Peldon: approx. 43 dwellings;Land adjacent Kingsland Villa, Abberton Road, Fingringhoe: 3 dwellings;Land adjacent Forge Cottage, Fingringhoe: approx. 15 dwellings;Picketts Farm, Church Road, Fingringhoe: 10-80 dwellings (6.97ha);Maldon Road, Great Wigborough: CUFC Football Training Academy 17.11ha (linked to Florence Park site, Tiptree);Little Baddocks Farm, Easthorpe Road, Easthorpe: 102 dwellings;Land south of Easthorpe Road, Easthorpe: 165 dwellings;Red House, Messing: approx. 3-9 dwellings;Birch Business Centre, Maldon Road;White Lodge Road, Layer Marney (Local Employment Area expansion).Development should be considered for Little Tey; |
| Countryside | 3 | <ul style="list-style-type: none">The housing needs survey for Layer Marney found that 73% of respondents support a small scale open market housing development;The interpretation of settlement boundaries needs further thought;It would be reasonable to treat small gaps between houses in small hamlets as infill.Village identities should not be eroded by removal of settlement boundaries.The settlement boundary of Peldon should not be removed. |
| Alternative options considered | 2 | |
| CBC Response Allocation of the sites suggested will not be supported as they are relate to settlements identified as an “Other Villages” which suggests that allocation of the site is not supported by the spatial strategy and is considered to be unsustainable. | | |

* Total figure includes representations to policy and supporting paragraph.

| LOCATION / PLACE POLICY | Total Reps | Key Issues raised in Representations |
|----------------------------|---------------|--|
| | | <p>In some cases there may be scope for proposals to be justified based on exceptions, need, or other site specific reasons where the benefits can be shown to outweigh the policy constraints, however, these should be tested through the Development Management Process rather than justified for Local Plan allocations.</p> |

* Total figure includes representations to policy and supporting paragraph.

Appendix 1c Summary of representations to development management policies

| POLICY | Total Reps | Key Issues raised in Representations |
|---|------------|---|
| DM1: Health and Wellbeing | 12 | <ul style="list-style-type: none"> • Policy is poorly worded and not practical • Include all vulnerable road users in this policy • Cross refer to Colchester Orbital project |
| 7.5 Alternative Options considered | 1 | <ul style="list-style-type: none"> • Support Colchester Orbital route |
| CBC Response: Policy is considered fit for purpose. Reference to Green orbital can be added to explanatory text. | | |
| Community facilities | 2 | <ul style="list-style-type: none"> • Support Colchester Orbital route • No mention of planning churches in new communities |
| DM2: Community Facilities | 5 | <ul style="list-style-type: none"> • Contributions towards such facilities should be sought when it passes CIL para 123 tests • ECC welcome discussions on a site by site basis • Where an alternative is provided accessibility is not the only criterion that needs to be met |
| CBC Response: No significant change required. Churches are mentioned in explanatory text. | | |
| DM3: New Education Provision | 5 | <ul style="list-style-type: none"> • Viability should be a key consideration • Where housing growth takes place it will be essential to ensure the delivery of education facilities is undertaken in a timely and phased manner • Definition of education needs to be expanded to include early years and adult education • New schools should include a strategy for encouraging cycling to school |
| CBC Response: No need to repeat national policy about viability. Policy will be revised to include reference to Early Years and adult education, to clarify that new education facilities will be required to support new development and that | | |

| POLICY | Total Reps | Key Issues raised in Representations |
|---|---------------|---|
| developers will be expected to provide/contribute to such facilities. Wording will also be added to final paragraph regarding safe walking and cycling routes to schools. | | |
| Strategic Sports | 2 | <ul style="list-style-type: none"> • CUFC is seeking to develop a high quality state of the art sports ground on a site in Great Wigborough • Bridleways should be maintained |
| DM4: Sports Provision | 5 | <ul style="list-style-type: none"> • Contributions towards such facilities should be sought when it passes CIL para 123 tests • This policy should not restrain or inhibit other sports development proposals outside the 3 hub sites referred to • University sports facilities will continue to improve • Mersea should be considered as a strategic hub for sport • Availability of sports and recreation facilities must be a priority |
| CBC Response: Comments noted. Reference will be added about bridleways. Great Wigborough is not considered to be a suitable location for a new sports ground for CUFC. | | |
| DM5: Tourism, Leisure, Culture and Heritage | 5 | <ul style="list-style-type: none"> • Flood risk should be highlighted • Cross refer to Colchester Orbital project • New opportunities for rural economic growth on brownfield land should be a key consideration • Walking and cycling schemes should be included |
| CBC Response: Policy to include reference to Leisure Routes in list of examples. | | |
| Economic Development in Rural Areas and the Countryside | 1 | <ul style="list-style-type: none"> • Barns should not be developed just because they are empty |

| POLICY | Total Reps | Key Issues raised in Representations |
|---|------------|--|
| DM6: Economic Development in Rural Areas and the Countryside | 3 | <ul style="list-style-type: none"> It should be clarified that there is a presumption that heritage assets in a poor state of repair will be retained rather than replaced The equestrian sector provides a very large contribution to rural economics across retail and agriculture |
| CBC Response: No significant change to policy required. There is already a general presumption about retention of buildings rather than new build. | | |
| Agricultural Development and Diversification | 1 | <ul style="list-style-type: none"> A huge new town at West Tey would do immense harm to the rural area |
| DM7: Agricultural Development and Diversification | 5 | <ul style="list-style-type: none"> Observations from ECC Highways seem to be at odds with practical common sense Policy is unduly restrictive |
| CBC Response: It is accepted that the Garden Community will be built on greenfield land but there are few brownfield sites remaining. Master planning is intended to address impacts on the rural area. The comments regarding Highways are noted (appear to relate to the Development Management process). No significant change required as the wording is considered to be consistent with National Guidance. | | |
| Affordable Housing | 1 | <ul style="list-style-type: none"> Colchester's target of affordable housing delivery is poor |
| DM8: Affordable Housing | 10 | <ul style="list-style-type: none"> Criteria a and b are contradictory Housing classified as independent living should be included within the definition The Plan proposes a level of affordable housing below that indicated as essential by its own research The Plan does not address the housing needs of Colchester, according to the evidence base there are going to be 45% of first time buyers priced out of the market 30% affordable housing is essential |

| POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|--|
| | | <ul style="list-style-type: none"> Policy does not refer to any specific methodology for assessing overall scheme viability Provision of affordable housing should be made in all sustainable settlements |
| CBC Response: The Council is reviewing its evidence about affordable housing and awaiting more information about starter homes. The policy may need to be revised to reflect this. This could include changing the target and other comments made will be considered alongside the new evidence base. | | |
| DM9: Housing Density | 3 | <ul style="list-style-type: none"> Appropriate density will vary across the Borough Consideration should be given to the need for open space including SuDS |
| CBC Response: Policy reflects the comments made – no significant change considered necessary. | | |
| DM10: Housing Diversity | 8 | <ul style="list-style-type: none"> Important to make distinctions between housing types to ensure they do not conflict the provision of specialist housing with general market housing Support recognition of the needs for older persons and specialist housing Lack of precision and evidence available Large strategic sites are not appropriate locations for self build Objection to the requirement to provide lifetime homes Policy needs to be strengthened to secure a range of housing types |
| CBC Response: Comments noted but no significant changes considered necessary. Minor wording changes could add clarity which would address many points raised. Officers disagree that large sites are not appropriate for self build. | | |
| DM11: Gypsies, Travelers and Travelling Showpeople | 8 | <ul style="list-style-type: none"> Refer to walking and cycling distance via a safe route Consideration needs to be given to any impact on protected sites Local Plan should make better provision for gypsies and travellers including land for a transit site Severalls site should not be expanded Provision needs to be adequate |

| POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|--|
| CBC Response: The number of sites planned for is supported by existing and emerging evidence at a county wide level. The Council are also working with other LA's across the county to secure Transit Site(s) in the right locations. Reference to walking and cycling and protected sites will be added to the policy. | | |
| Housing Standards | 1 | <ul style="list-style-type: none"> No reference to waste and recycling facilities in policy DM12 |
| DM12: Housing Standards | 8 | <ul style="list-style-type: none"> Any policy including specific requirements for design should be tested alongside other policies in the Plan The Council needs to provide sufficient evidence to justify adoption of these standards Policy should be more closely linked to policy DM25 The policy is not strong or specific enough. The provision of lifetime homes will not facilitate the diversity of housing choices required for older people Policy should not require developers to build homes to full wheelchair standards Reference should be made to guidance |
| CBC Response: Policy already includes a need to provide bin/recycling storage. No significant changes to policy considered necessary other than reference to Policy DM25. | | |
| Domestic Development: Residential alterations, extensions and outbuildings | 1 | <ul style="list-style-type: none"> Policy is duplicated |
| DM13: Domestic Development | 5 | <ul style="list-style-type: none"> Potential flood risk implications Presumption to retain buildings that are heritage assets should be referenced Policy needed on infill Mismatch between policy and planning approvals |

| POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|--|
| CBC Response: Flood risk and heritage assets are picked up in other policies – no need for duplication. The principle of infill is covered in Policy OV1 and other development management policies should adequately address detail including design and amenity. | | |
| Rural Workers Housing | 1 | <ul style="list-style-type: none"> Where is policy H6 |
| DM14: Rural Workers Housing | 1 | <ul style="list-style-type: none"> Reference should be included to avoid siting of rural workers in flood risk areas |
| Temporary Rural Workers Dwellings | 1 | <ul style="list-style-type: none"> Marketing period is excessive, should be 6 months |
| CBC Response: Reference to Policy H6 is a typo which will be corrected. Flood risk is picked up elsewhere in the plan. Marketing period will be reduced to 12 months | | |
| Design and Amenity | 1 | <ul style="list-style-type: none"> Council require additional suitably trained resources |
| DM15: Design and Amenity | 3 | <ul style="list-style-type: none"> Biodiversity should be included |
| CBC Response: No significant change necessary | | |
| Historic Environment | 1 | <ul style="list-style-type: none"> Colchester's importance as a historic town has been underplayed The opportunity to attract people to Colchester because of its heritage and historic assets should be optimised |
| DM16: Historic Environment | 11 | <ul style="list-style-type: none"> Policy should make a distinction between the two tests to ensure they are sound, at present the policy is one of blanket restriction The local list should cover character areas, parks and gardens, structures etc Heritage at risk should form part of the policy First paragraph sets out a presumption against development contrary to the NPPF |

| POLICY | Total Reps | Key Issues raised in Representations |
|--|---------------|--|
| | | <ul style="list-style-type: none"> • Doe's Mill is in a distressing state • An area south-west of West Bergholt should be designated as an Area of Special Character • Consider conservation area status for Fernlea/ Stonecrop |
| CBC Response: Wording will be clarified to ensure consistency with NPPF. Local listing criteria will be revised to include buildings, structures and streets. Site specific issues are not relevant to this policy. | | |
| Open Space | 1 | <ul style="list-style-type: none"> • How is provision for ongoing maintenance to be made? |
| DM17: Retention of Open Space and Recreation Facilities | 14 | <ul style="list-style-type: none"> • Existing ditches and watercourses as specific protected features should be included • Copford Parish Council has suggested protecting areas as Local Green Spaces • Habitat links should be maintained • The Fernlea open space should be recognised • Policy should recognise that where open space is developed for alternative uses greater flexibility should be provided to allow in some circumstances a smaller but improved quantity • Object proposed loss of the rugby club • Bridleways should be preserved • Any new open space should be accessible to all users |
| DM18: Provision for Public Open Space | 7 | <ul style="list-style-type: none"> • Existing ditches and watercourses as specific protected features should be included • It is not clear what document the Council will refer to in determining which deficits are present in an area • Policy should also cover mitigation and adaptation to climate change • Any new open space should be accessible to all users • The commuted sum should be ring fenced for the relevant community |

| POLICY | Total Reps | Key Issues raised in Representations |
|---|------------|---|
| DM19: Private Amenity Space | 3 | <ul style="list-style-type: none"> • Council should be flexible in rigidly adhering to these standards and have regard to a sites location • Variations to standards must be supported by a strong urban design case |
| CBC Response: Mapping changes will be made where appropriate to protect open space. Point regarding smaller but better quality facilities will be included. Clarity will be included about the evidence base on which deficiencies are calculated. Minor changes to wording in policy DM17 will be made to ensure that existing ditches and watercourses are protected as part of open space to reflect their ecological and flood risk functions. Objection to loss of Rugby Club noted and site specific issues are covered in Policy NC1. | | |
| Promoting Sustainable Transport and Changing Travel Behaviour | 3 | <ul style="list-style-type: none"> • Comments about pavements • Proposals for West Tey do not satisfy the aim to reduce the need to travel |
| DM20: Promoting Sustainable Transport and Changing Travel Behaviour | 12 | <ul style="list-style-type: none"> • Ways are sought within the Local Plan to enhance footpath and cycleway provision through Marks Tey • Reference should be made to the Highways Authority Development Management Policies • How will Council deliver transport and travel policy changes when it does not have responsibility for roads • The outer circuit of the Colchester Orbital should be referred to • Policy does not go far enough in terms of a future proof policy regarding car charging points |
| Sustainable Access to Development | 1 | <ul style="list-style-type: none"> • Links should be accessible to all users |
| DM21: Sustainable Access to Development | 14 | <ul style="list-style-type: none"> • Requirements too onerous for development involving existing building stock • Sufficient flexibility should be incorporated into the policy • Reference should be made to the Highways Authority Development Management Policies |

| POLICY | Total Reps | Key Issues raised in Representations |
|--|------------|---|
| | | <ul style="list-style-type: none"> Measures should only be encouraged Colchester cannot support increase in cars Policy does not go far enough in terms of a future proof policy regarding car charging points Local Plan should allow for implementation of road filtering and unbundling cycle schemes |
| CBC Response; Reference to be made to the Highways Authority Development Management Policies in explanatory text (not policy). Technology is evolving quickly and a policy which is too specific would soon become out of date. The Council as local planning authority can influence future development of transport infrastructure. | | |
| Parking | 2 | <ul style="list-style-type: none"> Too many cars |
| DM22: Parking | 8 | <ul style="list-style-type: none"> Agree with flexible approach to non-residential parking A further park and ride scheme would be an asset Some town centre car parks should remain More visitor car parking is needed The policy should allow reduced levels of parking for developments with high levels of affordable housing and/or small flats Policy should clarify that sustainable locations where lower parking would be acceptable can include high density sites with good public transport |
| CBC Response: No significant change considered necessary. Comments are mixed and reflect differing opinions on this subject. | | |
| Flood Risk and Water Management | 6 | <ul style="list-style-type: none"> Flood risk and water management should be separated Reference should be made to EA Risk of Surface Water Flooding maps Text needs updating |
| DM23: Flood Risk and Water Management | 4 | <ul style="list-style-type: none"> Sequential test needs to be applied to the Plan Future need for CIL towards tidal and fluvial flood management |

| POLICY | Total Reps | Key Issues raised in Representations |
|--|------------|--|
| DM24: Sustainable Urban Drainage Systems | 4 | <ul style="list-style-type: none"> Policy would benefit from re-wording Development should give priority to SuDS |
| CBC Response: All sites have been considered sequentially in terms of flood risk as the Local Plan has developed. A Flood Risk Sequential Test report is currently being prepared as part of the evidence base. The Environment Agency is drafting alternative wording for policies DM 23 & DM24. Changes to policy wording will be made reflect this along with other minor text changes needed to ensure that the flood risk sections in the Local Plan are up to date. | | |
| Renewable Energy | 1 | <ul style="list-style-type: none"> Policy reference in paragraph 7.148 are missing |
| DM25: Renewable Energy | 5 | <ul style="list-style-type: none"> Welcome that developers will be encouraged to meeting higher than minimum standards for water efficiency Re-wording suggested regarding Natura 2000 sites Anglian Water must balance need for development with protection of new and existing customers from risk of odour, nuisance and loss of amenity |
| CBC Response: Typo to be corrected. Policy amendments are needed to strengthen protection of Natura 2000 sites and to reflect Environment Agency comments in relation to waste. Other comments noted. | | |
| Delivery Strategy and Implementation | 6 | <ul style="list-style-type: none"> There is no IDP A definition of infrastructure is suggested |
| Monitoring | 2 | <ul style="list-style-type: none"> Welcome a target relating to the historic environment |
| Table 1 Monitoring | 1 | <ul style="list-style-type: none"> Much greater detail is required, each objective should have a target and key indicator |
| CBC Response: Infrastructure Delivery Plan (IDP) is underway to inform Submission Plan. Targets and key indicators will be reviewed and better aligned. | | |