

Local Plan Committee Meeting

**Grand Jury Room, Town Hall, High Street,
Colchester, CO1 1PJ
Monday, 05 October 2015 at 18:00**

The Local Plan Committee deals with the Council's responsibilities relating to the Local Plan

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COLCHESTER BOROUGH COUNCIL
Local Plan Committee
Monday, 05 October 2015 at 18:00

Member:

Councillor Martin Goss
Councillor Lyn Barton
Councillor Christopher Arnold
Councillor Elizabeth Blundell
Councillor Barrie Cook
Councillor Andrew Ellis
Councillor John Jowers
Councillor Kim Naish
Councillor Gerard Oxford

Chairman
Deputy Chairman

Substitutes:

All members of the Council who are not Cabinet members or members of this Panel.

AGENDA - Part A
(open to the public including the press)

Members of the public may wish to note that Agenda items 1 to 5 are normally brief.

1 Welcome and Announcements

- a) The Chairman to welcome members of the public and Councillors and to remind all speakers of the requirement for microphones to be used at all times.
- (b) At the Chairman's discretion, to announce information on:
 - action in the event of an emergency;
 - mobile phones switched to silent;
 - the audio-recording of meetings;
 - location of toilets;
 - introduction of members of the meeting.

2 Substitutions

Members may arrange for a substitute councillor to attend a meeting on their behalf, subject to prior notice being given. The attendance of substitute councillors must be recorded.

3 Urgent Items

To announce any items not on the agenda which the Chairman has agreed to consider because they are urgent, to give reasons for the urgency and to indicate where in the order of business the item will be considered.

4 **Declarations of Interest**

The Chairman to invite Councillors to declare individually any interests they may have in the items on the agenda. Councillors should consult Meetings General Procedure Rule 7 for full guidance on the registration and declaration of interests. However Councillors may wish to note the following:-

- Where a Councillor has a disclosable pecuniary interest, other pecuniary interest or a non-pecuniary interest in any business of the authority and he/she is present at a meeting of the authority at which the business is considered, the Councillor must disclose to that meeting the existence and nature of that interest, whether or not such interest is registered on his/her register of Interests or if he/she has made a pending notification.
- If a Councillor has a disclosable pecuniary interest in a matter being considered at a meeting, he/she must not participate in any discussion or vote on the matter at the meeting. The Councillor must withdraw from the room where the meeting is being held unless he/she has received a dispensation from the Monitoring Officer.
- Where a Councillor has another pecuniary interest in a matter being considered at a meeting and where the interest is one which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice the Councillor's judgement of the public interest, the Councillor must disclose the existence and nature of the interest and withdraw from the room where the meeting is being held unless he/she has received a dispensation from the Monitoring Officer.
- Failure to comply with the arrangements regarding disclosable pecuniary interests without reasonable excuse is a criminal offence, with a penalty of up to £5,000 and disqualification from office for up to 5 years.

5 **Have Your Say!**

a) The Chairman to invite members of the public to indicate if they wish to speak or present a petition at this meeting – either on an item on the agenda or on a general matter not on this agenda. You should indicate your wish to speak at this point if your name has not been noted by Council staff.

(b) The Chairman to invite contributions from members of the public who wish to Have Your Say! on a general matter not on this agenda.

6 **Minutes of the meeting on 20 August 2015**

7 - 14

To confirm as a correct record the minutes of the meeting held on 20

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|----|--|---------|
| 7 | Colchester Borough Travel to Work Patterns
See report by the Head of Commercial Services | 15 - 46 |
| 8 | Colchester's Archaeological Development Strategy
See report by the Head of Commercial Services | 47 - 74 |
| 9 | Draft Strategic Land Availability Assessment and Sustainability Appraisal / Garden Settlements Frameworks - Consultation Responses
See report by the Head of Commercial Services | 75 - 82 |
| 10 | Exclusion of the Public (not Scrutiny or Executive)
In accordance with Section 100A(4) of the Local Government Act 1972 to exclude the public, including the press, from the meeting so that any items containing exempt information (for example confidential personal, financial or legal advice), in Part B of this agenda (printed on yellow paper) can be decided. (Exempt information is defined in Section 100I and Schedule 12A of the Local Government Act 1972). | |

Part B

(not open to the public including the press)

Local Plan Committee

Thursday, 20 August 2015

Attendees: Councillor Elizabeth Blundell (Member), Councillor Andrew Ellis (Member), Councillor John Jowers (Group Spokesperson), Councillor Kim Naish (Group Spokesperson), Councillor Lyn Barton (Deputy Chairman), Councillor Martin Goss (Chairman), Councillor Gerard Oxford (Group Spokesperson), Councillor Christopher Arnold (Member), Councillor Barrie Cook (Member)

Substitutes: No substitutes were recorded at the meeting

44 Have Your Say!

Tony Barker addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He explained that he had taught at the University of Essex, undertaking research into Town and Country Planning. He was concerned about the quality of housing which would emerge from the forthcoming cycle of the Local Plan. He wished to urge the Committee to try hard to follow a Garden City or Garden Village design approach. He referred to the benefits of positive, rather than reactive, planning and the architecture and layout approach to policy, associated with the Essex Design Guide. He advocated the use of Architectural Layout principles, loosely described as the Garden City/Village, explaining that Developers were open to strong design principles in order to avoid appeals, whilst appeal Inspectors also had a duty to follow policies, both national and local. He was aware the Council would need to make difficult decisions around allocations and, if the design quality is of merit, the decisions will be seen as being of long term benefit for the Borough.

Councillor Cope attended and, with the consent of the Chairman addressed the Committee. He referred to the Irvine Road Orchard site, a designated area of open space in the Local Plan which had been the subject of a submission by the owner in relation to the Council's Call for Sites exercise. He was of the view that the site should not be considered by the Committee within the Call for Sites process on the grounds that the orchard was over 100 years old with large ecological and historical significance, it was an important local space for wildlife and it also provided local children with an outside resource. He referred to 300 objections on the Council's website and a petition containing 400 signatures. His view was that there was no good reason for the designation of the site to be changed and, on behalf of the local community and the Irvine Road Residents Association, he urged the Committee to reject it for inclusion in the Call for Sites process.

The Chairman thanked Mr Barker and Councillor Cope for their representations. He explained to Councillor Cope that the Committee was obliged to follow the due statutory process for the assessment of all Call for Sites submissions and, as such, it was not open to the Committee to reject any sites until that assessment had been completed.

45 Minutes of 27 May 15

The minutes of the meeting held on 27 May 2015 were confirmed as a correct record.

46 Minutes of 8 June 2015

The minutes of the meeting held on 8 June 2015 were confirmed as a correct record.

47 Update on the new Local Plan

Councillor Jowers (in respect of his membership of the Essex County Council Development and Regulation Committee and his former membership of the East of England Local Plan Panel) declared a non-pecuniary interest in this item pursuant to the provisions of Meetings General Procedure Rule 7(5).

The Committee considered a report by the Head of Commercial Services giving details of the progress made on preparation of Preferred Options for the new Local Plan.

Laura Chase, Planning Policy Manager, presented the report and, together with Karen Syrett, Place Strategy Manager, responded to Councillors questions.

Laura explained that the Council was in the process of preparing a Preferred Options version of a new Local Plan which, once adopted, would set out the growth strategy, planning policies and land allocations for the Borough to 2032 and beyond. At the meeting of the Committee in June a report had been considered on the outcome of the Issues and Options consultation on what the Local Plan should contain and the report highlighted progress on these issues in terms of:

- Agreement on the plan's vision and objectives – workshops involving key public and private sector service delivery and infrastructure providers were to be held in September
- Development of realistic housing and employment targets for the provision of a 15-year housing land supply - the Council, working in partnership with Braintree, Chelmsford and Tendring Councils, had commissioned Peter Brett Associates to undertake assessments for the period up to 2037 to determine the levels of 'objectively assessed need' (OAN), being the total number of net additional dwellings to be provided over the plan period, both in the market and affordable sectors. The completed report had been made available on the Council's website
- Sustainability Appraisal and evaluation of potential development sites, and preparation of a Strategic Housing and Employment Land Availability Assessment - Call for Sites suggestions were being assessed in terms of suitability, availability

and achievability to determine which sites would be deliverable over the plan period

- Completion of a range of evidence base work needed to inform policies and allocations, including Environmental Audits, Local Wildlife Sites study, Strategic Flood Risk Assessment, work on archaeology and a Water Cycle Study update
- A Settlement Boundary Review including meetings with larger Parish Councils where there is potential for proportionate growth
- Development of draft spatial strategy and associated policies and site allocations

The OAN study undertaken by Peter Brett Associates made the following key observations about the Colchester housing market:

- Housing delivery in Colchester held up relatively well in the recession. In the reference period on which the official demographic projections were based, delivery fell below targets but not as fast as other areas. There was also a supply of land available should the market be willing to deliver more new homes, so there was no evidence of undersupply.
- Long-term changes in house prices closely followed the regional trend for the East of England. Since 2007 all other comparator areas outperformed Colchester (Essex, East of England, England)
- Colchester had relatively good affordability when compared to county and regional benchmarks.
- The OAN for Colchester was 920 new homes a year. This figure would serve as the baseline for determining housing targets in the emerging local plan for Colchester.

In discussion, Members of the Committee commented, in particular, in relation to:

- The work being done to identify the infrastructure requirements necessary to support new development
- The wide ranging factors which needed to be considered for a Garden City/Village approach
- The implications, particularly in employment terms, for Colchester in relation to recently announced funding for an additional third lane to the A12 between Chelmsford and Colchester
- The assessed housing need total of 920 per year was considered lower than previously anticipated and, as such, may take the pressure off the smaller rural areas
- The benefits to be gained from applying high standards of design in order to raise the quality of housing being built for the future
- The importance of retaining employment opportunities locally if the preference was for Colchester to not become another London dormitory town and, in this context, the implications of encouraging the use of 'brownfield' sites for housing development
- The benefits of having a Urban Green Link policy in terms of the protection of wildlife migration corridors
- Clarification regarding the current percentages of Colchester workforce commuting to London and those working locally
- The creative sector had previously been identified as the fastest growing employment sector and whether this continued to be the case

- The need for affordable housing in the town was continuing due to reduction in the number of affordable houses being delivered through the planning process
- Potential locations for the provision of additional travellers sites would need to be considered in the new Plan period
- Over a considerable period Colchester had consistently achieved the delivery of around 850 houses each year which indicated that an assessed need for 920 might be a target which was realistic for the Borough
- The implications for future housing need of the recent trend for major pension companies to make investments in buy to let property portfolios

In response to questions from the Committee members, it was explained that:

- An infrastructure delivery plan was being prepared and meetings would be taking place with transport and utilities providers to identify gaps and requirements
- Colchester had a good record in terms of employment provision locally, but it was usually considered more difficult to set job growth targets as opposed to housing targets. Additionally, this was affected by the changes taking place in the way and places that people worked and the location and type of employment land being utilised
- Consideration of the Garden City/Village principles was welcomed but would need to be undertaken beyond the scope of the current plan period
- The assessed need figure of 920 per year from the Peter Brett Associates report was subject to further work and potential change
- There was a particular size of settlement which was associated with a true Garden City but the standards associated with a Garden City were ones which would benefit all sized developments
- The principle to protect green links was supported and encouraged by officers but assistance and input from local community members in identifying such links was particularly helpful in protecting local wildlife
- The employment land needs assessment had included the creative sector within those employment sectors considered to be 'vibrant and developing'
- The percentage of people who lived and worked in the Borough had been calculated as 71% in the 2001 census whilst the Travel to Work Patterns document, published in September 2014, and based on the 2011 census indicated that 69% of employed Colchester residents worked in the Borough with 25k leaving the Borough to work, 25% of whom travelled to London.

RESOLVED that the update on the progress of the process of preparing a new Local Plan for the Borough be noted.

48 Sports Facility Strategy

Councillor Naish (in respect of his membership of the Angling Trust East of England Freshwater Forum, Environment Agency and Paxman's Angling Club) declared a non-pecuniary interest in this item pursuant to the provisions of Meetings General Procedure Rule 7(5).

Councillor Cook (in respect of his membership of the West End Bowls Club) declared a non-pecuniary interest in this item pursuant to the provisions of

Meetings General Procedure Rule 7(5).

The Committee considered a report by the Head of Commercial Services giving details of the findings of the Sports Facility Strategy carried out on behalf of the Council by Knight, Kavanagh and Page (KKP).

Karen Syrett, Place Strategy Manager, presented the report, responded to questions and assisted the members in their discussions. She explained that a new Sports Facilities Strategy was required by the Council to provide evidence about sport and leisure need to inform the emerging Local Plan for Colchester to 2032. The Strategy would also enable the Council to plan and manage the future delivery of sport and leisure at its own facilities. Knight Kavanagh and Page, a Sport England approved consultancy, had been appointed in February 2014 to prepare the Strategy in consultation with a wide range of stakeholders.

A full audit of existing indoor and outdoor facilities was undertaken to identify current levels of provision which enabled separate Needs Assessments to be published, using 2011 Census data, estimated housing growth figures and information on potential team generation rates for various sports. The Strategy identified key challenges, issues and priorities for:

- Indoor Facilities including sports halls, swimming pools, health and fitness clubs, cycling, squash, indoor bowls and water sports.
- Playing Pitches for football, rugby, hockey, cricket, tennis, bowls and athletics.

In discussion members of the Committee referred to:

- The Strategy including no references to angling facilities in the Borough, bearing in mind the numbers of people who participated in fishing activities, the recognised beneficial effects for participants and the recent restriction of access to the River Colne in Castle Park which had provided welcome facilities for the disabled
- The need to consider how schools can continue to be made available for wider community use and for that use to be protected over time, an arrangement which wasn't always the case in respect of private finance projects
- The lack of sporting facilities in the outlying towns and villages in the Borough such as Tiptree, Wivenhoe and West Mersea
- The need for additional swimming provision to be considered for a town the size of Colchester

Karen responded to individual questions as follows:

- The Strategy had not been intended to include each individual sport, rather it had concentrated on indoor facilities and playing pitch sports as these were the activities which had a strong evidence base to address unmet need
- The background documents to the report had been published on the website and these contained much more detailed information about the work undertaken

across the whole of the Borough, together with identifying areas of under-supply

RESOLVED that the findings of the Sports Facility Strategy carried out on behalf of the Council by Knight, Kavanagh and Page be noted.

49 Rural Exception Site Policy // Recent Experience

Councillor Jowers (in respect of his Vice Presidency of the Rural Community Council of Essex) declared a non-pecuniary interest in this item pursuant to the provisions of Meetings General Procedure Rule 7(5).

Councillor Sykes (in respect of her Trusteeship of the Rosemary Almshouse Charity) declared a non-pecuniary interest in this item pursuant to the provisions of Meetings General Procedure Rule 7(5).

Michael Siggs, on behalf of the Rosemary Almshouse Charity, addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He also circulated background information and a location plan in relation to the Rosemary Almshouses in London Road, Stanway. He explained that he had undertaken discussions with officers from the Council with a view to obtaining rural exception site status for the Almshouses and that, in order to progress the issue, he had been asked to provide evidence of need for older people's accommodation in Stanway. He considered there was a definite need for housing for older people and particularly for independent living accommodation for older people. He was of the view that homes were becoming unaffordable which was creating problems for people trying to find homes in which to live. As a consequence, he was proposing, in partnership with a Care Agency, the building of approximately 24 units of Lifetime Homes on the Rosemary Almshouse site which would provide additional care related options for Almshouse residents for the future.

Councillor Sykes attended and, with the consent of the Chairman addressed the Committee. She supported the proposals presented by Mr Siggs and referred to the Stanway Parish Plan which had identified the need for affordable homes in Stanway. The Almshouse properties provided excellent housing for the community but needed to be brought up to date. The proposal being put forward by the Trustees was for the provision of supported homes at a reduced cost for residents who wanted to stay in Stanway.

The Committee considered a report by the Head of Commercial Services giving details of the Council's recent consideration of submissions under the new rural exception site policy. Eddie Bacon, Affordable Housing Development Officer presented the report and, together with Karen Syrett, Place Strategy Manager, assisted the Committee members in their discussions.


Eddie explained that the National Planning Policy Framework (NPPF) had introduced a change to Rural Exception Site (RES) policy by allowing the development of an appropriate number of open market sale homes to be built on RES in order to cross

subsidise the cost of providing affordable homes. As a consequence of this change two Rural Exception Sites had been granted planning permission in 2014/15, one in Dedham and one in Messing. Both schemes were submitted with viability appraisals to demonstrate that the market homes proposed were required to cross subsidise the provision of the affordable homes and the appraisals were reviewed by independent cost consultants to verify the figures. Planning Officers had reported their experience on both Rural Exception Sites had been positive, with good working relationships between all parties and the well-designed schemes proposed. It had also been beneficial having the support of relevant Parish Councils and ward Councillors. Accordingly, the two schemes had provided a template for taking forward further Rural Exception Schemes in other villages.

Councillor Ellis explained his own role in relation to the site at Messing and how working in collaboration with Karen Syrett and her team had assisted in delivering such a successful scheme. Members of the Committee welcomed the information contained in the report which demonstrated what could be achieved where there was support from the various stakeholders. Members also requested that the information be made available to Parish Councils in the Borough.

RESOLVED that the information relating to the recent applications under the Rural Exceptions Site Policy be noted and arrangements be made to circulate this to local Parish Clerks.

5 October 2015

Report of	Head of Commercial Services	Author	Paul Wilkinson
Title	Colchester Borough Travel to Work Patterns Report		 282787
Wards affected	All wards		

The Local Plan Committee is asked to note the findings of the 2011 Census Colchester Borough Travel to Work Patterns Report

1. Decision(s) Required

- 1.1 The Local Plan Committee is requested to note the findings of the 2011 Census Colchester Borough Travel to Work Patterns Report.

2. Reasons for Decision(s)

- 2.1 To ensure the Committee is aware of the evidence base being gathered to inform development of the new Local Plan.

3. Alternative Options

- 3.1 None - the Council must demonstrate its policies are based on a robust evidence base.

4. Supporting Information

- 4.1 Planning Practice Guidance suggests it is important for Local Planning Authorities to undertake an assessment of transport implications in developing or reviewing their Local Plan. Analysis of the 2011 Census helps inform the baseline and provides an understanding of existing travel to work patterns.
- 4.2 The document is attached as an appendix to this report and is available on the Colchester Borough Council website in the Local Plan evidence base. A presentation will be given at the meeting.
- 4.3 The report is split into the following parts:
- An Introduction with key messages and an overview at the borough level.
 - A series of illustrated pages giving information on Borough wide findings, Rural work place zones, Urban work place zones and Journeys from Tendring. The pie charts illustrate the modal split; the table sets out the volume of movement from one zone to another zone and the map illustrates the main movements.
- 4.4 The Census asks the following questions from which the data is drawn:
- “How do you usually travel to work? Tick the box for the longest part, by distance, of your usual journey to work”
 - “In your main job, what is the address of your workplace?”

- 4.5 These questions have their limitations e.g. “how” - only picks up longest mode, “where” - only allows for the final destination and for only one job. Trips for education, shopping and leisure activities are not recorded. Without undertaking local surveys the Census is the best source of data freely available on travel to work patterns.

Travel to work in Colchester

- 4.6 The document includes an overall summary for the Borough and information on each Travel to Work place zone. In most cases these work place zones are similar to electoral wards. In a small number of cases electoral wards have been split in two or merged with neighbouring wards. A new answer was included in the 2011 census for travel to work - “no fixed place”. This makes comparison with previous census more difficult and also determining how many people live and work locally. 7,176 of employed residents answered “no fixed place”.
- 4.7 Key Figures from the 2011 Census for Colchester are:
- 109,043 work related trips per day across the Borough
 - 86,075 employed people live in the Borough (inc “no fixed place”)
 - 54,058 (69%) people live and work in the Borough (exc “no fixed place”)
 - 24,850 leave the Borough for work
 - 22,968 people come into the Borough to work
 - 7,176 have “no fixed place” of work

5. Proposals and Findings

- 5.1 It is proposed that the findings of the Colchester Travel to Work Patterns be noted by the Committee.

6. Strategic Plan References

- 6.1 This research helps to deliver the following themes of the 2015-2018 Strategic Plan:

Vibrant - promoting our heritage and working hard to shape our future – this work helps develop the local plan.

Prosperous - generating opportunities for growth and supporting infrastructure – this research helps understand the pressure on the existing infrastructure and where there are potential opportunities.

7. Publicity Considerations

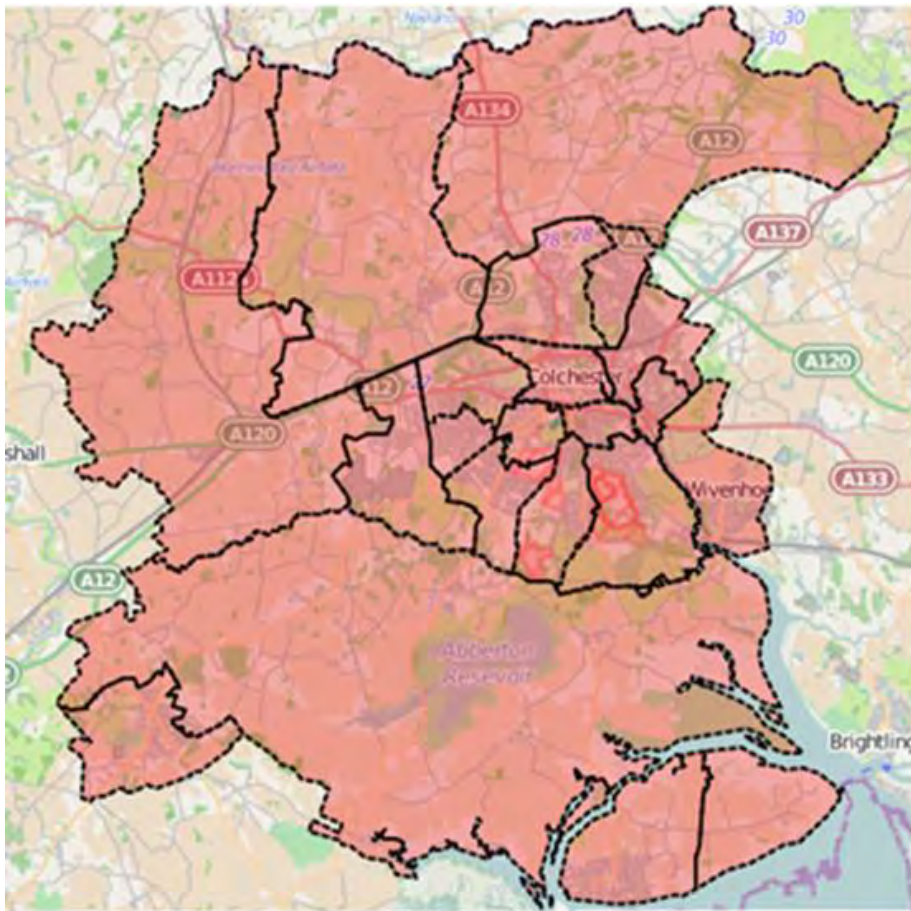
- 7.1 Press interest on travel to work issues was demonstrated by media coverage on the topic following the last Local Plan Committee. This report will highlight the Council's comprehensive information on the topic.

8 Standard References

- 8.1 There are no particular references consultation considerations; or financial; equality, diversity and human rights; community safety; health and safety or risk management implications.

Colchester Borough travel to work patterns

Where & how people travel to work by workplace zone



September 2015

Adapted from data from the Office for National Statistics licensed under the Open Government Licence v.1.0.

Data taken from Census 2011 WU03EW dataset

Introduction

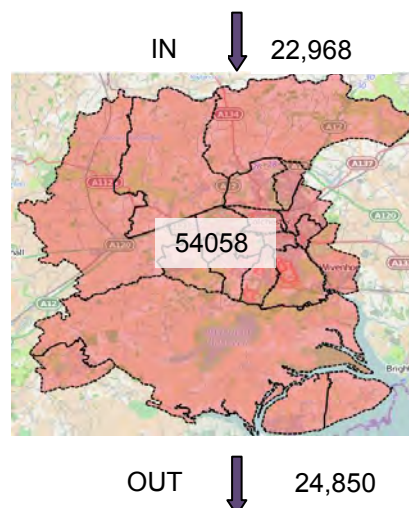
This document is a study into the travel patterns of the employees of the Colchester Borough and is based on the ONS Census 2011 'WU03EW location of usual residence and place of work by method of travel to work (MSOA level)' dataset.

The document is in four sections- the Borough as a whole, rural work place zones, urban work place zones, and a separate section for Tendring District given the high percentage of workers who commute to Colchester (38%) from Tendring.

This document looks at workplace zones as these were a new output geography introduced in the 2011 Census. They were used by the Census as they were deemed more suitable for disseminating workplace based statistics and outputs. Workplace zones were created by splitting and merging the 2011 output areas to produce a workplace geography that contains consistent numbers of workers. This means in Colchester that some electoral wards have been split or merged in a particular workplace zone.

Key messages:

- There are a total of 109,043 work related trips per day within, to or out the Borough.
- There are 86,075 employed residents in the borough who either work within or outside the Borough.
- 54058 (69%) of employed residents stay in the Borough (from any workplace zone in Colchester to any workplace zone in Colchester).
- 7167 (8%) of employed residents have no fixed place of work.
- 24850 of employed residents leave the Borough- of these 25% go to Greater London (11% to the City of London and 14% to rest of London), 15% to Tendring District, 15% to Braintree District and 10% to Chelmsford City.
- 139 employed residents work outside the UK and 110 employed residents work off-shore.
- 22968 people come into the Borough for work - of these 38% come from Tendring District, 16% from Braintree District and 11% from Babergh District.
- Colchester is a net exporter of 1882 employees.
- For each workplace zone, a very high percentage of journeys in total are to 'other' destinations.



Workplace zones within the Borough

- In 7 out of 20 workplace zones the highest amount of work journeys start and finish within the zone. This number rises to 14 out of 20 workplace zones when those who work at home are added to those who work and live in the same workplace zone.
- The most important destination for employment is Castle ward (Town Centre) which appears in the top 3 destinations for 18 out of 20 workplace zones.
- Across the Borough 10% of employed residents work at home.
 - 15% of employed residents work at home in rural workplace zones.
 - 8% of employed residents work at home in urban workplace zones
- The car dominates the mode of transport to work representing 55% of all journeys in the Borough.
 - The average for journeys by car to work is 62% in rural workplace zones.
 - The average for journeys by car to work is 53% in urban workplace zones.
- Being a passenger in a car has a modal share of 5% across Colchester Borough. This added to the 55% who drive to work by car means that 60% of employed residents across the Borough travel to work by car.
- Cycling represents 4% of employed resident's choice of transport to work.
 - Cycling has a higher average in urban workplace zones at 5% compared to 2% in rural areas.
- Bus has a 6% modal share across Colchester Borough.
 - St. Andrew's has the highest bus use with 12% of employed residents travelling by bus to work.
- 12% of employed residents go 'on foot' to work in the Borough.
 - 6% go on foot to work in rural workplace zones.
 - 14% go on foot to work in urban workplace zones with Castle and New Town having the highest 'on foot' share at 25% and 28% respectively.
- Mile End continues to have the highest level of employed residents travelling to work by train at 18%.

Tendring

- Castle is the most popular destination for those travelling from Tendring for work with 27% travelling to Castle. The next two top destinations are Highwoods (15%) and Mile End (12%).
- 82% of those who travel into Colchester Borough from Tendring travel by car. This number rises to 87% when including those who travel to Colchester Borough by being a passenger in a car.

Conclusion:

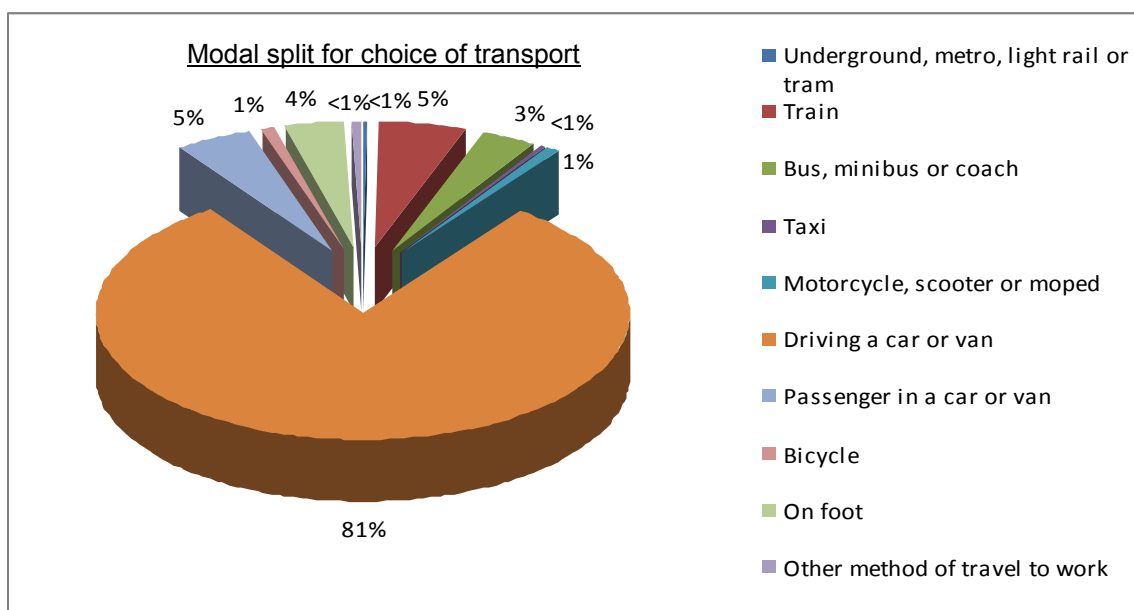
There is a high level of 'local labour market self-containment' with 69% of people living and working locally in Colchester Borough. This indicates that Colchester is not overly reliant on other towns and cities for employment, and in particular, Castle

(town centre) has continued to remain a major employment centre. When employed residents do travel to work outside the Borough, Greater London is the most popular destination.

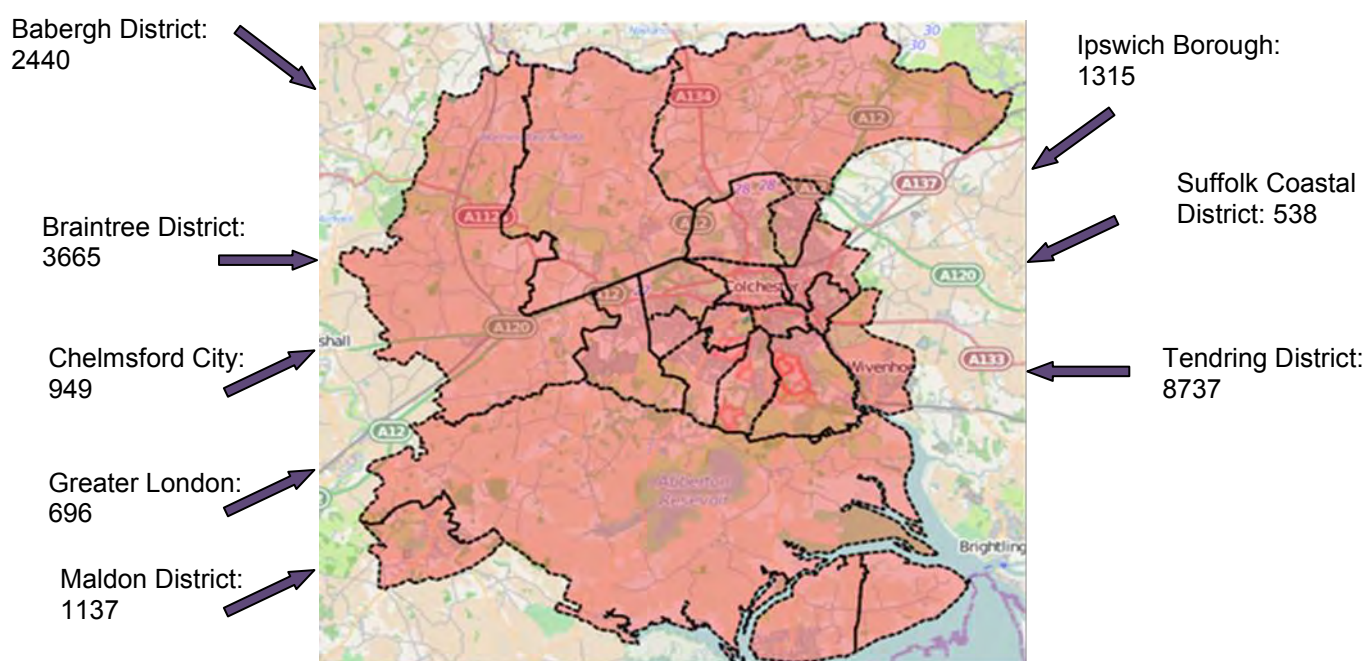
The car continues to be the most popular form of transport to work (55%) although there seems to be a rural/urban split in choice of transport. There is a higher percentage of those in urban work place zones opting for more sustainable travel to work such as by foot or cycling in comparison to rural work place zones.

The distribution of trips to work is large and varied. In most instances, “other location” is the most significant and this is made up of a large number of small individual destinations creating complex trip patterns.

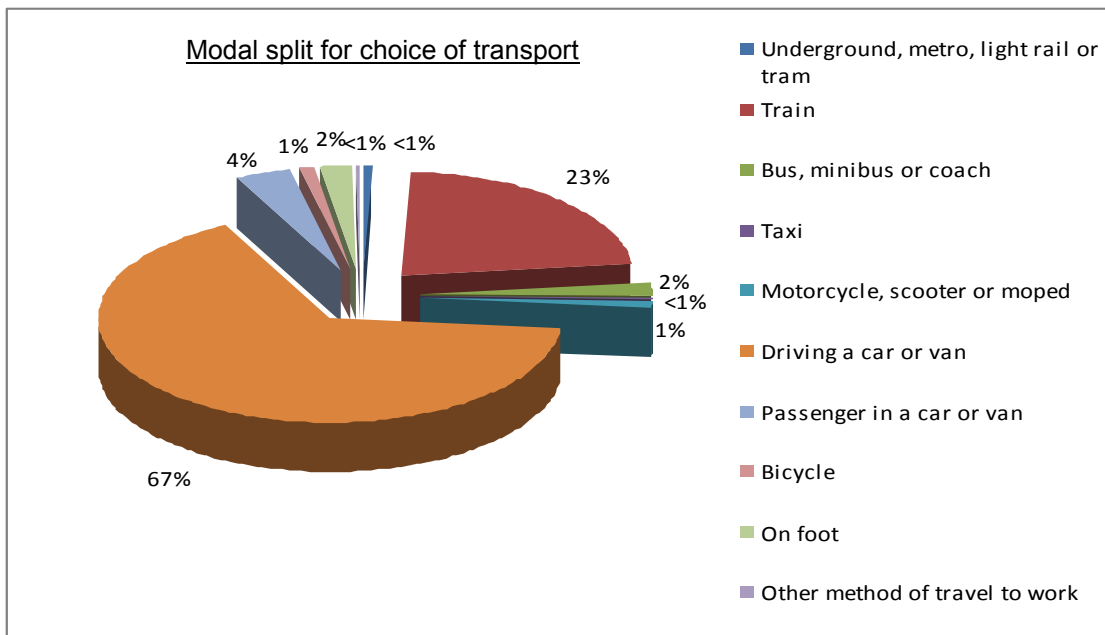
Journeys into Colchester Borough



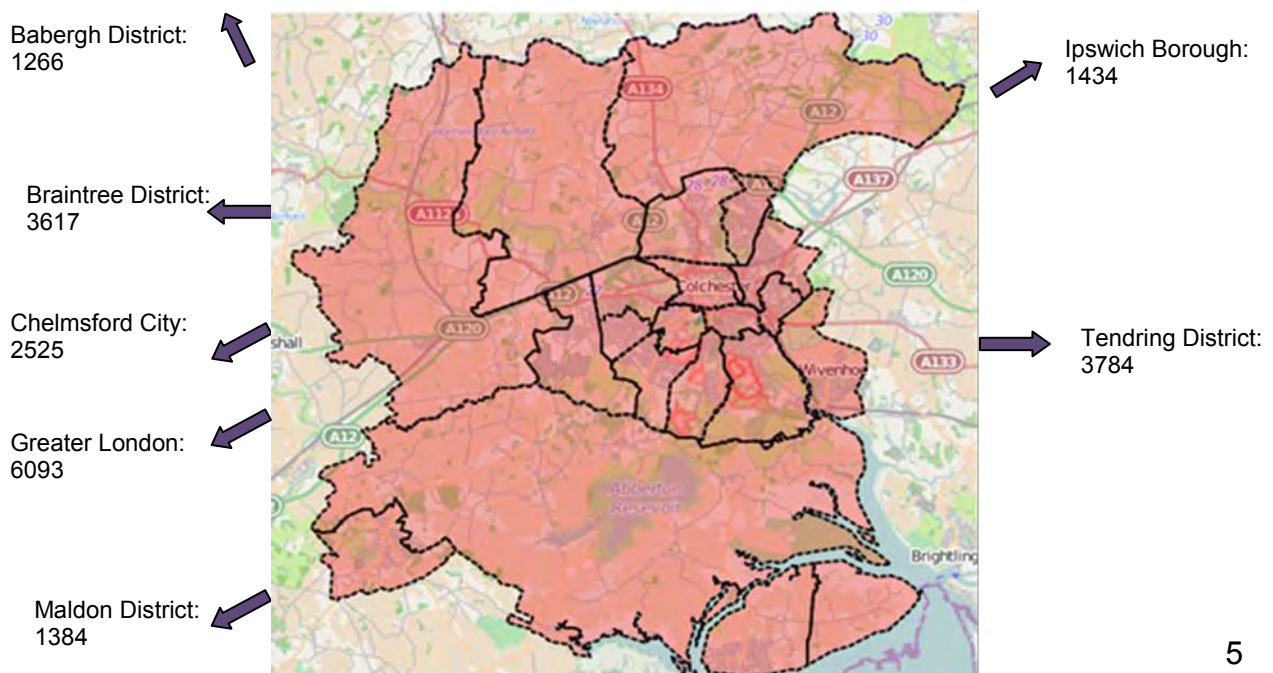
From:	To:	Colchester	%
Tendring District		8737	38
Braintree District		3665	16
Babergh District		2440	11
Ipswich Borough		1315	6
Maldon District		1137	5
Chelmsford City		949	4
Greater London		696	3
Suffolk Coastal District		538	2
Other Locations		3559	15
Total		23036	100



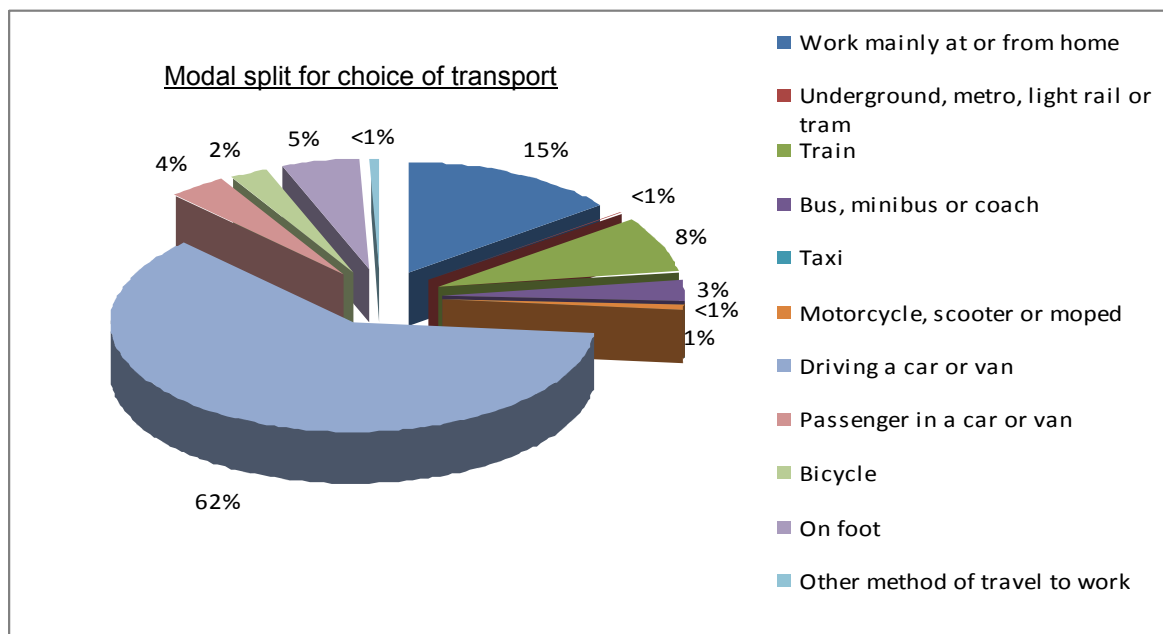
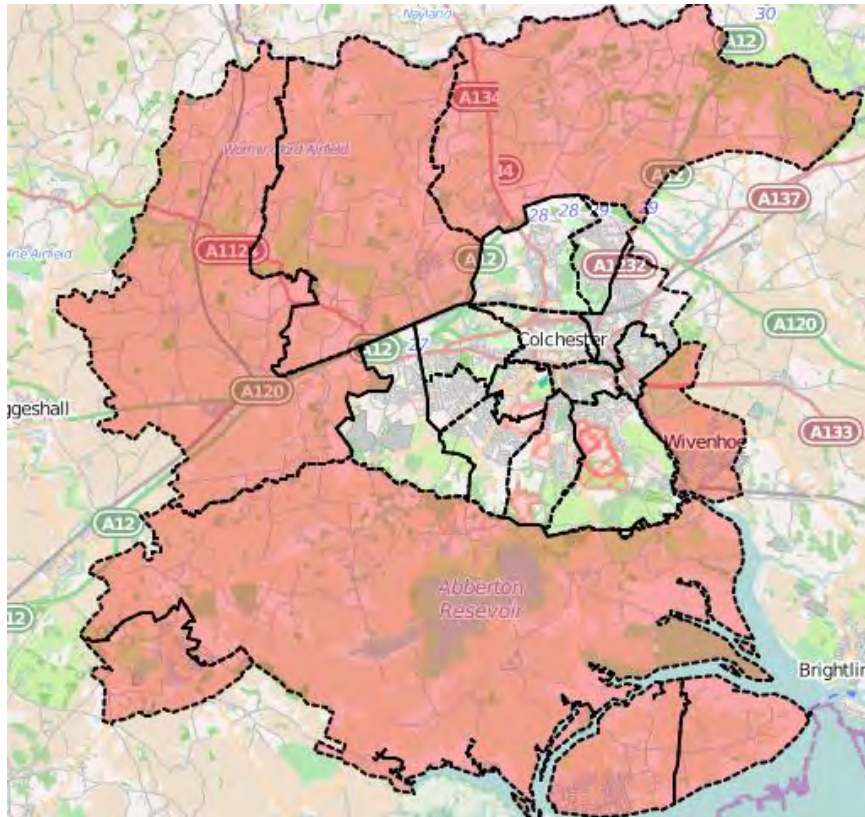
Journeys out of Colchester Borough



To:	From:	Colchester	%
Greater London		6093	25
Tendring District		3784	15
Braintree District		3617	15
Chelmsford City		2525	10
Ipswich Borough		1434	6
Maldon District		1384	6
Babergh District		1266	5
Other Locations		4747	19
Total		24850	100

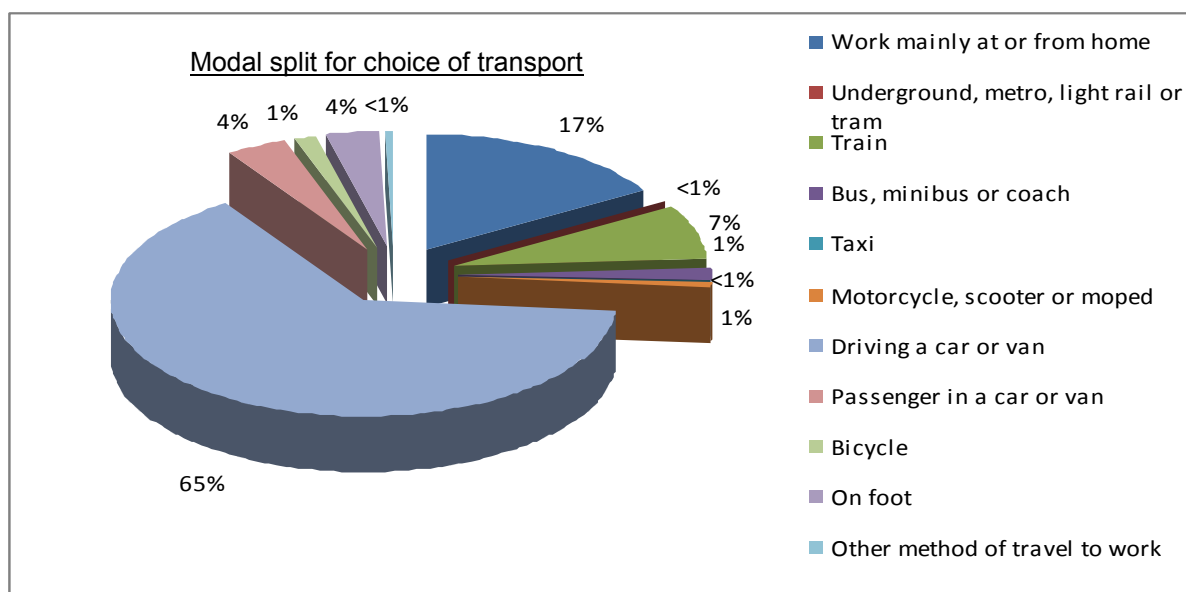


Rural workplace zones

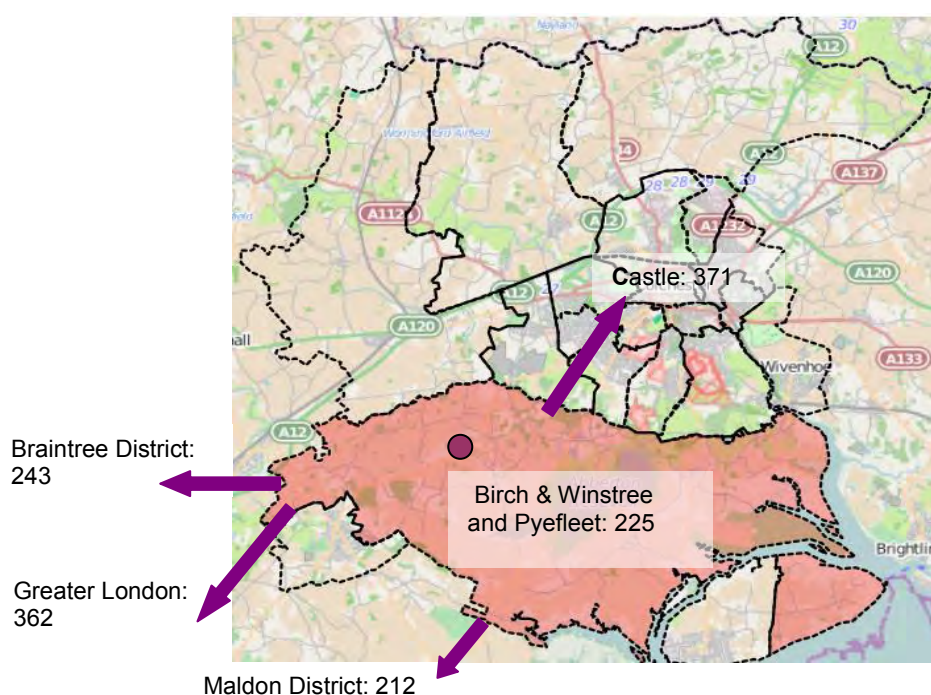


Birch & Winstree and Pyefleet

Work place zone 19

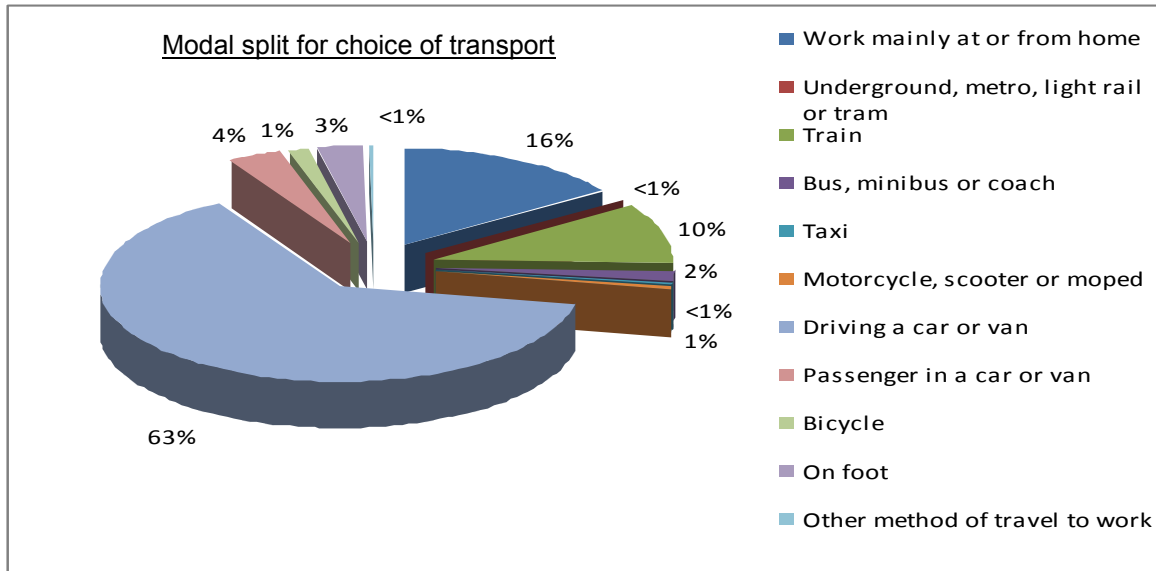


To:	From:	Birch & Winstree and Pyefleet	%
Castle		371	9
Greater London		362	8
Braintree District		243	6
Birch & Winstree and Pyefleet		225	5
Maldon District		212	5
No fixed workplace		432	10
Other Locations		1742	41
No journey		705	16
Total		4292	100

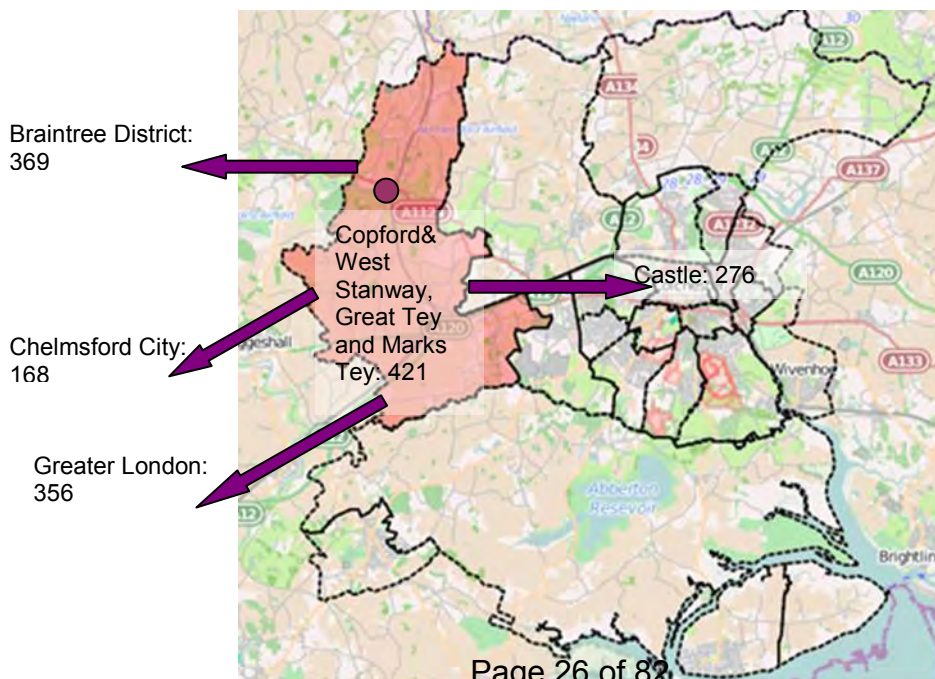


Copford and West Stanway, Great Tey and Marks Tey

Work place zone 10

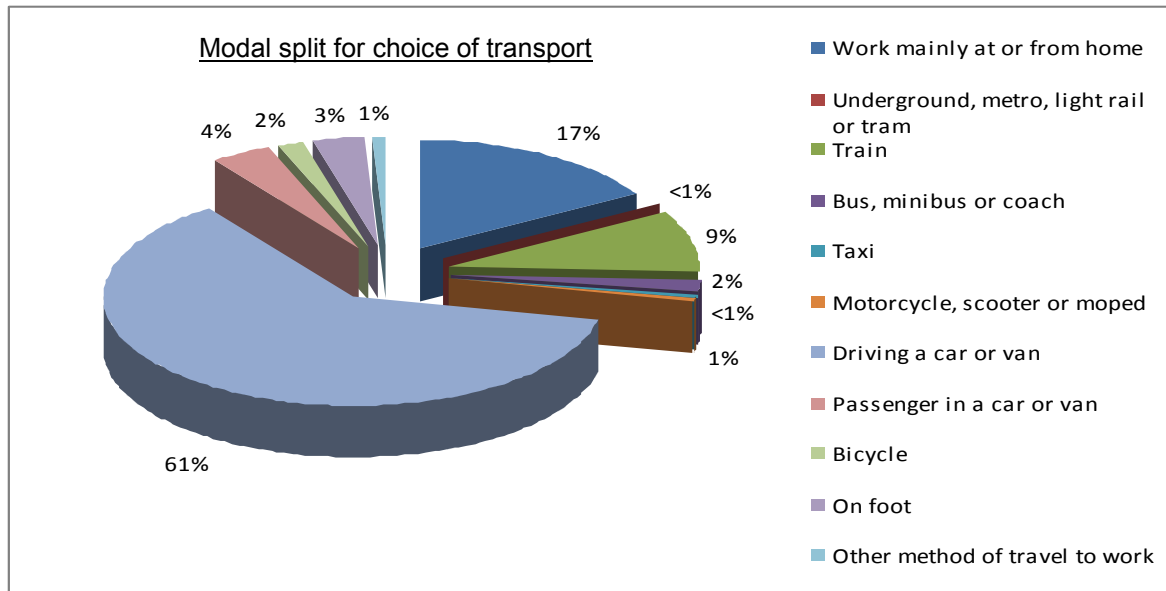


From:	Copford & West Stanway, Great Tey and Marks Tey	%
To:		
Copford & West Stanway, Great Tey and Marks Tey	421	11
Braintree District	369	10
Greater London	356	10
Castle	276	7
Chelmsford City	168	4
No fixed workplace	337	9
Other Locations	1236	33
No journey	581	16
Total	3744	100

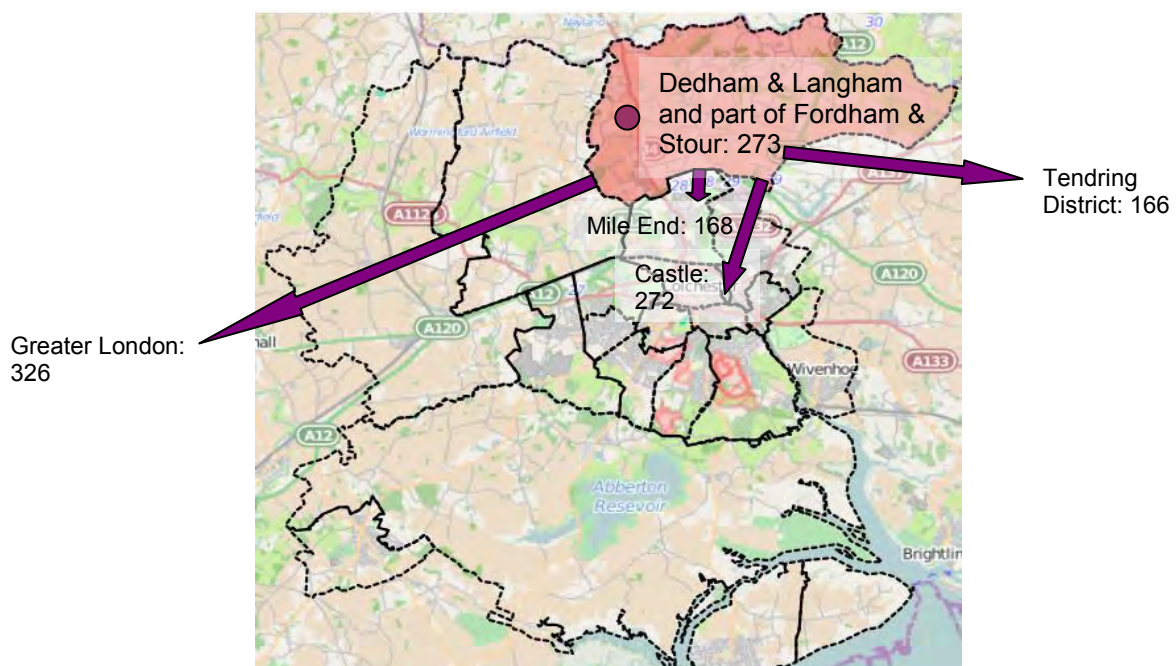


Dedham & Langham and part of Fordham & Stour ward

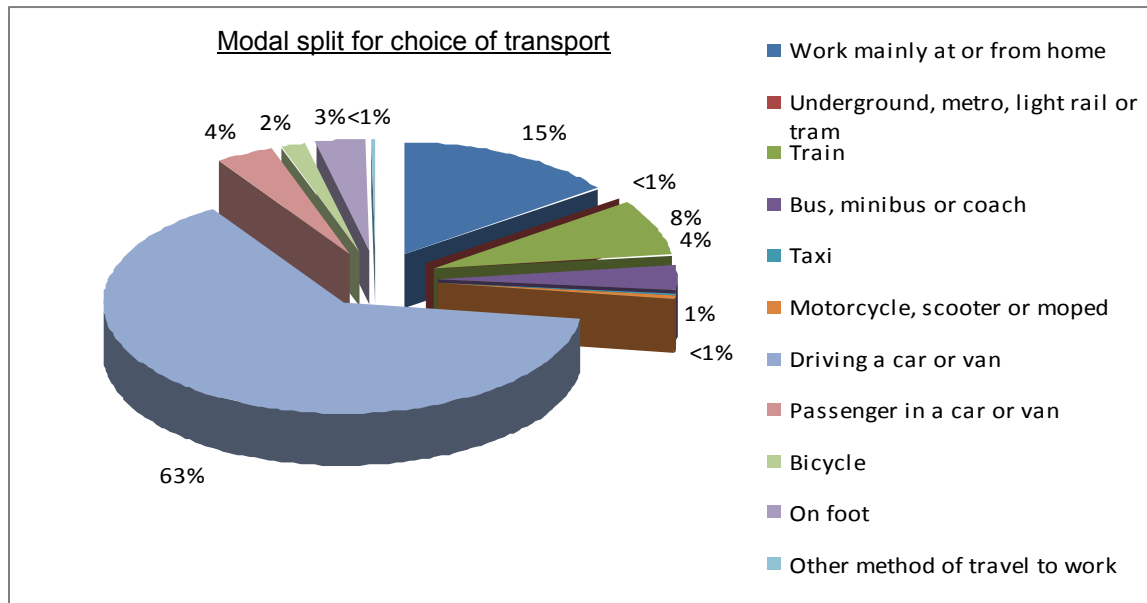
Workplace zone 1



From:	Dedham & Langham and some Fordham & Stour	%
To:		
Greater London	326	11
Dedham & Langham and some Fordham & Stour	273	10
Castle	272	10
Mile End	168	6
Tendring District	166	6
No fixed workplace	312	11
Other Locations	737	26
No journey	557	20
Total	2811	100



Part of Fordham & Stour ward and West Bergholt & Eight Ash Green Workplace zone 3

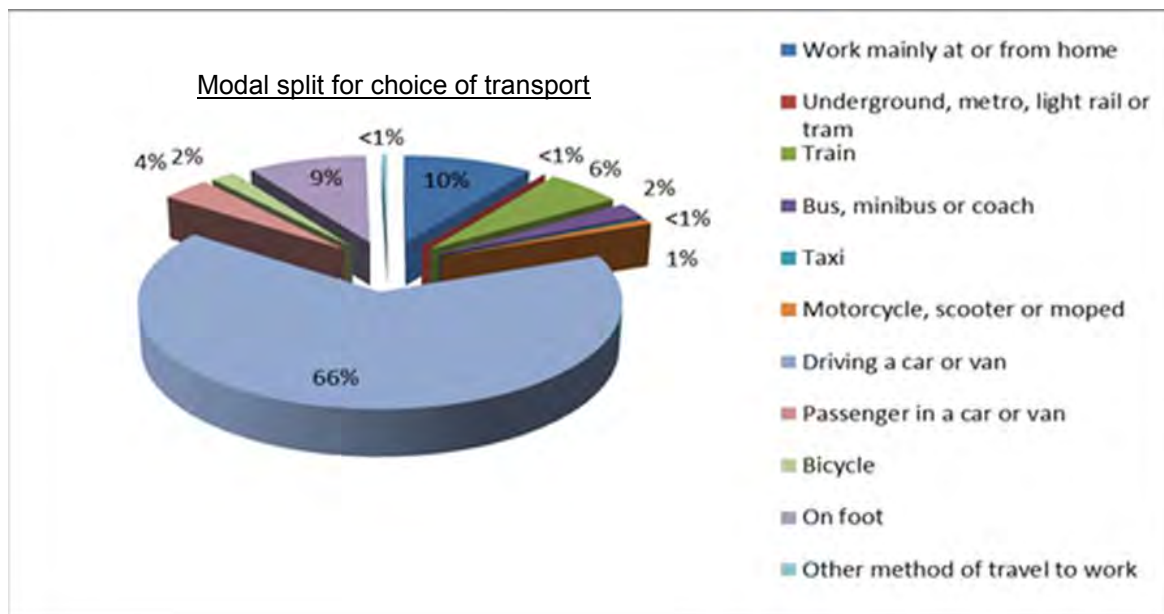


To:	From:	Fordham & Stour and West Bergholt & Eight Ash Green	%
Castle		342	10
Greater London		235	7
Fordham & Stour and West Bergholt & Eight Ash Green		203	6
Mile End		156	5
Braintree District		149	5
No fixed workplace		302	9
Other Locations		1421	43
No journey		492	15
Total		3300	100

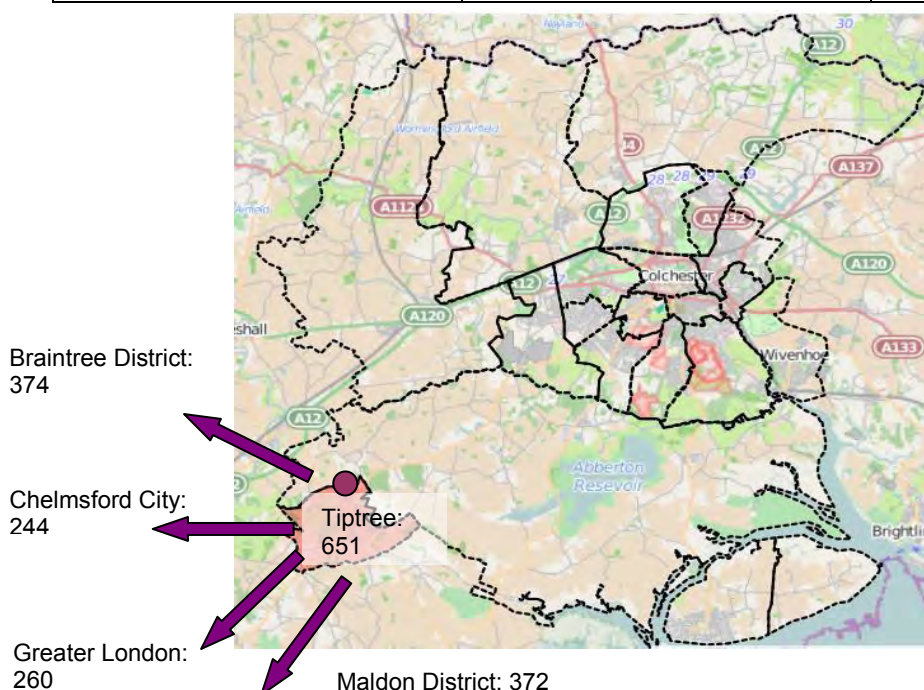


Tiptree

Workplace zone 20

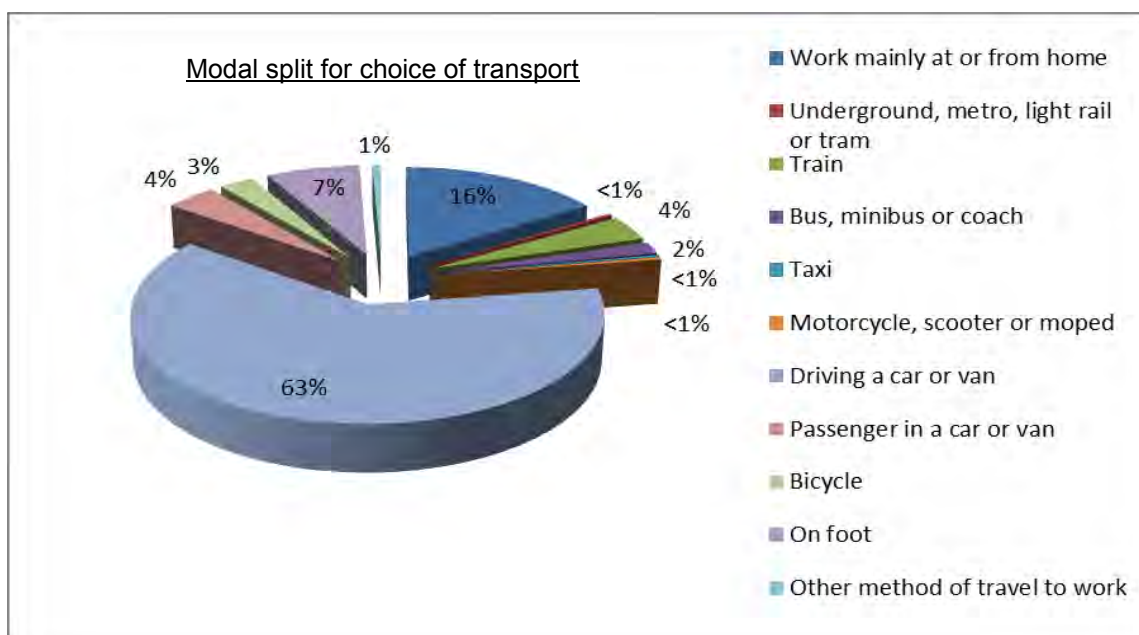


To:	From:	Tiptree	%
Tiptree		651	18
Braintree District		374	11
Maldon District		372	10
Greater London		260	7
Chelmsford City		244	7
No fixed workplace		369	10
Other Locations		983	27
No journey		361	10
Total		3614	100

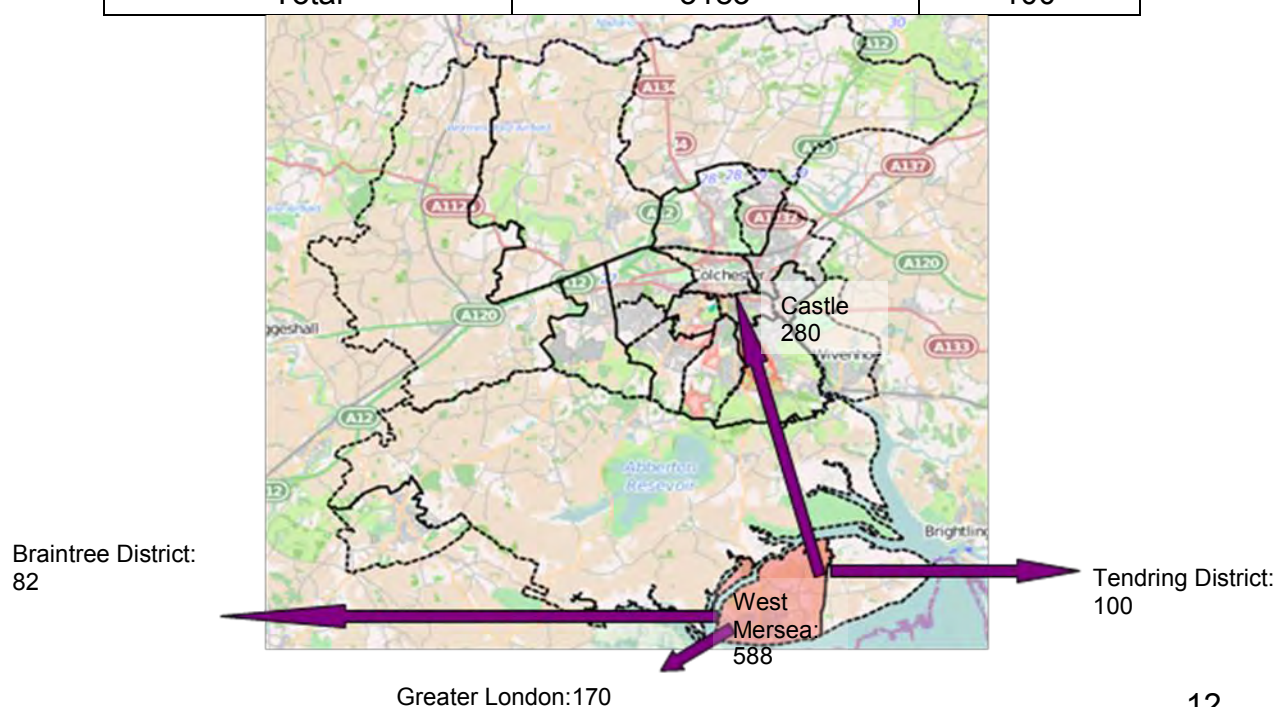


West Mersea

Workplace zone 21

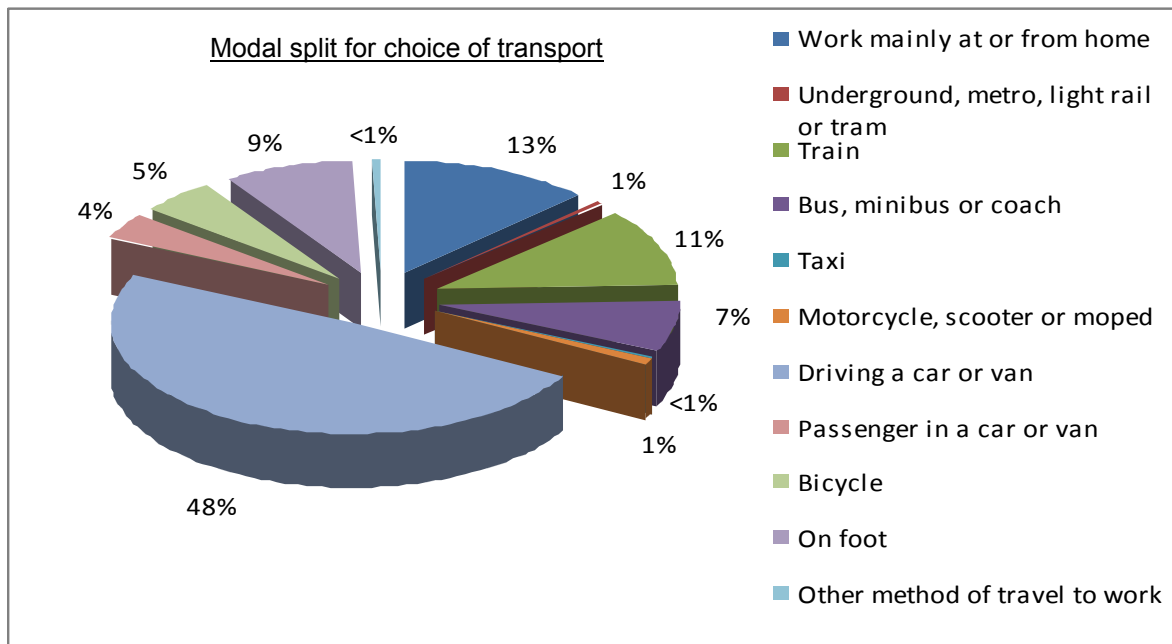


To:	From:	West Mersea	%
West Mersea		588	18
Castle		280	9
Greater London		170	5
Tendring District		100	3
Braintree District		82	3
No fixed workplace		358	11
Other Locations		1101	35
No journey		504	16
Total		3183	100



Wivenhoe Cross and Wivenhoe Quay

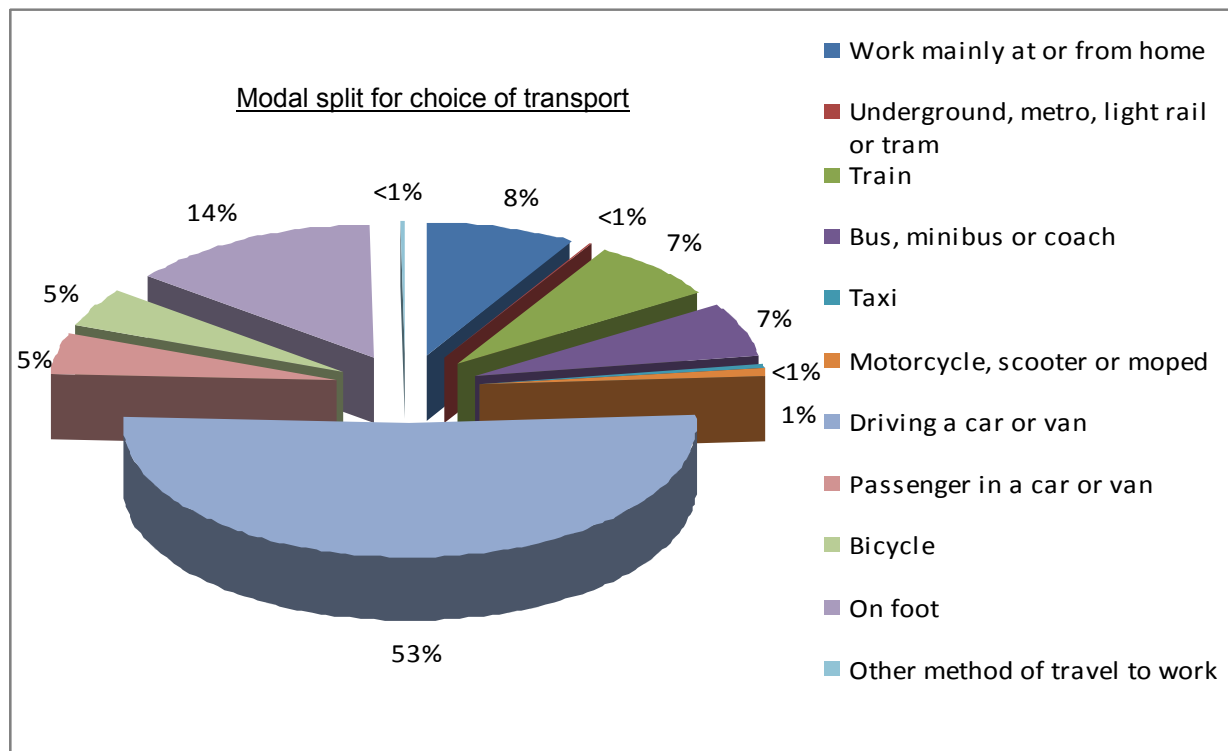
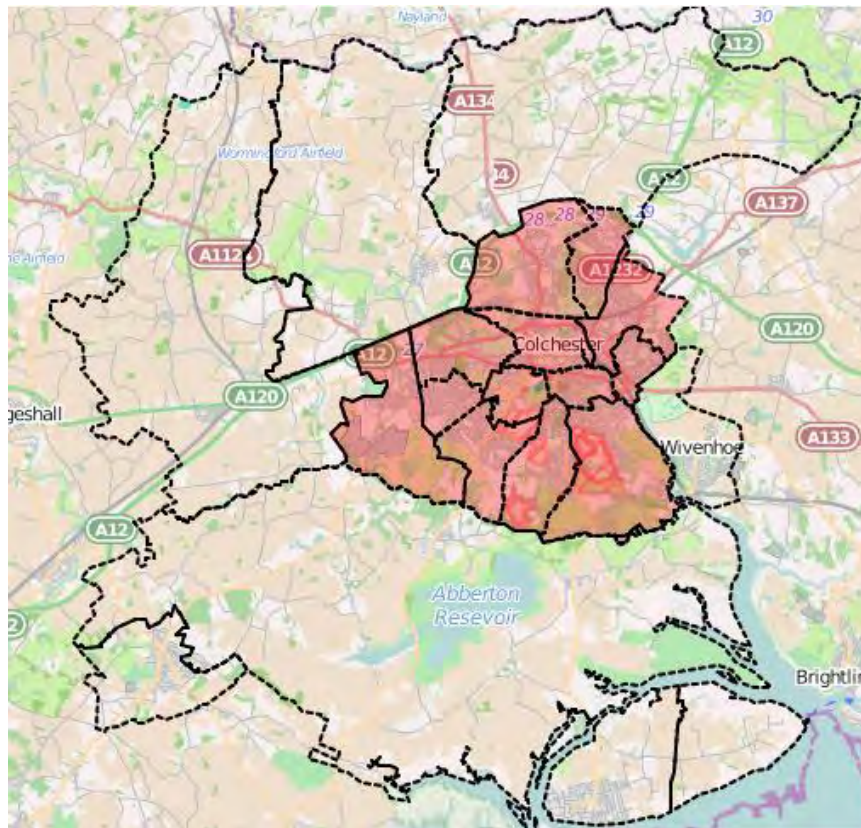
Workplace zone 17



To:	From:	Wivenhoe Cross and Wivenhoe Quay	%
Wivenhoe Cross and Wivenhoe Quay		732	18
Castle		468	11
Greater London		365	9
Tendring District		349	8
Mile End		146	4
No fixed workplace		326	8
Other Locations		1214	29
No journey		522	13
Total		4122	100

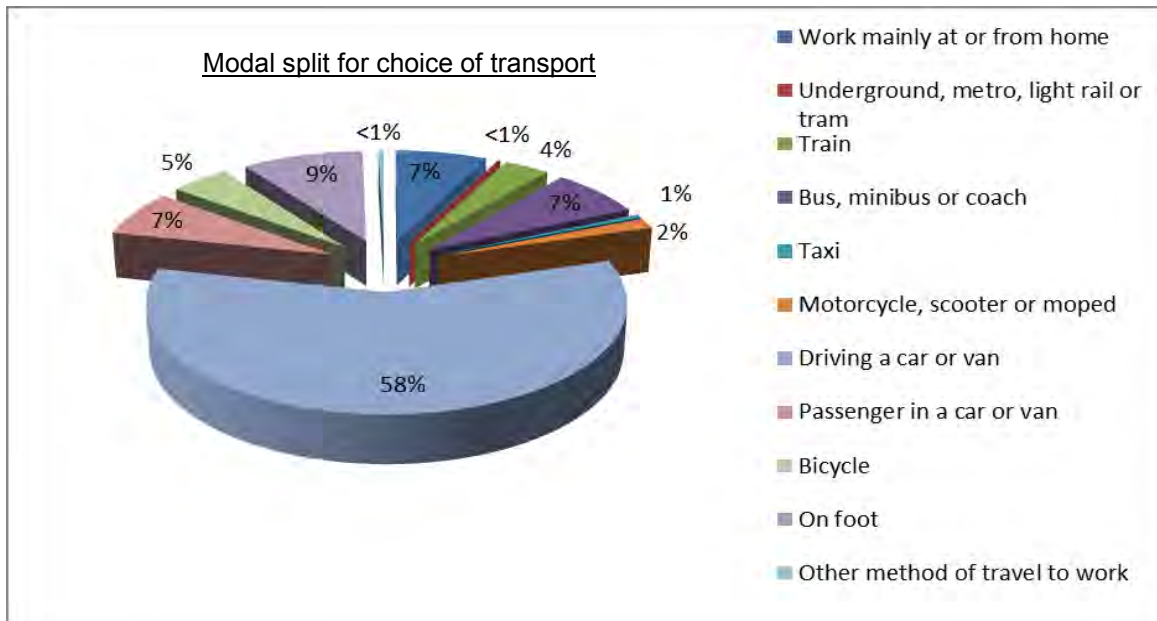


Urban workplace zones

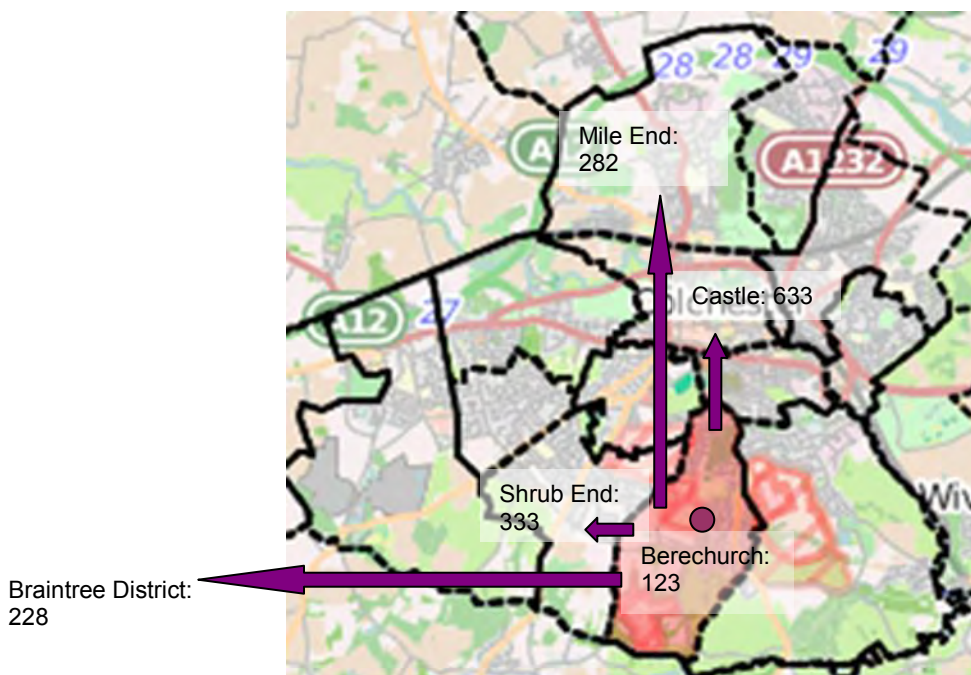


Berechurch

Workplace zone 18

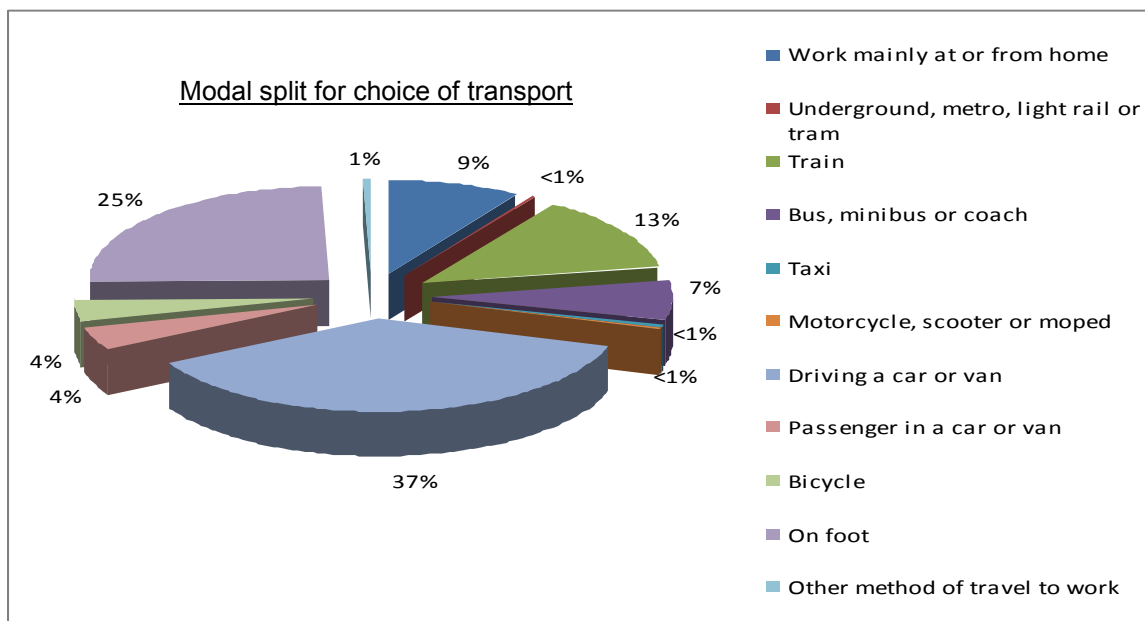


To:	From:	Berechurch	%
Castle		633	14
Shrub End		333	7
Mile End		282	6
Braintree District		228	5
Berechurch		123	3
No fixed workplace		440	9
Other Locations		2305	49
No journey		333	7
Total		4677	100

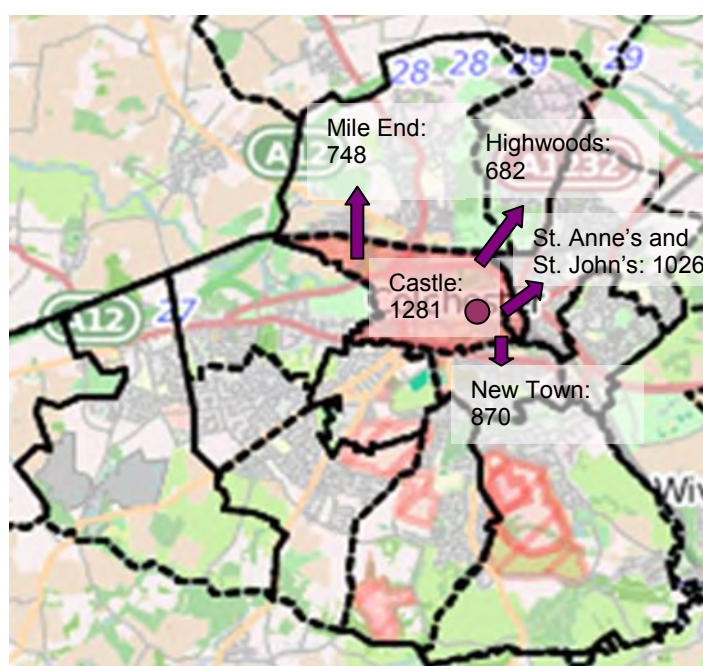


Castle (Town Centre)

Workplace zone 7

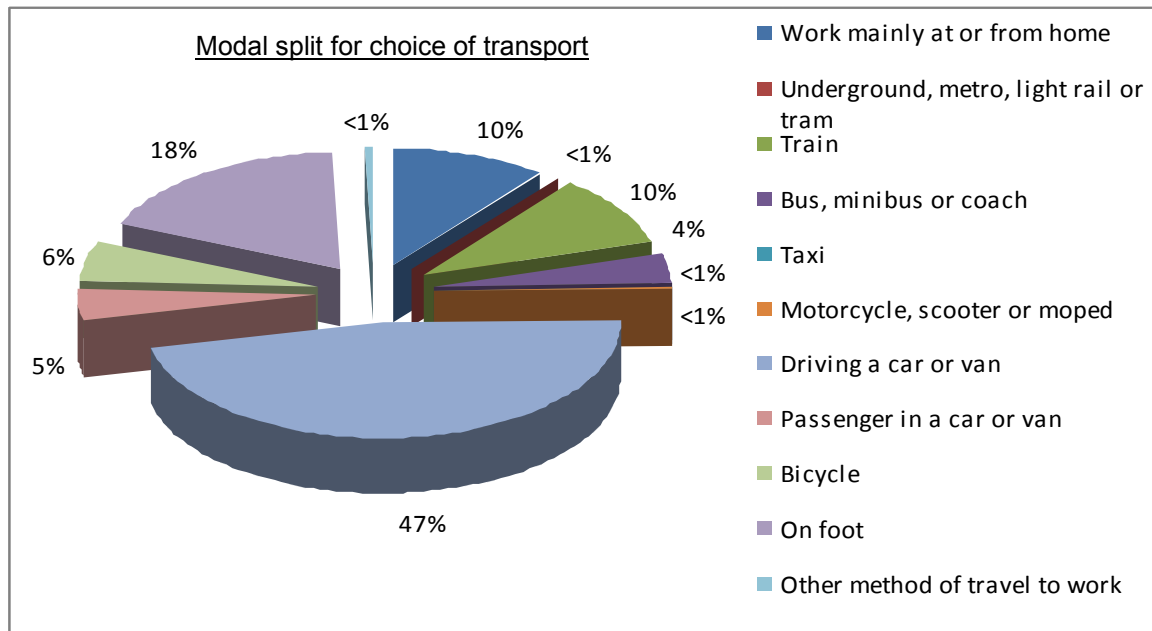


To:	From:	Castle	%
Castle		1281	23
St. Anne's and St. John's		1026	18
New Town		870	16
Mile End		748	13
Highwoods		682	12
No fixed workplace		386	7
Other Locations		91	2
No journey		488	9
Total		5572	100

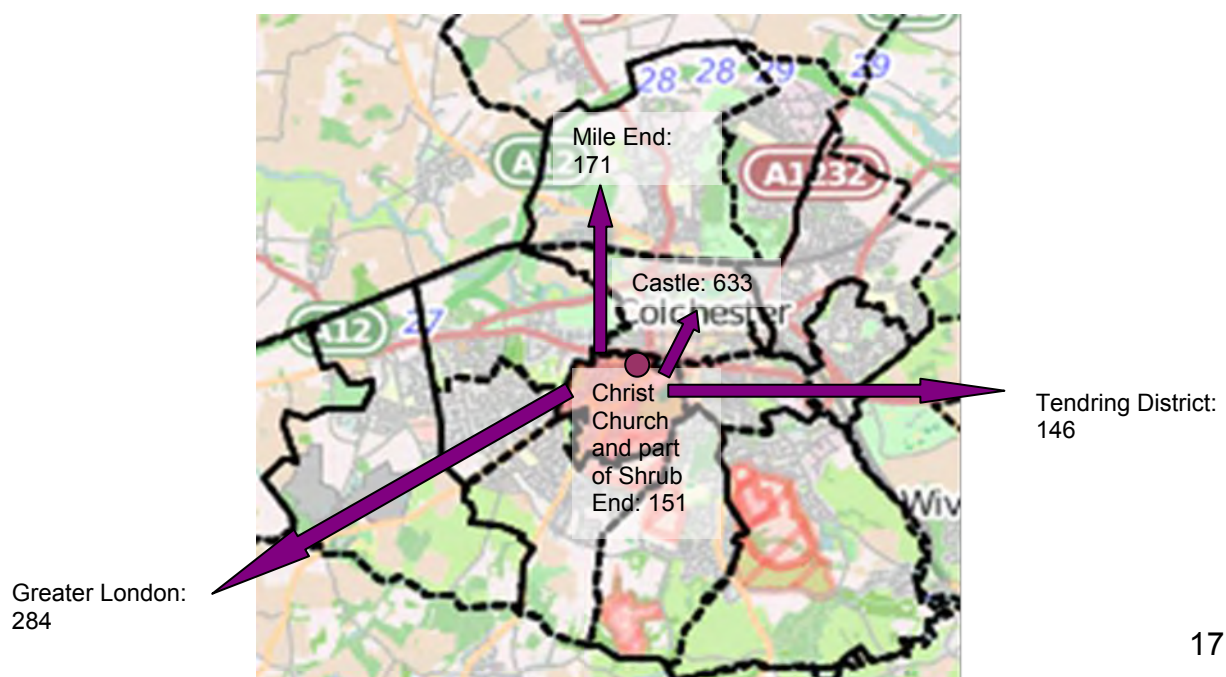


Christ Church and part of Shrub End ward

Workplace zone 13

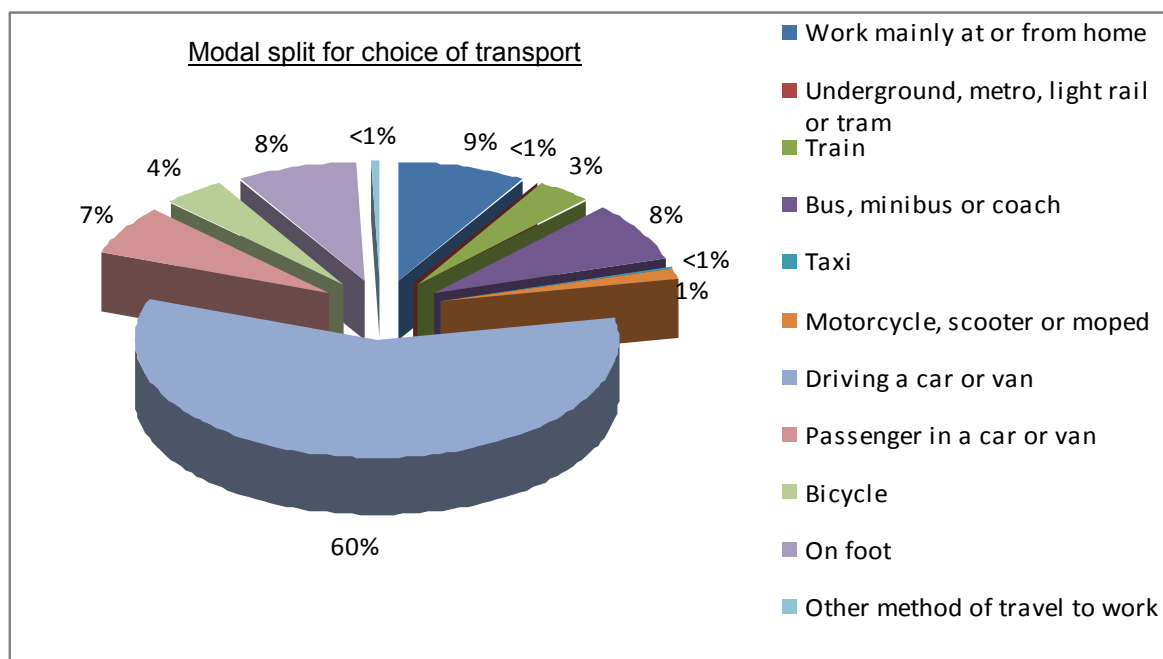


To:	From:	Christ Church and part of Shrub End	%
Castle		627	19
Greater London		284	9
Mile End		171	5
Christ Church and part of Shrub End		151	5
Tendring District		146	4
No fixed workplace		231	7
Other Locations		1355	41
No journey		347	10
Total		3312	100

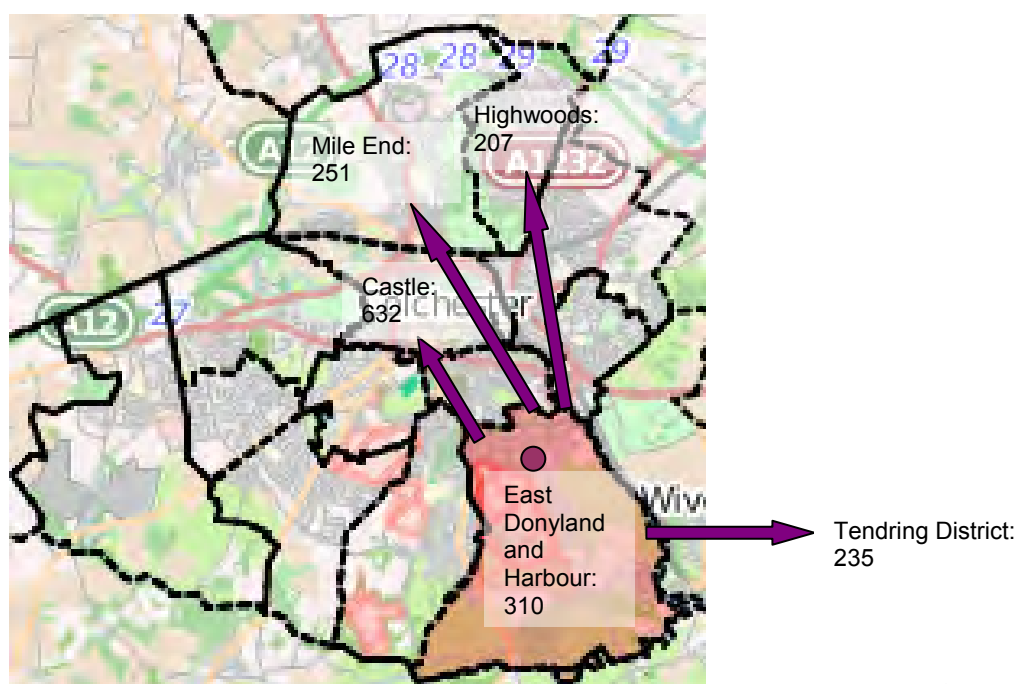


East Donyland and Harbour

Workplace zone 16

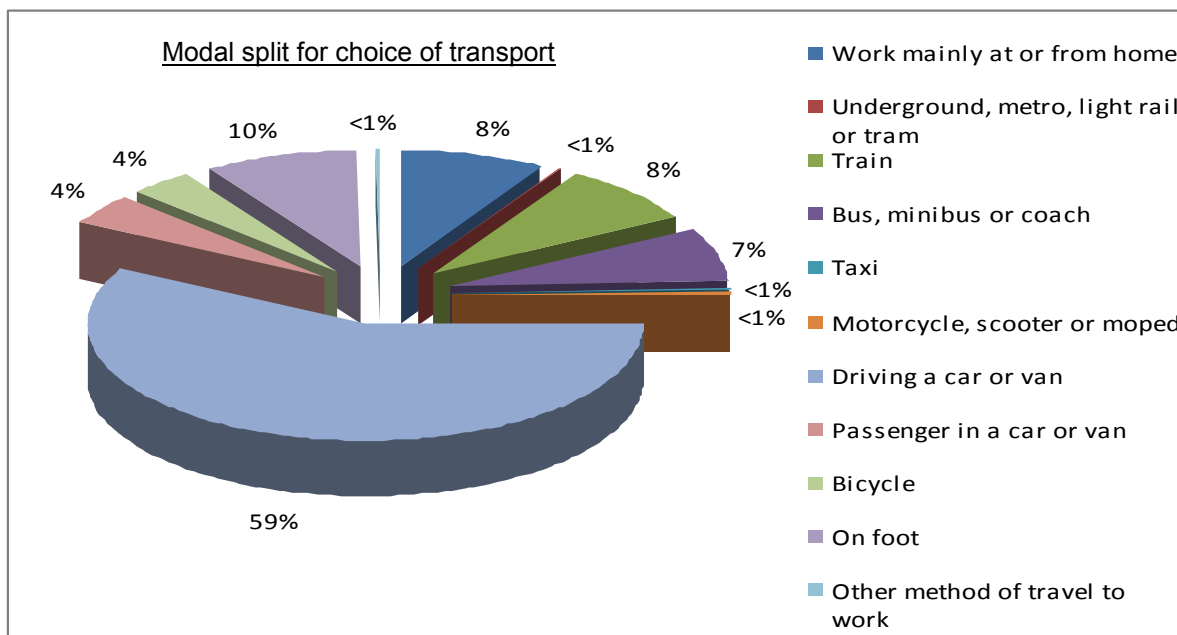


To:	From:	East Donyland and Harbour	%
Castle		632	14
East Donyland and Harbour		310	7
Mile End		251	6
Highwoods		207	5
Tendring District		235	5
No fixed workplace		419	10
Other Locations		1975	45
No journey		374	8
Total		4403	100

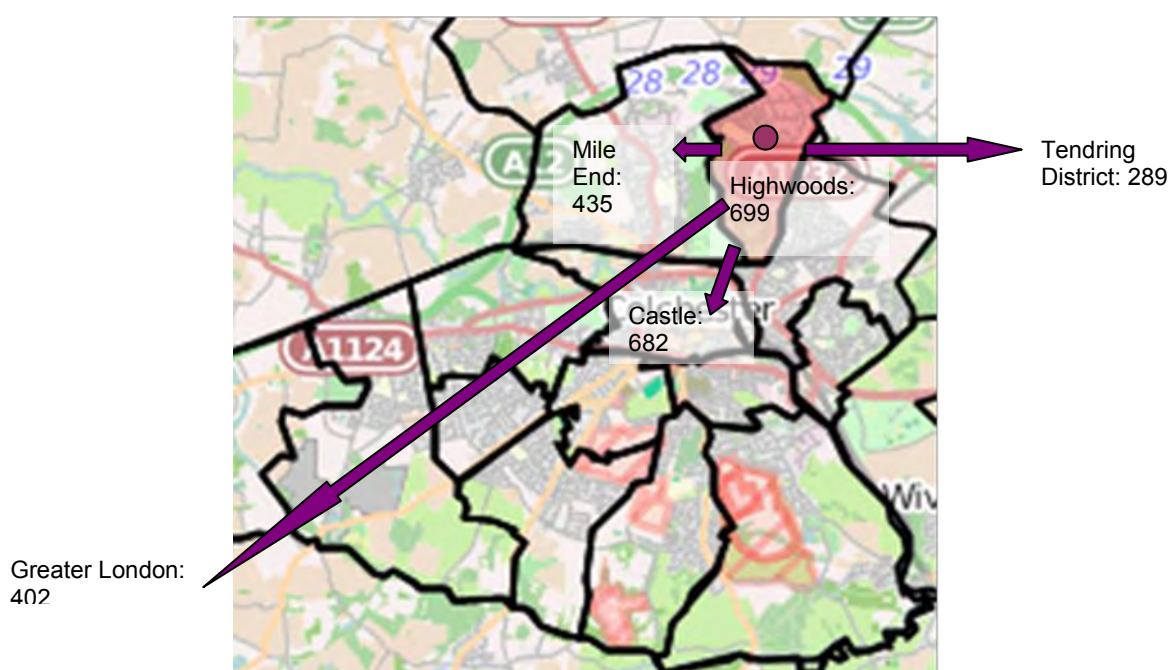


Highwoods

Workplace zone 2

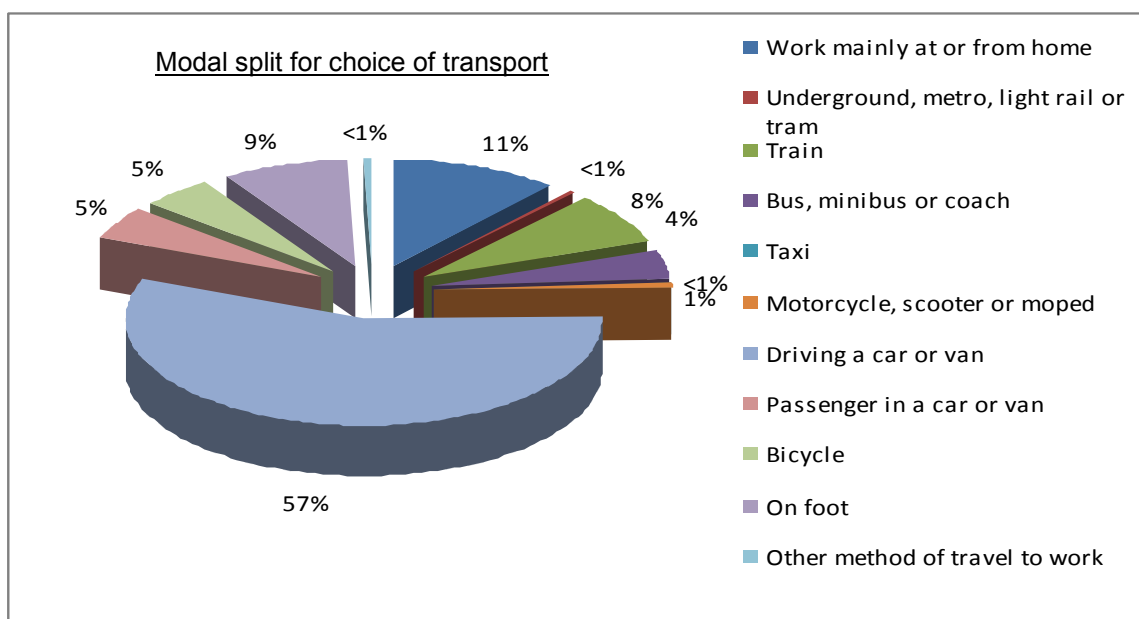


To:	From:	Highwoods	%
Highwoods		699	13
Castle		682	13
Mile End		435	8
Greater London		402	8
Tendring District		289	6
No fixed workplace		378	7
Other Locations		1935	37
No journey		440	8
Total		5260	100

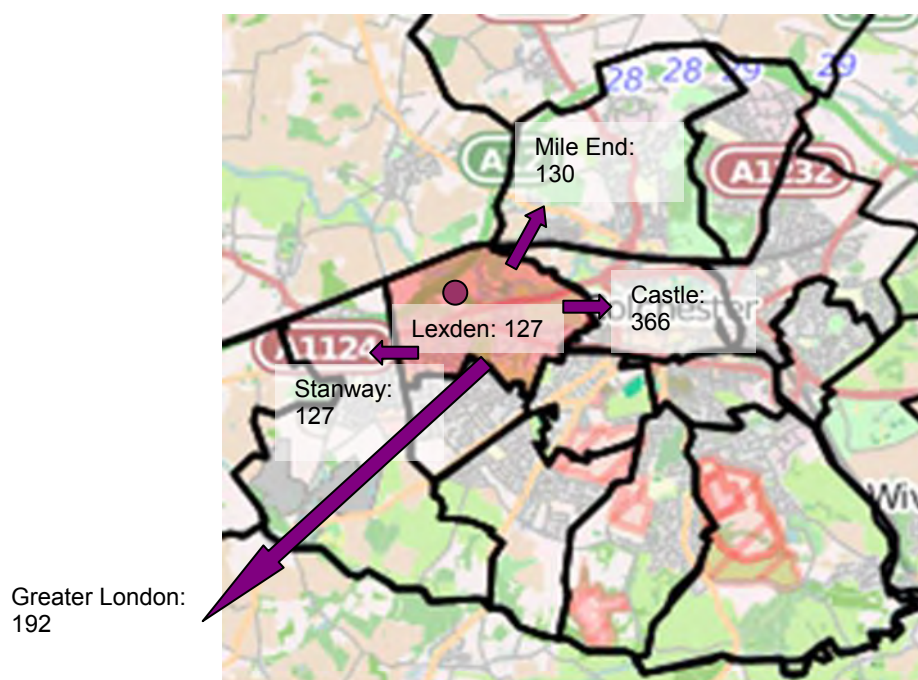


Lexden

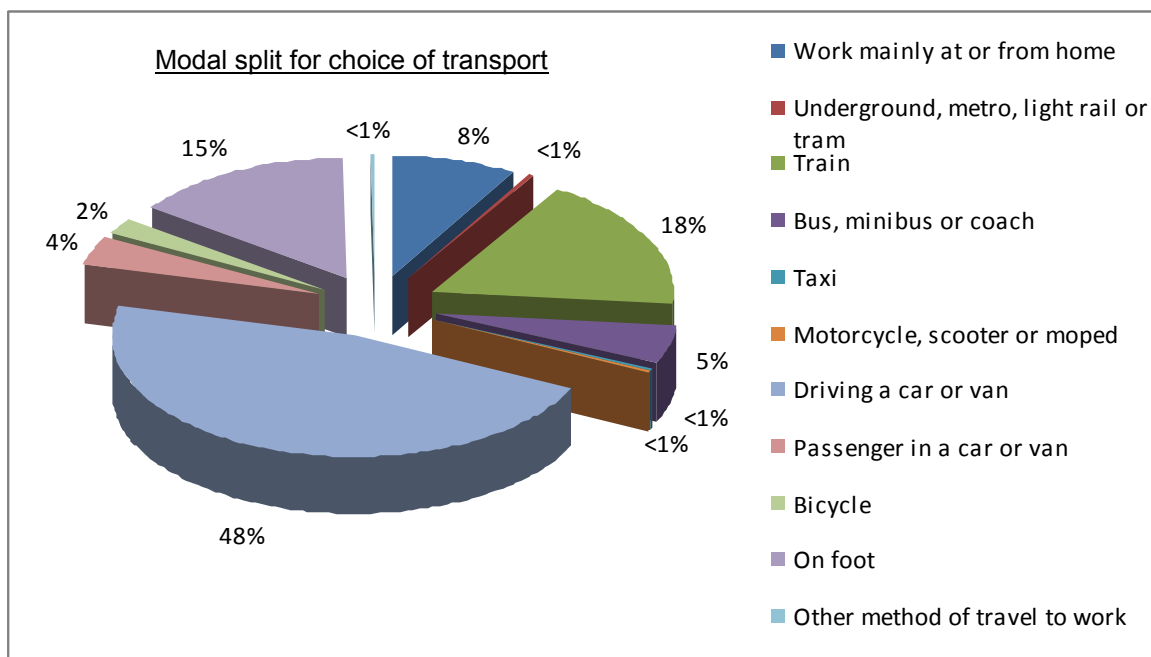
Workplace zone 9



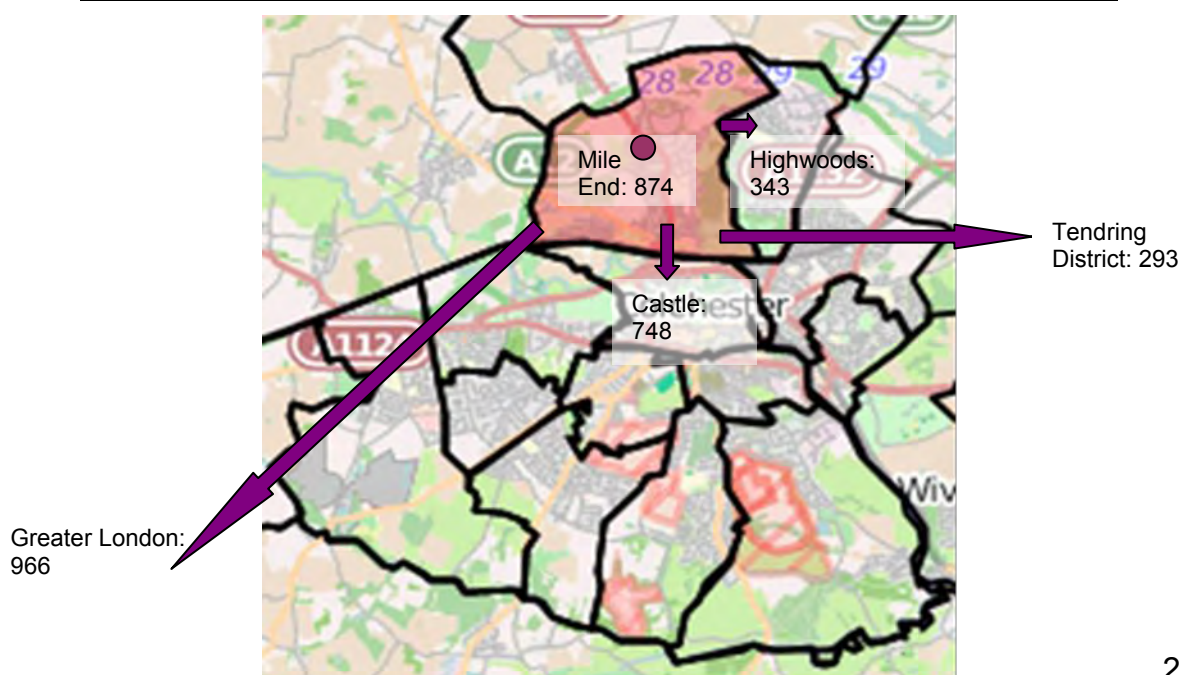
To:	From:	Lexden	%
Castle		366	14
Greater London		192	7
Mile End		130	5
Lexden		127	5
Stanway		127	5
No fixed workplace		209	8
Other Locations		1136	44
No journey		296	12
Total		2574	100



Mile End Workplace zone 4

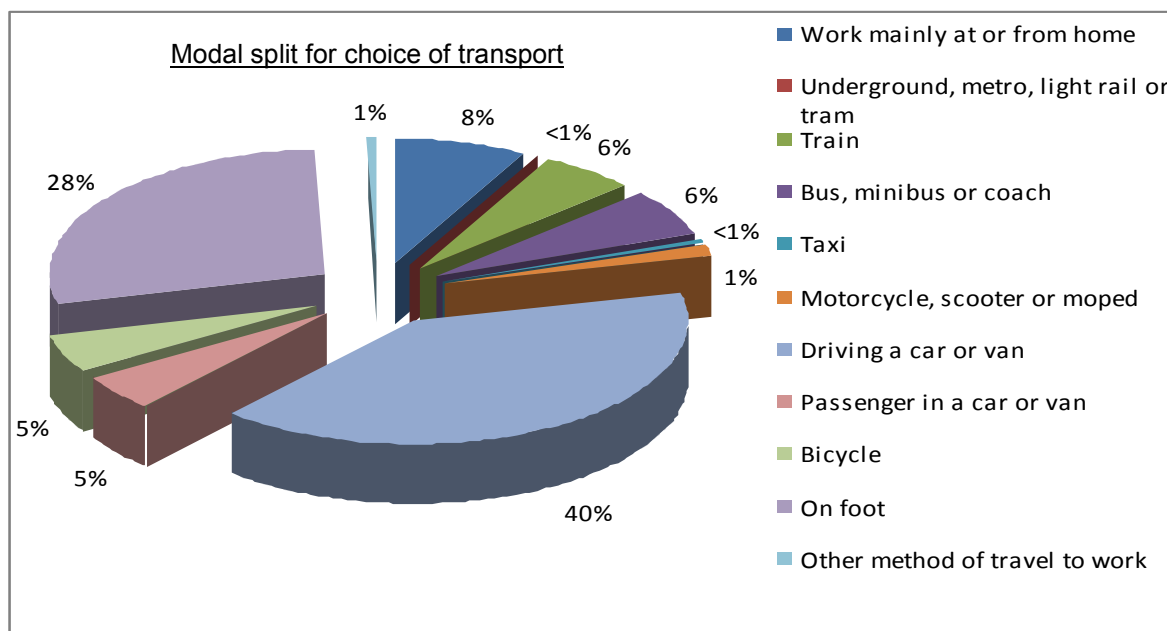


To:	From:	Mile End	%
Greater London		966	16
Mile End		874	15
Castle		748	12
Highwoods		343	6
Tendring District		293	5
No fixed workplace		365	6
Other Locations		1923	32
No journey		496	8
Total		6008	100

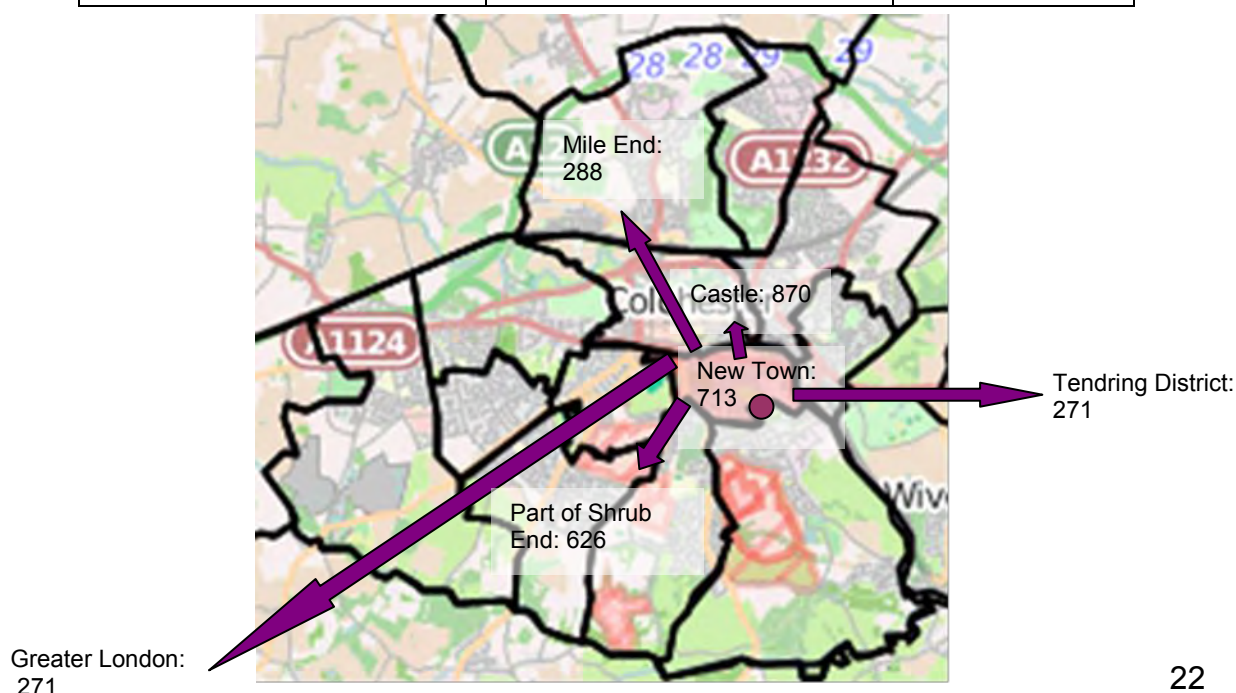


New Town

Workplace zone 11

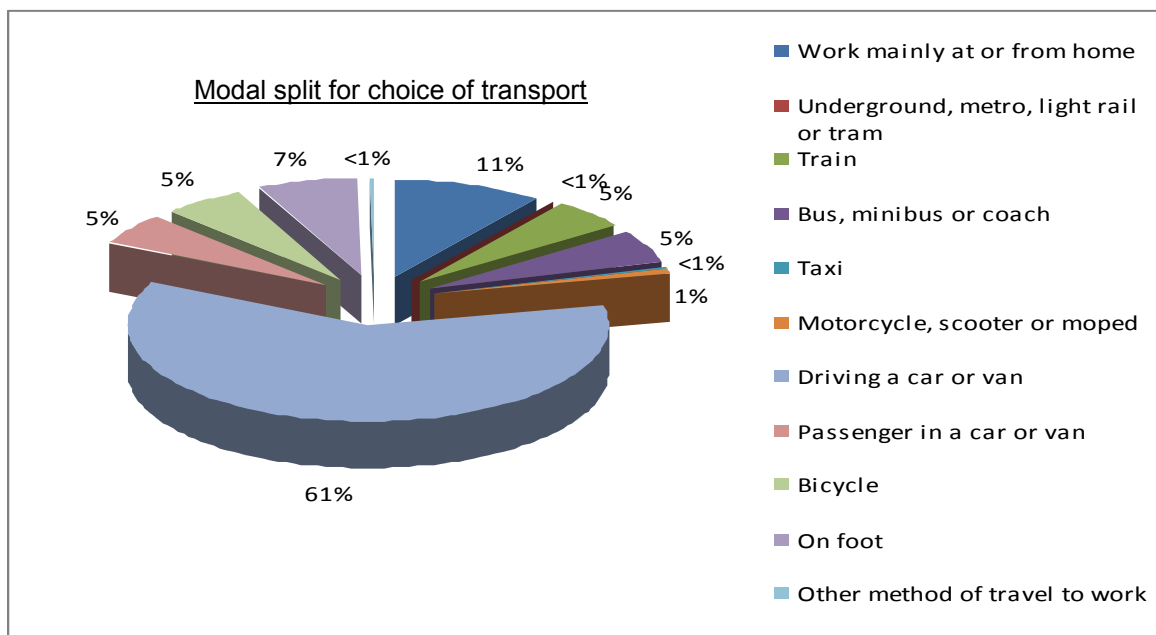


To:	From:	New Town	%
	Castle	870	14
	New Town	713	12
	Part of Shrub End	626	10
	Mile End	288	5
	Greater London	271	4
	Tendring District	271	4
	No fixed workplace	395	6
	Other Locations	2310	37
	No journey	483	8
	Total	6227	100

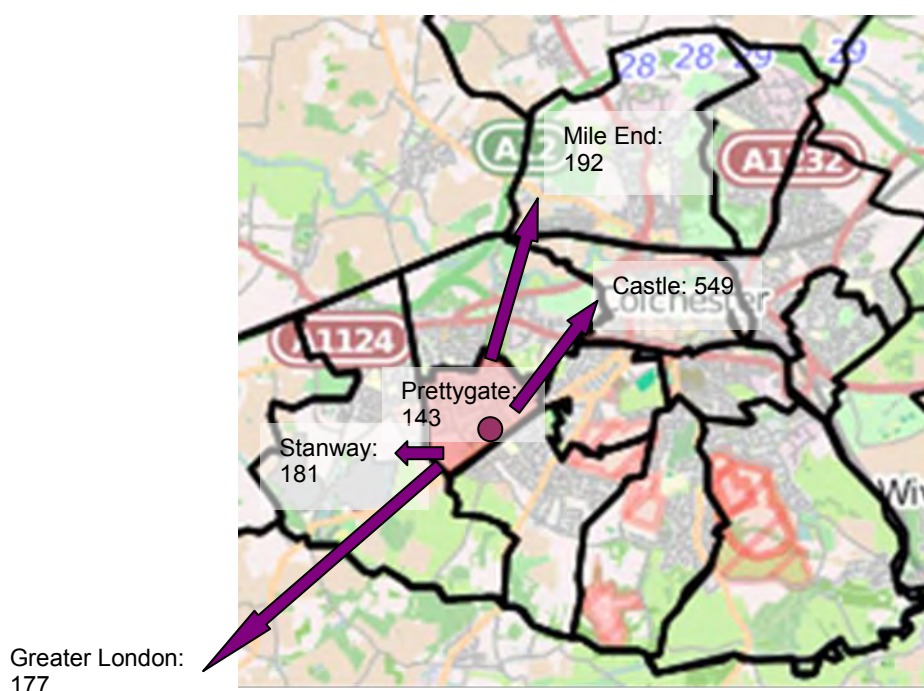


Prettygate

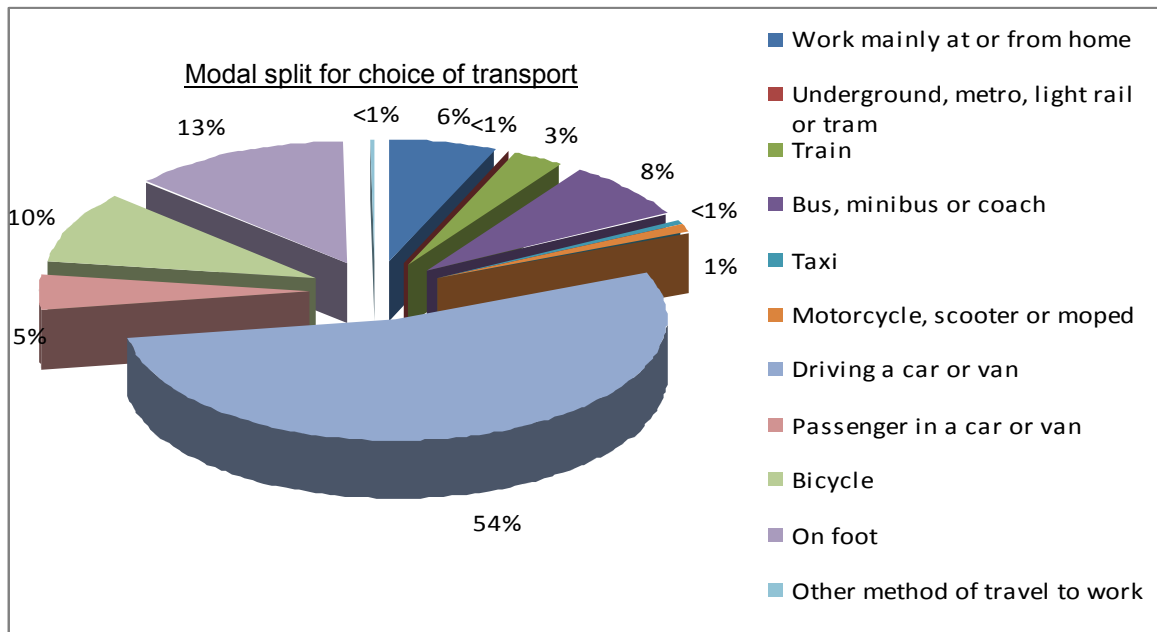
Workplace zone 14



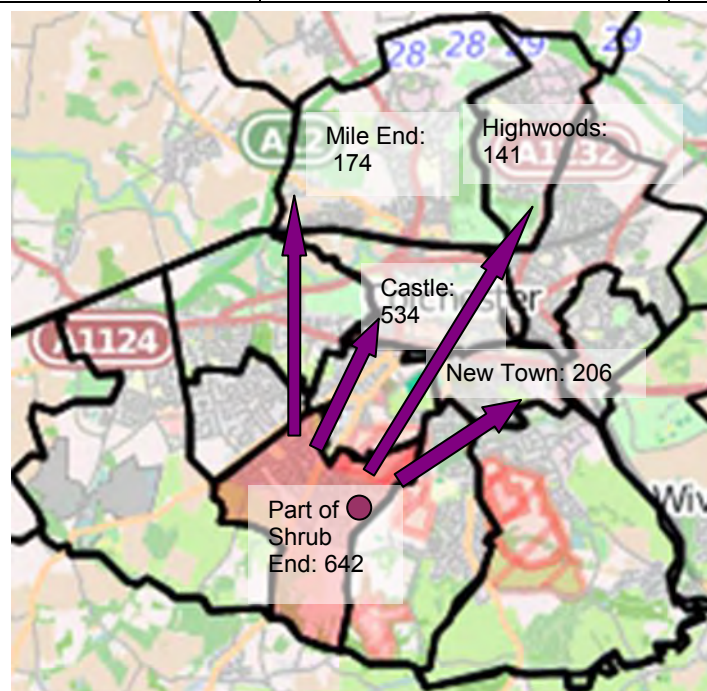
To:	From:	Prettygate	%
Castle		549	16
Mile End		192	6
Stanway		181	5
Greater London		177	5
Prettygate		143	4
No fixed workplace		268	8
Other Locations		1607	46
No journey		344	10
Total		3461	100



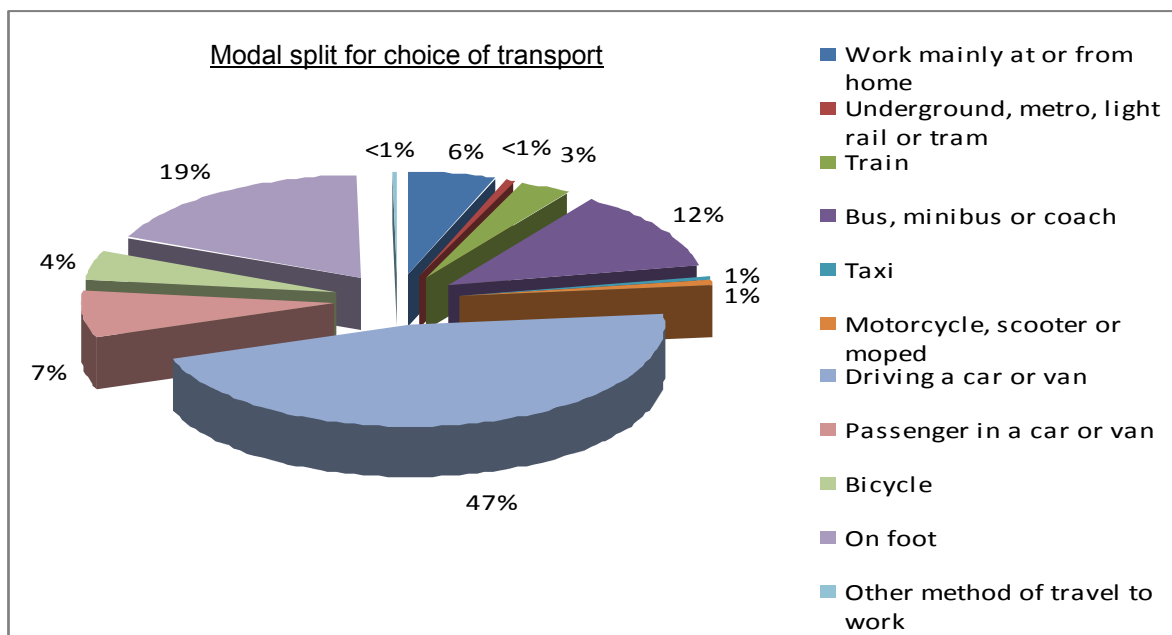
Part of Shrub End ward Workplace zone 15



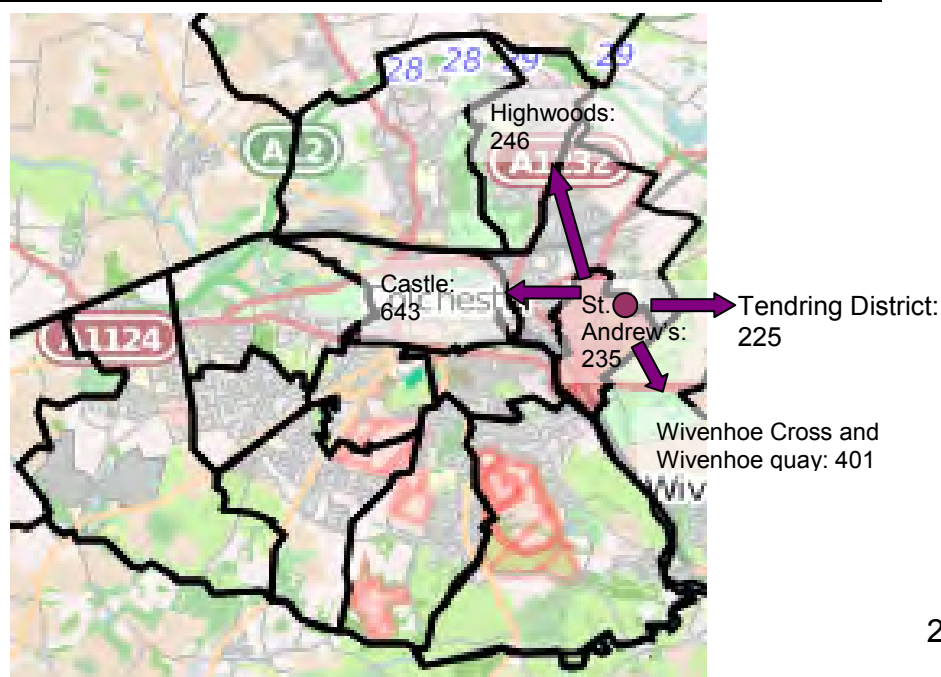
To:	From:	Part of Shrub End	%
Part of Shrub End		642	16
Castle		534	13
Newtown		206	5
Mile End		174	5
Highwoods		141	4
No fixed workplace		329	8
Other Locations		1717	43
No journey		251	6
Total		3994	100



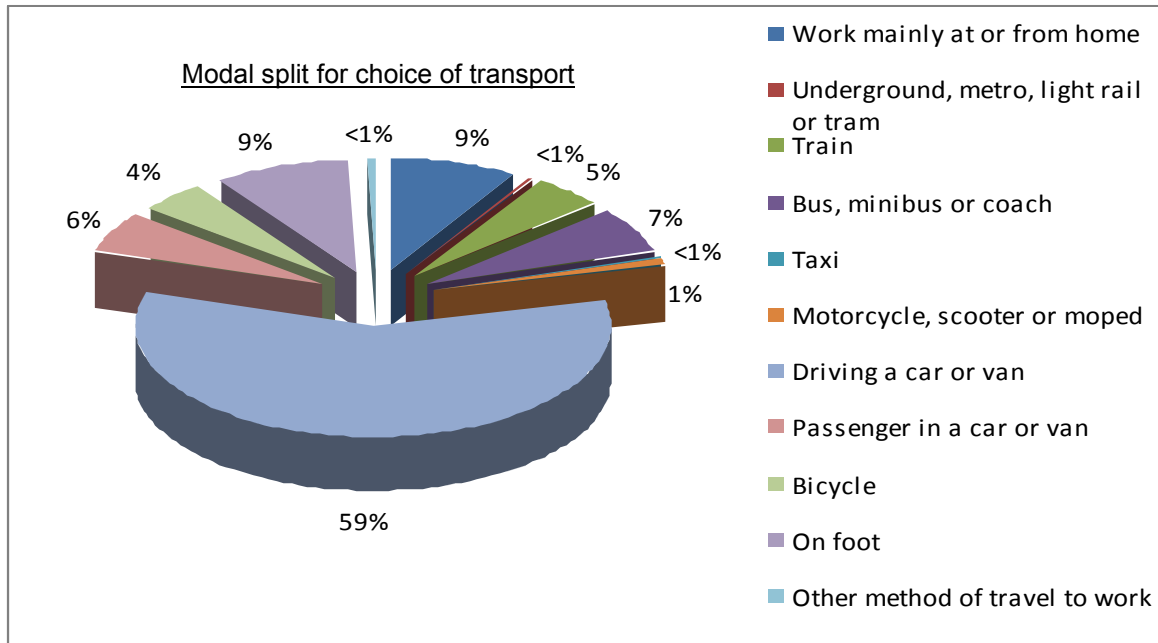
St. Andrew's Workplace zone 8



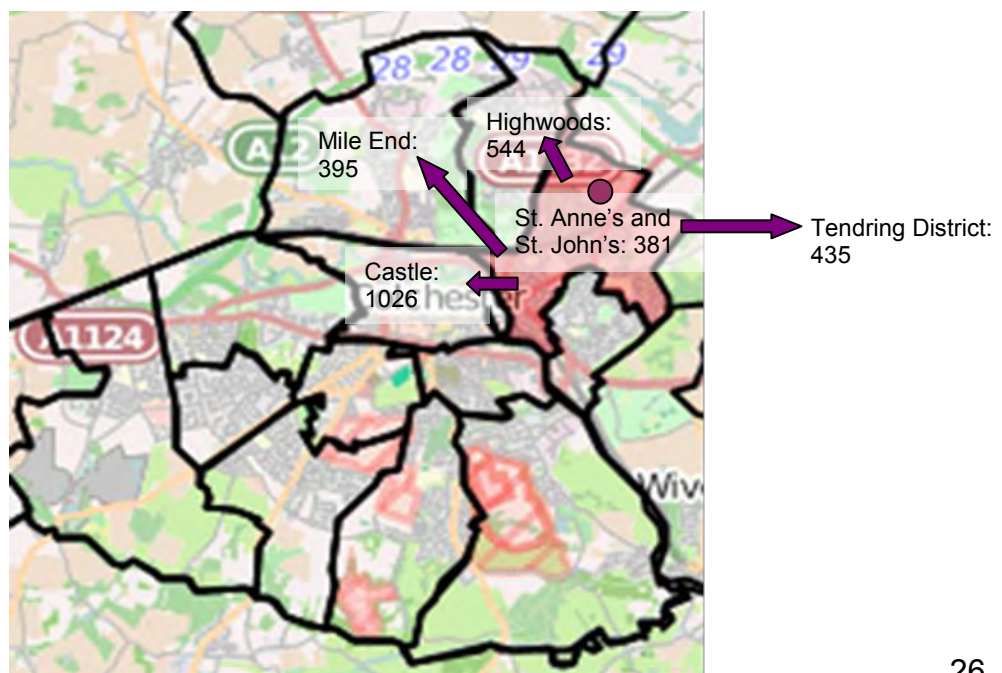
To:	From:	St. Andrew's	%
Castle		643	16
Wivenhoe area		401	10
Highwoods		246	6
St. Andrew's		235	6
Tending District		225	5
No fixed workplace		370	9
Other Locations		1746	42
No journey		232	6
Total		4098	100



St. Anne's and St. John's Workplace zone 22

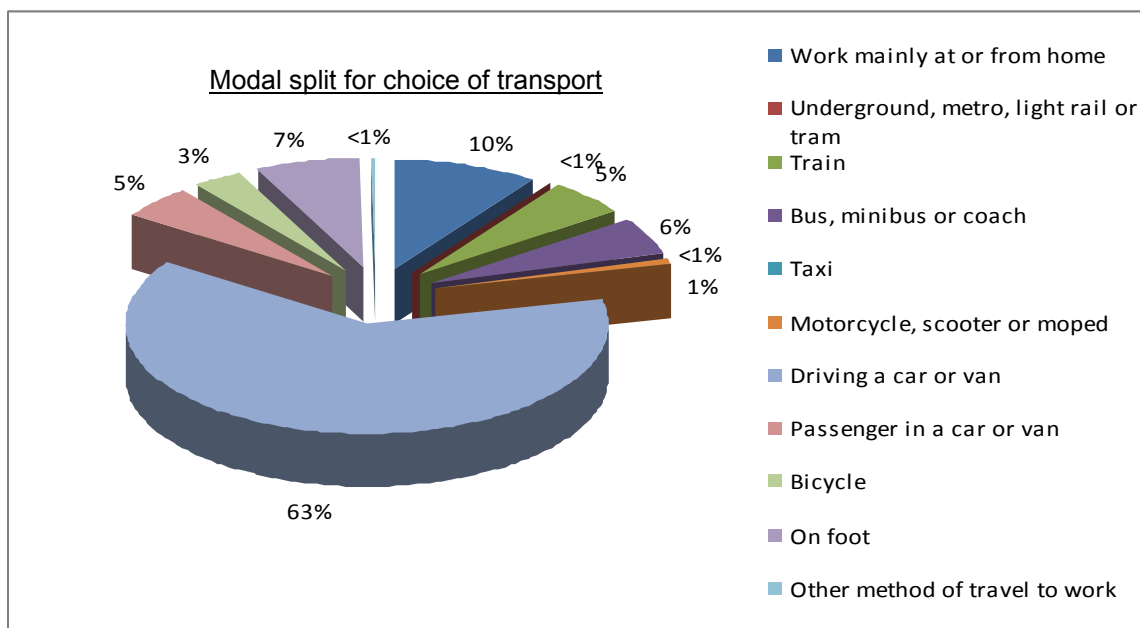


To:	From:	St. Anne's and St. John's	%
Castle		1026	15
Highwoods		544	8
Tendring District		435	6
Mile End		395	6
St. Anne's and St. John's		381	6
No fixed workplace		583	9
Other Locations		2722	41
No journey		576	9
Total		6662	100

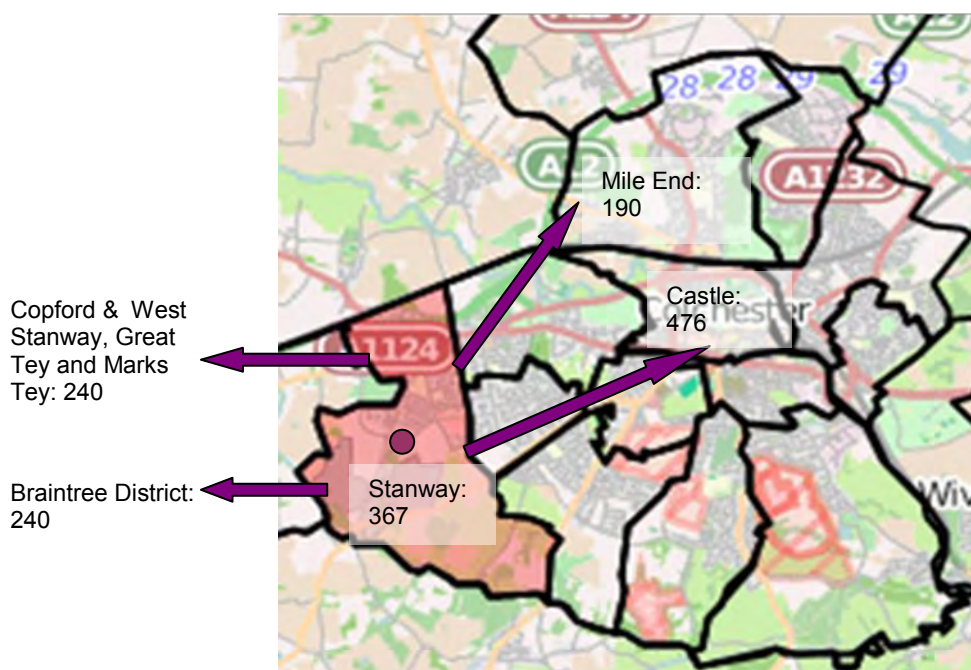


Stanway

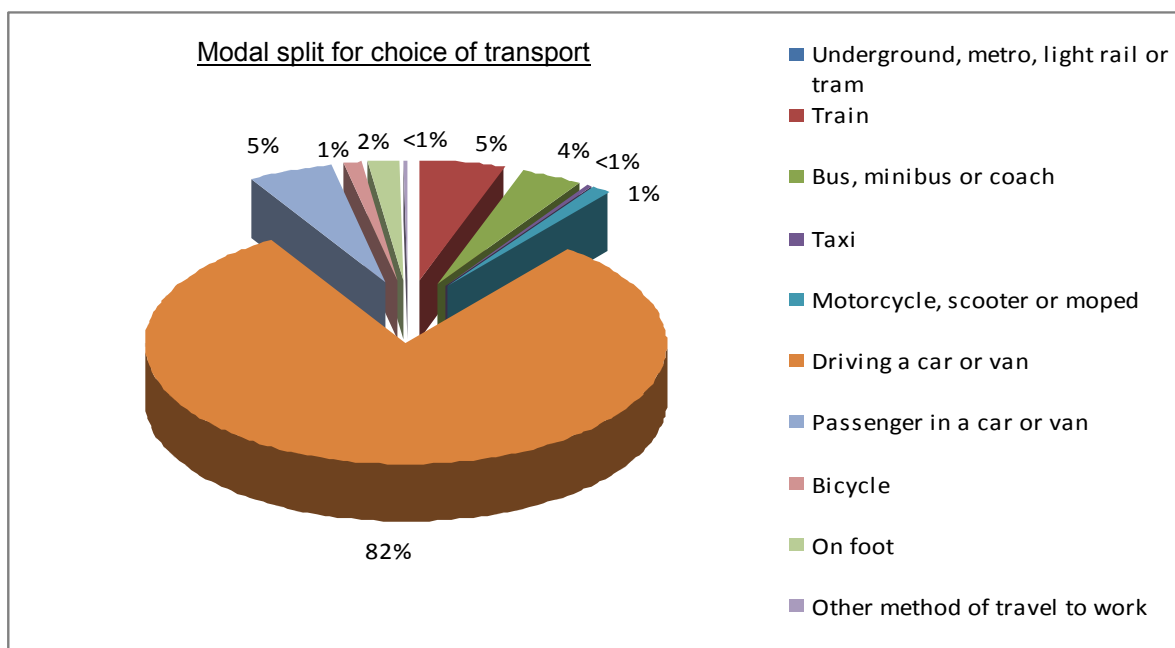
Workplace zone 12



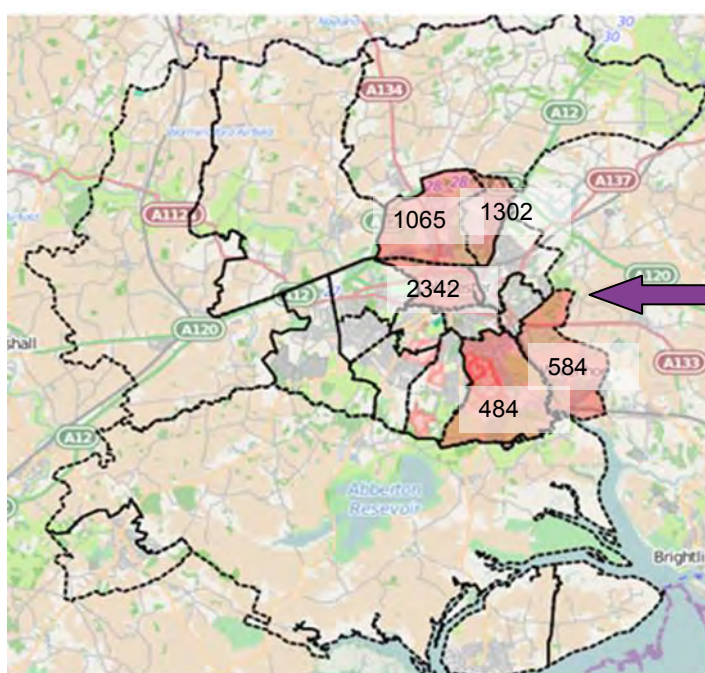
To:	From:	Stanway	%
	Castle	476	11
	Stanway	367	9
	Copford & West Stanway, Great Tey and Marks Tey	240	6
	Braintree District	240	6
	Greater London	237	6
	Mile End	190	4
	No fixed workplace	358	8
	Other Locations	1684	40
	No journey	407	10
	Total	4199	100



Journeys into Colchester from Tendring



To:	From:	Tendring	%
Castle		2342	27
Highwoods		1302	15
Mile End		1065	12
Wivenhoe Cross & Wivenhoe Quay		584	7
East Donyland and Harbour		484	5
Other Locations		2960	34
Total journeys		8737	100



**Tendring District:
8,737**

5 October 2015

Report of	Head of Commercial Services	Author	Jess Tipper 01206 508920
Title	Colchester's Archaeology and Development Strategy		
Wards affected	All		

The Local Plan Committee is asked to adopt Colchester's Archaeology and Development Strategy to update the existing guidance

1. Decision(s) Required

- 1.1 To adopt technical planning guidance governing Archaeology and the Historic Environment in the form of *Colchester's Archaeology and Development Strategy*. This will supersede the existing guidance adopted in 2014.

2. Reasons for Decision

- 2.1 The appropriate assessment of the historic environment resource is a key part of the planning process and this guidance will ensure Members and customers are up to date with national policy and how it is interpreted at the local level in Colchester.
- 2.2 The Technical Guidance will ensure that applicants and developers have access to a clear and informative source of guidance as to what the Council requires in the assessment, investigation and conservation of the historic environment and archaeological remains.
- 2.3 The Technical Guidance is consistent with technical advice produced by local authorities across the country. The Guidance will ensure that the Council's approach towards the historic environment is consistent with the approach of other local authorities. This guidance will enable customers to self-serve and will help promote modal shift and the efficient use of resources.

3. Alternative Options

- 3.1 The Committee could decide not to adopt the Technical Guidance. Such a decision would result in applicants and developers not having clear guidance. This may have the effect of causing delays and inefficiency in the planning process.

4. Supporting Information

- 4.1 The National Planning Policy Framework (NPPF) came into effect on 27th March 2012 and is a material consideration in planning decisions. It sets out the Government's planning policies on the conservation of the historic environment. In terms of the historic environment, the NPPF replaced *Planning Policy Statement 5: Planning for the Historic Environment* (March 2010).

- 4.2 Section 12 of the NPPF relates to the conservation and enhancement of the historic environment. The Framework confirms that heritage assets (including their setting) should be conserved in a manner proportionate to their significance.
- 4.3 The Technical Guidance will reinforce the Council's relevant local plan policies. The [Current Local Plan 2001-2021](#) sets out the strategic policies to deliver conservation and enjoyment of the historic environment.

The Core Strategy Policy ENV1 (Environment) confirms the Council will protect, conserve or enhance the interests of historic assets.

Development Plan Policy DP14 relates specifically to heritage assets in the planning process at a local strategic level. The Local Plan takes into account:

- The desirability of putting heritage assets to viable use, sustaining and enhancing their significance;
- The contribution that the historic environment makes to wider sustainability aims;
- The desirability of new development to contribute to local character;
- The opportunities to draw on the contribution that the historic environment makes on the character of place.

Development Plan Policies DP1, DP5, DP6, DP9, DP13, DP21, DP 22 and DP23 are also relevant to the historic environment, heritage assets and sustainable development.

5. Proposals

- 5.1 It is proposed that the Technical Guidance is adopted as a material planning consideration which will guide applicants and developers through the planning process to ensure that they meet the requirements of the Council in the assessment, investigation and conservation of archaeological remains in a manner which is both compliant with national planning policy and the Council's relevant local plan policies. It will also ensure consistency with the approach of other Essex Councils.
- 5.2 The document summarises national and local policy relevant to archaeology and provides links to relevant information. It then goes on to explain how archaeological issues will be dealt with in the determination of planning applications, covering such issues as;
- how archaeological potential is identified;
 - the need for a heritage statement where an application has the potential to impact on a heritage asset;
 - requirements for archaeological evaluation (ie geophysical survey, topographic survey, fieldwalking and metal-detecting survey, palaeoenvironmental assessment and trial-trenching);
 - archaeological mitigation
 - building recording;
 - countryside and hedgerow advice;
 - guidance on places of worship;
 - provision for public benefit to publicise new finds
 - procedures for curation of archives;

6. Strategic Plan References

- 6.1 The Strategic Plan Action Plan includes a commitment to make Colchester a vibrant, prosperous, thriving and welcoming place. Under the 'Vibrant' heading the plan states

we will “Make more of Colchester's great heritage and culture so that people can enjoy them and draw inspiration for their creative talents”.

- 6.2 The adoption of this Technical Guidance will help the Council achieve these objectives through promoting the heritage resource and making the efficient use of land in the Borough.

7. Consultation

- 7.1 There is no requirement to consult on the adoption of this Technical Guidance.

8.0 Publicity Considerations

- 8.1 It is considered unlikely that the adoption of the Technical Guidance will attract publicity.

9. Financial Implications

- 9.1 There are no identified financial implications to the Council in adopting this Technical Guidance.

10. Equality, Diversity and Human Rights implications

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

11. Community Safety Implications

- 11.1 None.

12. Health and Safety Implications

- 12.1 None

13. Risk Management Implications

- 13.1 Ensuring members are fully briefed on planning decisions and relevant policies in the Local Plan that will help reduce the risk of inappropriate development being permitted.

14. Disclaimer

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

Appendices

Appendix A – *Colchester's Archaeology and Development Strategy*.

Colchester's Archaeology and Development Strategy

Colchester Local Development Framework Supplementary Planning Document Adopted 2015

Introduction

Colchester is one England's major historic centres with a rich archaeological and historical heritage that shapes the character of the modern town and its hinterland. Colchester's Heritage is a source of pride and community identity to residents, making the area an attractive place in which to live, work and visit.

Heritage is recognised as a key priority in [Colchester Borough's Strategic Plan 2015-2018](#). Through its strategic aims, the Council is committed to conserving and enhancing its heritage assets, to promote interest in, and enjoyment of, Colchester Borough's history and to improve the quality of life for people who live, work in and who visit the area.

Colchester's Heritage Strategy defines the following themes:

- Promote best practice in terms of conservation and stewardship of Colchester's heritage assets, supported by key stakeholders and national and local government policy and guidance.
- Promote positive initiatives that secure the conservation, beneficial management and enhancement of Colchester's heritage assets and maximise the contribution of heritage to sustainable development.
- Promote high quality design in new development that respects and enhances heritage assets, local distinctiveness and the character of Colchester Borough's townscape and rural landscape.
- Promote Colchester Borough's rich heritage at local, regional and international levels, showing the Borough as a good place to visit, live, work and invest in.
- Identify opportunities to support the Council's ambitious regeneration agenda through positive intervention initiatives within the historic environment.
- Identify opportunities presented by new development to promote greater understanding about local heritage within local communities.
- Identify opportunities for residents and visitors to participate in heritage initiatives, maximising its contribution to health, wellbeing and learning.
- Identify opportunities to display new heritage discoveries in a range of appropriate community settings.
- Maintain, enhance and promote the Historic Environment Record, which is a key resource and the evidence base for all heritage assets, for the whole Borough.

- Promote the long-term curation of important archaeological archives and collections and make them available for display and study.
- Promote an integrated approach between different services, organisations, and sectors, to increase the impact and audience of Colchester's heritage assets.

This Archaeology and Development Strategy develops the key themes defined in the Heritage Strategy relating to development in Colchester Borough. It outlines the approach Colchester Borough Council will take in determining planning applications that affect its archaeological heritage and the historic environment, supported by national and local government planning policy. It is a robust strategy for managing and celebrating the remains of its historic past for the benefit of today's community and for future generations.

Decisions relating to new development will be carefully assessed to ensure that Colchester's archaeological remains are conserved and enhanced, and also to ensure that they are not a barrier to sustainable development. The historic environment can accommodate a variety of economic uses, facilitate growth and employment, as well as making Colchester a more attractive place to live, work and visit.

Status of this document

The archaeological implications of development proposals in Colchester are assessed in accordance with the [National Planning Policy Framework](#) and Policy DP14 of the [Current Local Plan 2001-2021](#). This document supplements and adds an additional level of detail to this planning policy. It is an important material consideration for Development Management when assessing development proposals or applications within Colchester Borough.

This document will assist also developers, property owners, their agents and advisors by setting out and explaining the procedures with the Borough Council expects to be followed:

- It gives guidance to applicants on the likely archaeological works that will be expected.
- It promotes the historic environment as a positive contributor to economic development in the Borough.
- It promotes interest in, and enjoyment of, Colchester Borough's rich archaeological heritage, to improve the quality of life for people who live, work in and who visit the area.

Colchester's Historic Environment: the Evidence Base

The historic environment is a major component of the fabric of the town and also of rural settlement in the Borough, closely related to the natural environment and in particular to the pattern of river valleys - Rivers Stour and Colne, and their tributaries, which bisect the Borough (north-) west to (south-) east. In general, river valleys are topographically favourable for early occupation of all periods and, consequently, these have been densely settled from the Neolithic onwards.

Town

Colchester has an unusually rich and varied historic environment that has determined the shape and form of the modern town centre. During the Late Iron Age and Roman periods, in particular, Colchester was one of the major settlements in southern England. It re-emerged as one of the major regional towns in the medieval and post-medieval periods with the growth of the cloth industry. Colchester's position in the region was consolidated with the growth of the engineering industry and with the establishment of the garrison.

The late Iron Age territorial settlement of Camulodunum, and the later Roman (and medieval) walled town, was located in a classic location for early occupation, delimited by the River Colne to the north and by the Roman River to the south, and enclosed by an extensive earthwork system to the west. It was close to the North Sea, facilitating international communication, trade and exchange as well as benefiting from the resources of a valley location (fertile soils and marine resources).

The extent and visibility of late prehistoric and Roman remains in and around the town, in particular, stands Colchester apart in the region. Some heritage assets, however, are less tangible than others. While it is easy to be drawn to the standing monuments, less visible, though equally important, are the largely buried archaeological remains.

Within Colchester's historic town centre, there are deep and often well-preserved stratified archaeological deposits, spanning 2000 years. These survive below buildings as well as in open areas within the walled town. Such archaeological deposits are exceptionally rare.

Borough

Colchester is one of the most studied towns in the country. Many archaeological investigations have been undertaken in Colchester since the mid 19th century and the town has been the subject of antiquarian interest since, at least, the late 16th century. Across the Borough as a whole, however, only limited archaeological investigations have taken place and consequently less is known about the archaeological resource. This is primarily because the majority of new development has taken place in and around the modern town. In addition, intensive agricultural regimes since the medieval period, if not earlier, have levelled most archaeological remains and there are few well-preserved and visible archaeological remains outside of the town.

Intensive archaeological investigation has been undertaken in several locations outside of the town in advance of aggregate extraction, to the north and west of Colchester. Large-scale archaeological investigations have taken place over a period of years at Birch Pit, Stanway Pit and Abbotstone Field, to the south-west of the town, in advance of sand and gravel extraction.

Investigations at Birch Pit have defined the remains of an extensive Roman (and possibly earlier) enclosed landscape, with settlement, trackways and enclosed fields. At Stanway, excavations have defined a group of high status Iron Age burials in enclosures amongst other discoveries. Abbotstone Field, to the west of Stanway pit, revealed a Late Iron Age and Roman enclosed farmstead and Medieval field system.

It can be anticipated that a similar density of archaeological remains will be encountered elsewhere in the Borough, particularly within valley locations.

Over the last 15 years, the redevelopment of Colchester Garrison has afforded the archaeological investigation of a large area to the south, and within the immediate hinterland, of the Roman and Medieval walled town. The investigations show a system of ditched droveways and enclosures, and a scatter of small farmsteads which originated in the Late Iron Age and survived throughout the Roman period. Excavations on the site of the Garrison also led to the discovery of the Roman Circus, as well as hundreds of Roman burials.

Although the rest of the Borough has not been the subject of any intensive or systematic archaeological investigation, there are still many recorded archaeological sites, find spots and artefact scatters within the Borough from all periods of history. These indicate there is a rich archaeological resource across the Borough. The 'traditional' agriculture landscape of fields and farms emerged from the late Bronze Age (c.1000 – 700 BC) onwards. Although the origins of the existing field boundaries are unknown some could have medieval or earlier origins.

Designated Heritage Assets

Designated heritage assets are nationally important sites which enjoy statutory protection. Colchester Borough contains over 1,700 Designated Heritage Assets. They comprise of listed buildings, scheduled monuments, registered parks and gardens, battlefields and protected wreck sites. Historic England administers the national designation regimes and maintains the list of designated heritage assets, the [National Heritage List for England](#) (NHLE). The extent and area of the designated heritage assets in Colchester can be found on the [Colchester's Interactive Map](#) page.

Designated heritage assets are protected under a number of Acts of Parliament, principally the [Ancient Monuments and Archaeological Areas Act 1979](#) for Scheduled Monuments and the [Planning Act \(Listed Buildings and Conservation Areas\) 1990](#) for Listed Buildings.

Scheduled Monuments

There are 45 Scheduled Monuments within the Borough, of which 20 are located in Colchester town. They include Gosbecks Archaeological Park, the Roman Circus, the Town Walls and the remains of St John's Abbey and St. Botolph's Priory. In terms of the walled town (48 ha. in area), nearly 20% of the area (8.65 ha.) is Scheduled.

All works to a Scheduled Monument require Scheduled Monument Consent, administered by [Historic England](#) on behalf of the Secretary of State – a procedure that is entirely separate from the planning process. Unauthorised work to a Scheduled Monument is a criminal offence under the 1979 Act. Alterations to the visual character of a monument are also a material consideration in the planning process.

There are also a small number of non-designated heritage assets within the Borough that are considered to be of schedulable quality. The reason some nationally important monuments are not scheduled is set out in the document [Scheduled](#)

[Monuments](#), published by the Department for Culture, Media and Sport. Where they are shown to survive, the deep stratified archaeological deposits preserved within the entire area of the walled town are considered to be of equivalent significance to scheduled monuments and they will be considered subject to the policies for designated heritage assets (in accordance with the NPPF paragraph 139).

Listed Buildings

There are over 1,500 listed buildings in Colchester Borough, over 400 are located within the town alone and of these 41 are at the highest listing as Grade I. This includes the Castle Keep and St John's Abbey Gatehouse in Colchester. Although most structures on the List are buildings, other structures such as bridges, monuments, sculptures and war memorials are also listed. Some designated heritage assets are both scheduled and listed.

Applications for Listed Building consent are administered by Colchester Borough Council, although applications for works to Grade I and II* buildings are automatically referred to Historic England.

Heritage Management Plans

There are conservation management plans for some of the designated heritage assets owned and/or managed by the Borough Council. A conservation management plan sets out the significance of a heritage asset, and how that significance will be retained in any future use, management, alteration or repair.

Conservation Areas

There are 23 [Conservation Areas in Colchester Borough](#), generally the centres of historic towns and villages, designated for their special architectural and historic interest; a list of conservation areas is available from the Council. Conservation areas are designated because of their special architectural or historic interest. The character or appearance of a conservation area is recognised as being worthy of preservation or enhancement. New developments within a conservation area are subject to special planning requirements that ensure the special qualities of that area are preserved.

Conservation area appraisals are used to help the Council develop management plans and appropriate policies for the Local Plan.

The enhancement of historic buildings is usually linked to improvements in physical environments in historic town and village centres. In turn such improvements can help to enhance business confidence in an area, attract inward investment and stimulate further economic growth. Development of the historic environment can, therefore, be a positive catalyst to growth.

Essex County Council maintains a [Local Heritage at Risk Register](#) for the County.

The National Planning Framework

The Historic Environment is a finite and non-renewable resource. Heritage assets are fragile and can be irreparably damaged by inappropriate works.

Careful management is required to ensure that the historic environment is considered in accordance with the principles of sustainable development that are set out in the [National Planning Policy Framework](#) (NPPF).

Policies concerning the historic environment are outlined in Section 12 of the NPPF. The NPPF states, '*Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance*'.

The NPPF outlines the importance of good design in development proposals (Section 7). Paragraph 58 of the NPPF states:

'Planning policies and decisions should aim to ensure that developments:

- *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation*'.

The Government's [Planning Practice Guidance Conserving and enhancing the historic environment](#) expands upon the core policy principles of the NPPF and this is itself underpinned by [Good Practice Advice on planning and the historic environment](#).

Local Plan Policy

The [Current Local Plan 2001-2021](#) sets out the strategic policies to deliver conservation and enjoyment of the historic environment. It provides the strategy for the growth of the Borough, indicating what development will take place and where. Policies are not designed to prevent change rather to ensure that change is managed in the interests of today's residents and those of future generations.

The Local Plan takes into account:

- The desirability of putting heritage assets to viable use, sustaining and enhancing their significance;
- The contribution that the historic environment makes to wider sustainability aims;
- The desirability of new development to contribute to local character;
- The opportunities to draw on the contribution that the historic environment makes on the character of place.

The [Current Local Plan 2001-2021](#) consists of:

- A. Core Strategy: (adopted 2008).
- B. Site allocations and proposals: (adopted 2010).
- C. Development Control Policies: (adopted 2010).

Historic Environment Policy DP14 relates specifically to heritage assets in the planning process at a local strategic level:

Policy DP14: Historic Environment Assets

Development will not be permitted that will adversely affect a listed building, a conservation area, historic park or garden or important archaeological remains. Development affecting the historic environment should seek to preserve or enhance the heritage asset and any features of specific historic, archaeological, architectural or artistic interest. In all cases there will be an expectation that any new development will enhance the historic environment in the first instance, unless there are no identifiable opportunities available. In instances where existing features have a negative impact on the historic environment, as identified through character appraisals, the Local Planning Authority will request the removal of the features that undermine the historic environment as part of any proposed development. Support will be given to the provision of creative and accessible interpretations of heritage assets.

Conservation of the historic environment will also be ensured by:

- (i) Identifying, characterising, protecting and enhancing Conservation Areas;*
- (ii) Protection and enhancement of existing buildings and built areas which do not have Listed Building or Conservation Area status but have a particular local importance or character which it is desirable to keep. Such buildings or groups of buildings will be identified through a Local List which will be adopted by the Council;*
- (iii) Preserving or enhancing Listed Buildings, Scheduled Monuments, Historic Parks and Gardens, including their respective settings, and other features which contribute to the heritage of the Borough; and*
- (iv) Known sites of archaeological importance will be clearly identified and protected, and sites that become known, whether through formal evaluation as part of a Planning Application or otherwise, will similarly be protected according to their importance.*

Heritage Statements and/or Archaeological Evaluations will be required for proposals related to or impacting on the setting of heritage assets and/or known or possible archaeological sites, so that sufficient information is provided to assess the impacts of development on historic environment assets together with any proposed mitigation measures.

A number of other development control policies, also relevant to the historic environment, heritage assets and sustainable development, are listed below:

Policy DP1 Design and Amenity; Policy DP5: Appropriate Employment Uses and Protection of Employment Land and Existing Businesses; Policy DP6: Colchester Town Centre Uses; Policy DP8: Agricultural Development and Diversification; Policy DP9: Employment Uses in the Countryside; Policy DP10: Tourism, Leisure and Culture; Policy DP13: Dwelling Alterations, Extensions and Replacement Dwellings; Policy DP21: Nature Conservation and Protected Lanes; Policy DP 22: Dedham Vale Area of Outstanding Natural Beauty; Policy DP23: Coastal Areas.

Sources of Information

The Council's [Archaeological Advisor](#) provides advice on the archaeological impact of planning applications in the Borough. Colchester Borough Council's [Historic](#)

[Buildings and Areas Officer](#) provides advice and guidance on the impact of planning proposals affecting designated historic buildings and conservation areas. Owners of historic properties are encouraged to seek early advice regarding the possible impacts of renovation or alteration. The Council also provides in-house specialist [urban design](#) and [landscape advice](#).

A close working relationship between urban designers and architects, conservation officers, archaeologists and landscape planners helps to produce high-quality solutions which respect and enhance the historic environment while maintaining the distinctiveness and variety of the places which characterise the Borough.

National Heritage List for England

Historic England maintains the list of designated heritage assets, the [National Heritage List for England](#) (NHLE). This is a detailed database of listed buildings, scheduled monuments, registered parks and gardens, battlefields and protected wreck sites for the whole country, which can be interrogated online.

Urban Archaeological Database

The Council maintains the evidence base for the historic environment in an [Urban Archaeological Database](#) (UAD). This is a detailed database of recorded archaeological sites and historic buildings in the town.

The Colchester UAD contains a wide range of information about the nature and location of archaeological sites, find spots, monuments and buildings of architectural and historic interest - both designated and non-designated heritage assets - from the Palaeolithic to the 20th century. Consequently, the UAD records information about Roman buildings as well as post-medieval industrial buildings in the town; together, they contribute to the distinctive historic character of the town.

The UAD is used by the Council's Archaeological Advisor to identify and assess sites at risk of damage by new development. It has formed the basis for a detailed assessment of the archaeology of Colchester. The synthesis of the information recorded in the UAD, completed in 2002, resulted in *Colchester Fortress of a War God: An Archaeological Assessment*, by Adrian Gascoyne and David Radford (edited by Philip Wise) (2013). This and other high-level historical, environmental and archaeological research, underpins the evidence base for the historic environment in the town. Nearly all of the archaeological investigation in Colchester in the last 50 years has been undertaken by the [Colchester Archaeological Trust](#) and their reports are available [online](#).

Essex Historic Environment Record

In addition to the UAD for the town, the [Essex Historic Environment Record](#) (EHER), maintained by Essex County Council, is the inventory of all known archaeological sites and historic buildings outside the town. Together with the [National Heritage List for England](#) (NHLE), these form the evidence base for determining the potential impact of new development proposals on the historic environment.

The Colchester UAD and Essex HER are databases of the known and recorded heritage assets in the Borough, and these are enhanced and updated with the

information from new discoveries. New archaeological sites are often discovered during investigations in advance of new developments and as a requirement of planning conditions. In some instances new sites are discovered as a result of systematic research projects, and also sometimes by chance discovery.

A summary of each new project is also published in the annual round-up of investigations in the *Transactions of the Essex Society for Archaeology and History* published by the [Essex Society of Archaeology and History](#). Where appropriate, reports on significant new discoveries are published in full.

There is a small charge for UAD and EHER searches undertaken in support of planning applications, and for other commercial purposes, by [Colchester BC](#) and [Place Services, Essex CC](#), to recover costs for staff time to undertake searches and extract data for developers, their agents and archaeological contractors. Discretionary charges also apply for non-commercial enquiries.

For new planning applications, where there are implications for the historic environment, funding will be sought through developer contributions to enhance the Colchester UAD with the results of the archaeological investigations.

For personal research, the Colchester UAD and Essex HER are available online via the [Heritage Gateway](#). The data on this website provides a summary of the information and is not suitable for planning purposes.

Local List

As well as the relatively small number of designated heritage assets, there are a large number of non-designated heritage assets in the Borough. Non-designated or local heritage assets do not have a statutory basis for their protection but which nevertheless show a distinctive historical or architectural character.

A list of [Locally Listed Buildings](#), in addition to the statutory list, is maintained by the Colchester Historic Buildings Forum. Locally listed buildings are an important part of Colchester's heritage owing to their local architectural or historic significance. The Council encourages proposals to be submitted for new buildings or assets which ought to be added to the Local List.

Although buildings on the local list have no form of statutory protection (they are non-designated heritage assets), their status is a relevant consideration in any planning application. As with Statutorily Listed Buildings, any works carried out should preserve or enhance the building and any features of architectural or historic interest should be retained and appropriate materials used for renovation.

The extent and area of the locally listed buildings in Colchester can be found on the [Colchester's Interactive Map](#) page. The local list currently covers the town and will be extended to the rest of the Borough.

The known and recorded sites are likely to represent only a small proportion of the total within the Borough, but it is difficult to establish how representative they are. There are likely to be a large number of archaeological remains still to be discovered, some of which may be of schedulable quality, buried below existing buildings and open spaces within the town and villages and below fields in rural areas.

Heritage at Risk

The [Heritage at Risk](#) Programme, managed by Historic England, highlights the plight of designated heritage assets at risk of being lost as a result of neglect, decay or inappropriate development, with the aim of initiating action towards securing their long term conservation.

Heritage buildings that are in use are much more likely to be subject to an appropriate management and maintenance regime than vacant buildings and so securing a positive use for heritage buildings is an important part of the management of Colchester's heritage. This ensures they will remain open for the appreciation and enjoyment for residents and visitors, helping to conserve and enhance Colchester's heritage.

There are currently ten designated heritage assets within the Borough on the [Heritage at Risk Register](#) - four listed buildings, three scheduled monuments and three conservation areas.

Aerial Photographic Record

The archaeological resource of the Borough has been enhanced by archaeological aerial photography. Aerial photography has made some spectacular discoveries and has advanced the number of archaeological sites across the Borough. These have been catalogued and mapped by Essex County Council and copies of the maps are available from the [Essex Historic Environment Record](#). Historic aerial photographs dating back to the 1950s are also held by [Colchester and Ipswich Museums Service](#).

Archaeological remains defined as cropmarks by aerial photography are often difficult to date without intrusive archaeological investigation (i.e. sample excavation). Linear cropmarks defining the ditches of trackways and enclosures, could be late prehistoric, Roman, medieval or later, in date. The morphology of some distinctive cropmarks is suggestive of particular types of archaeological remains. Cropmarks of ring ditches, for example, are probably the below-ground archaeological remains of Bronze Age barrows, funerary mounds covering single or multiple burials.

At Boxted Cross, above the Black Brook (a tributary of the River Stour), the buried remains of a Neolithic henge monument is recorded as cropmarks by aerial photography (NHLE no. 1019078). The henge, a ditched enclosure some 40m in diameter, with two opposing entrances to the north and south, was defined by a ditch 5m wide that would have had an external bank. Henges are ritual or ceremonial centres which date to the Late Neolithic period (2800-2000 BC). As one of the few types of identified Neolithic structures and in view of their comparative rarity, all henges are considered to be of national importance. The henge is not visible on the ground, although its infilled ditches and central pit-like features can clearly be seen from the air as cropmarks.

Historic Landscape Characterisation

The [Historic Landscape Characterisation](#) (HLC) was undertaken for the whole county by Essex County Council between 2000 and 2005 to increase understanding of the historic landscape, using historic and modern maps to identify and map the historic character of the landscape through the application of defined Historic Landscape Character types. The types of rural landscape have been characterised into broad

groups based on the way in which they were formed, their current and earlier land uses and their physical appearance. The information from the HLC formed an important element of the Historic Environment Characterisation Project.

Historic Environment Characterisation

The Colchester Borough [Historic Environment Characterisation Project](#) was prepared by Essex County Council Historic Environment Team (now Place Services) in 2009, to provide an evidence base for the creation of the Local Development Framework. It provides a summary of the historic environment, using a map-based classification system for different historic character areas across the Borough.

[Townscape Character Assessments](#) for Colchester, Tiptree, West Mersea & Wivenhoe were produced by Chris Blandford Associates in 2006.

Portable Antiquities Scheme

The [Portable Antiquities Scheme](#) (PAS) is a DCMS-funded project, coordinated by the British Museum and locally managed, which aims to encourage the voluntary recording of archaeological objects found by members of the public. The PAS in Essex is managed by Colchester and Ipswich Museums Service, which also acts as the reporting centre for treasure finds in the county. The PAS database holds over 2,000 records of archaeological artefacts, the majority of which are metal objects discovered by metal-detecting on agricultural land, in the Borough and supplements the data held in the UAD and HER.

Essex Record Office

The [Essex Record Office](#) is the central repository for resources about the history of the County, its people and buildings. The Essex Record Office holds archives encapsulating the experiences and accomplishments of Colchester's people. In addition, [The National Archives](#) also curates a large collection of records relating to the Borough.

[Colchester & Ipswich Museums Service](#) also hold a collection of paintings, drawings, prints and photographs which relate to the history and topography of Colchester. There is also an extensive archaeological library.

How are new planning applications determined?

Decisions relating to new development will be carefully assessed in accordance with the NPPF and also in accordance with the Local Plan.

Paragraphs 128 and 129 of the NPPF state that the significance of any heritage assets (both directly and indirectly) affected by new development is fully understood:

128. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to

understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

129. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

Development that causes substantial harm or total loss, either directly or indirectly, to the significance of any designated heritage asset will be granted in only exceptional circumstances (NPPF paragraph 133). Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal (NPPF paragraph 134).

In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be made by the Council, having regard to the scale of any harm or loss and the significance of the heritage asset (NPPF paragraph 135).

Where planning consent is granted, and where there is harm or loss, either directly or indirectly, to the significance of any heritage asset, the Council will:

require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible (NPPF paragraph 141).

Copies of evidence should be deposited with the relevant Historic Environment Record, and any archives with a local museum or other public depository (NPPF paragraph 141 footnote).

Opportunities should be identified in planning applications, often informed by a heritage statement (see below), for sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

How is Archaeological Potential identified?

The known and recorded archaeological sites are likely to represent only a small proportion of the total within the Borough and the majority of new discoveries, however, are the result of piecemeal investigations. There are likely to be a large number of archaeological remains still to be discovered, buried below existing buildings and open spaces within the town and villages and below fields in rural areas.

Consequently, for many new planning applications, a heritage assessment that includes archaeological field evaluation may be required even if there are no recorded heritage assets within or close to the site.

As a guide, all applications resulting in ground disturbance, listed below, are likely to require some form of archaeological investigation, although the extent of investigation will be determined by the particular circumstances:

- within the centre of Colchester;
- within historic settlement cores defined as Conservation Areas;
- within 100m of a recorded heritage asset;
- for applications over 0.50 ha. in size;
- within locations that are topographically favourable for early occupation, for example, within or above river valleys (and where there is potential for waterlogged deposits).

All enquiries will be dealt with on a case by case basis and measured against information about the site itself and the area as a whole.

Heritage Statements

Development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they effect.

In accordance with the NPPF (paragraphs 189-195), early consultation with [Colchester BC](#) is encouraged in order to improve the efficiency and quality of the planning application process.

A [Heritage Statement](#) will be required where a planning application has the potential to impact on a heritage asset (or potential asset), either directly or indirectly. This will ensure that the potential impact can be fully understood before a planning application is determined. For historic buildings and applications within conservation areas, the Council's [Historic Buildings and Areas Officer](#) will advise on the content of a heritage statement to accompany a planning application. For archaeological sites and historic landscapes, the [Archaeological Advisor](#) will advise on the content of a heritage statement.

In accordance with the NPPF (paragraph 128), the Heritage Statement must be proportionate to the importance of the heritage asset, and its setting, affected by the proposals and will vary according to the particular circumstances of each application.

The preparation of an archaeological desk-based assessment (DBA), or cultural heritage assessment, will be often required for large developments, to gather the baseline information and establish / characterise the heritage resource, and to establish the impact (both directly and indirectly) of the development on the heritage assets, and also to determine the potential for further, previously unknown heritage assets to be present. This study must be prepared by a suitably qualified archaeological consultant or contractor.

The DBA will collate existing written, graphic, photographic and other information in order to identify and characterise heritage assets, and to identify the character of the

study area. The Desk-based assessment will collate existing information about the site, including interpretation of geotechnical information. Desk-based assessment will normally cover a wider area to situate a development proposal in the wider landscape context.

In terms of Listed Buildings, the assessment will need to take into account the setting of each heritage asset, and the wider environment in which each asset is situated; Historic England should be engaged for discussion at an early stage for projects affecting Grade I and II* Listed Buildings.

In terms of applications for hedgerow removal, a historic map survey must be undertaken to establish the date of the hedgerow.

Archaeological Evaluation

The discovery of archaeological remains can be unpredictable and it is therefore important that early advice is sought regarding the possible archaeological implications of development.

An archaeological evaluation may be required within a proposed development site that possesses known archaeological remains, or where there is good reason to believe remains will be present. The need for, and type of, archaeological evaluation will be determined by the Council. The decision will depend on the size and complexity of the development, combined with other information such as the type and extent of current and previous land use, soils and geology, and also any existing archaeological and/or historical information relating to the site. In the case of minor applications, such as small extensions, normally, an evaluation will not be required.

An evaluation will normally consist of one or more of the following surveys for major developments, with the results of each survey informing the next stage of evaluation: geophysical survey, topographic survey, fieldwalking and metal-detecting survey, palaeoenvironmental assessment and trial-trenching.

Fieldwalking and metal-detecting surveys may be requested on large rural, greenfield sites, where ground conditions are appropriate, to recover archaeological objects in the topsoil or agricultural horizon and to identify potential concentrations of material (these surveys can be undertaken on tilled ground, but not on pasture). Together, these can be a rapid and cost-effective method of detecting buried archaeological remains. Where there are surviving earthworks, potentially of historic significance, a detailed topographic survey will be required.

Geophysical survey will often be required on large and/or on rural sites, undertaken by a specialist contractor. This can be a rapid and cost-effective method of detecting and mapping buried archaeological remains, such as pits, ditches, walls, floor hearths, kilns and roads. In some instances, targeted earth resistance survey and/or ground-penetrating radar may be requested.

In the floodplains of the watercourses within the Borough - principally, the Rivers Stour and Colne and Roman River and their tributaries, as well as the Strood and Salcott Channels, there are likely to be palaeoenvironmental and geoarchaeological remains, with the potential to inform our understanding of past environments, palaeoclimates, sea-level changes and human interaction. A palaeoenvironmental assessment will be required within the floodplains of watercourses, undertaken by an archaeological specialist, where there is potential for encountering waterlogged

organic deposits, peat deposits and alluvial deposits. Often, coring will be required in transects across a floodplain, indicated by the mapped flood zones, or trial-trenched evaluation.

The standard method of evaluating a proposed development site is by trial-trenching or test-pitting, to test the results of the non-destructive surveys. Sometimes, this may be the sole evaluation technique used, for small sites and/or where other survey techniques cannot be used. Where trial-trenched is specified, a sample of 5% will be required by the Council to provide an assessment of a site. This will normally be reduced to 3.5% where geophysical survey has been already undertaken.

Trial-trenched evaluation will be often required in two stages, pre and post determination (sometimes referred to as stages 1a and 1b). Normally, the pre-determination trenching will be a lower percentage (1%), often used in conjunction with (and following) geophysical survey.

- Pre-determination trenching or test-pitting is used to assess whether or not there are any 'show-stoppers' on the site, i.e. archaeological remains of national importance, that would prevent development outright (leading to refusal of planning permission).
- Assuming planning consent is granted, the pre-determination evaluation will be followed by further trial-trenching (normally a further 4% sample) to ensure the site has been adequately assessed.

In some instances, the trial-trenched evaluation may be required as a condition of the planning consent. In the case of a single new building within an existing settlement, where there is archaeological potential, a single trial-trench will be required across the foot-print of the proposed building; this is not normally required in advance of planning consent. Where trial-trenching is required as a condition of planning consent it is because the risk of encountering 'show-stoppers' of national importance is considered to be negligible, but there may still be potential for encountering non-designated heritage assets.

If an archaeological evaluation is required, whether or not it is pre or post determination, it is often in an applicant's interest to undertake the trial-trenched evaluation at the earliest opportunity to ensure that the potential archaeological implications, and resources to deal with them, are quantified at an early stage, as part of the risk management. Archaeological excavation, in particular, can have considerable cost and time implications and the archaeological fieldwork must be completed prior to commencement of the development.

In all cases, an archaeological brief must be prepared by the Council's Archaeological Advisor on behalf of the Local Planning Authority (LPA), in accordance with national and regional standards and guidance. In response to the brief, a suitably qualified archaeological consultant or archaeological contractor, approved by the Council's Archaeological Advisor, must be commissioned by the planning applicant to prepare a Written Scheme of Investigation (WSI) or methods statement. The WSI will need to be agreed by all parties, approved by the Council's Archaeological Advisor, and submitted to the LPA. Failure to comply could lead to rejection of the WSI, and cause delays to the project.

The Council applies modest charges, to recover costs, for scrutinising archaeological schemes that are required in advance of planning consent (i.e. pre-determination

evaluation) and by planning consent. The charges also apply to developments which fall outside planning requirements such as utility pipelines and cables.

The charge is inclusive of: production of the project brief, scrutiny of the Written Scheme of Investigation (WSI), fieldwork, assessment and reporting.

Archaeology and the planning process in ten steps:



Archaeological mitigation

Heritage assets will be protected and enhanced through the planning system, in accordance with the NPPF and the Local Plan. Planning consent is likely to be

refused where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset (NPPF paragraph 133).

In accordance with paragraphs 134 and 135 of the NPPF, where a development will cause harm to a heritage asset, the Council will weigh this against the public benefits of the proposal. A balanced judgement will be made having regard to the scale of any harm or loss and the significance of the heritage asset.

Where harm to the significance of a heritage asset cannot be avoided, mitigation will be at a scale proportionate to the development and the significance of the heritage asset.

Preservation *in situ*

There is a requirement to minimise the disturbance to all archaeological remains through preservation in their original place or *in situ*. Where remains of acknowledged national importance are discovered, there will be a requirement to ensure the remains are preserved in their current, or in an enhanced, state, so that archaeological deposits remain undisturbed and unharmed by development.

Where previously unknown archaeological deposits are discovered by evaluation and which are suspected to be of national importance, Historic England will be the arbiter as the body that administers all the national designation regimes.

This can be achieved by:

- Avoiding development altogether in the area containing the buried archaeological remains, for example by designing an open area (without any groundworks) to coincide with the area of archaeological remains.
- Where avoidance is not possible,
 - designing foundations that carefully avoid damage to archaeological remains, for example, by raising the ground level to protect buried archaeological remains. In this case, a protective buffer of undisturbed overburden soil, normally considered to be around 300mm in thickness, between the uppermost archaeological horizon and the base of the construction formation level, will be required to adequately protect archaeological remains from damage;
 - designing foundations that minimise damage to the remains (a balanced trade-off to result in a loss of no more than 2% of the site), for example, by reusing existing foundations and existing service trenches, by the use of different piling configurations and/or by reducing the depth of ground beams and pile caps, combined with archaeological monitoring and recording before or during groundworks where there is an impact on buried archaeology.

Full archaeological excavation and recording can be both time-consuming and costly. Therefore, development schemes that are designed to minimise the impact on archaeological remains, can also be beneficial economically to developers. Again, early consultation, and early assessment, can help to identify the archaeological implications of a development site at an early stage, so that archaeological remains

can be preserved and enhanced within (or below) the scheme, i.e. archaeology can be designed out of a scheme at an early stage.

Within Colchester's historic town centre, where there are deep and often well-preserved stratified archaeological deposits up to 2.5m deep in places, piling is the preferred foundation system, to preserve the majority of archaeological remains *in situ* (while acknowledging that foundations might damage buried deposits). Preservation by record, i.e., full excavation, will only be permitted in exceptional cases within the area of the Roman walls; it is also likely to be prohibitively expensive for most developments.

Preservation by recording (excavation)

In many situations, and only where archaeological remains are considered to be of local or regional rather than national importance, it may be possible to secure a programme of archaeological recording as a condition of any planning consent in accordance with the NPPF (paragraph 141).

The following condition relating to archaeological investigation will be normally attached to the planning consent:

No works shall take place until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation that has been submitted to and approved, in writing, by the Local Planning Authority (LPA). The Scheme shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording*
- b. The programme for post investigation assessment*
- c. Provision to be made for analysis of the site investigation and recording*
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation*
- e. Provision to be made for archive deposition of the analysis and records of the site investigation*
- f. Nomination of a competent person or persons/organisation to undertake the works*

The site investigation shall thereafter be completed prior to development, or in such other phased arrangement, as agreed, in writing, by the Local Planning Authority. The development shall not be occupied or brought into use until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Colchester Borough Council's Core Strategy (2008).

This standard condition covers most situations relating to the process of archaeological investigation. In certain circumstances, this condition may be varied to accommodate particular requirements.

In the case of small extensions to existing buildings, it is sometimes possible to secure adequate mitigation through continuous archaeological monitoring and recording during the groundworks for the development.

In every case, an archaeological brief must be prepared by the Council's [Archaeological Advisor](#), based on the results of the archaeological assessment (desk-based assessment and evaluation). In order to prepare a brief, the Archaeological Advisor will require details about all groundworks and will require a detailed set of plans and sections (both current and proposed), as well as geotechnical information.

In response to the brief, the archaeological consultant or archaeological contractor will be required to prepare a Written Scheme of Investigation (WSI) or methods statement, which will need to be agreed by all parties, approved by the Council's Archaeological Advisor, and submitted to the LPA. The Council's Archaeological Advisor will be able to advise the LPA that the condition can be partially discharged at this stage, on the basis that an appropriate scheme of work is in place, to enable the investigation to be carried out.

Full discharge of the condition will only be approved once the agreed scheme of work has been satisfactorily completed (fieldwork, reporting and archiving). However, the development will normally be able to commence once the fieldwork stage of the investigation has been adequately completed. For large and complex projects, it is normally possible to agree a staged release of a development site, if the field investigations are undertaken progressively and systematically, to avoid unnecessary delays to development.

The WSI will *provide the basis for measurable standards* and will be used to establish whether the requirements of the planning condition will be adequately met. If the approved WSI is not carried through in its entirety, the condition will not be discharged. The Archaeological Advisor will monitor the fieldwork to ensure that the archaeological work specified in the WSI is carried out.

Building Recording

In the case of buildings impacted by development that are of potential historic interest (normally any building that is shown on the 1880s OS maps and/or earlier maps), a heritage appraisal will be requested to establish the character and the significance of the building, and the impact of the proposed works on the building. In every case, this piece of work must be undertaken by a historic building specialist. The Council's [Historic Buildings and Areas Officer](#) and [Archaeological Advisor](#) will be able to provide advice and guidance on this work, and about specialists that routinely undertake this work. Where major alterations are required, for example, where conversion of a historic barn has been approved, a historic building record will often be required before planning consent is granted in order to establish the heritage implications of the development.

English Heritage (now Historic England) has defined the different levels of recording for historic buildings in [Understanding Historic Buildings: A Guide to Good Recording](#)

[Practice](#) (English Heritage 2006). In general, a listed building will require a higher and more detailed level of recording than a non-designated building.

Countryside Advice

Sustainable development is an important objective in rural as well as urban settings. Many archaeological sites and historic landscape features are recorded in the countryside, especially within river valleys which are topographically favourable for early occupation of all periods. Many of the archaeological sites are recorded only as cropmarks by archaeological aerial photography. Few earthworks survive due to intensive agricultural regimes since the medieval period.

[Countryside stewardship grants](#) are available for the protection of historic and archaeological features and also for historic building restoration. Advice and assistance with the heritage element of agri-environment schemes is available, including farm audits and management plans. The Council can identify sites of interest and show how the conservation of historic features can be accommodated within good agricultural practice.

Colchester Borough has experienced extensive mineral extraction to the west and south-west of the town, in the parishes of Stanway and Birch. This work has afforded the opportunity to undertake some large-scale archaeological investigations. Essex County Council are the Mineral Planning Authority and as such [Place Services, Essex CC](#) are responsible for providing advice on the significance and management of historic remains relating to the minerals industry in the Borough. [Historic England](#) provides advice on the management of historic remains relating to the minerals industry.

Important Hedgerows

The Council's Archaeological Advisor also provides advice on countryside hedgerows. Under [The Hedgerows Regulations 1997](#) important hedgerows are protected from being removed. In terms of the historic environment, a hedgerow is considered important if it is at least 30 years old and meets one of the following criteria:

- marks a pre-1850 parish/township boundary, or part of it;
- incorporates a Scheduled Monument or an archaeological feature recorded 'at the relevant date' in a Historic Environment Record.
- marks the boundary of a pre-1600 estate or manor or is visibly related to any building or other feature of such an estate or manor.

Places of Worship and planning

The [Diocesan Advisory Committee for the Care of Churches](#) or DAC is a statutory body providing advice on the architecture, archaeology, art and history of places of worship; the care and maintenance of church buildings and their contents; and the care and maintenance of churchyards.

The Council's Archaeological Advisor provides the archaeological advice for churches in the Colchester Archdeaconry, within the Diocese of Chelmsford. This advice is provided in accordance with the approach outlined in Guidance Note 1 (2004) of the Association of Diocesan and Cathedral Archaeologists, [Archaeological requirements for works on churches and churchyards](#).

Public Benefit

Provision should be included in every project for public benefit, because archaeological excavations can reveal a wealth of new information that will usually attract a great deal of local, and sometimes national, attention. This might take a variety of forms of communication and engagement, appropriate to the project.

For excavations, and where health and safety conditions permit, it is expected that arrangements will be made for a site 'open day' to promote the archaeological discoveries. If there is a local school, it might be appropriate to arrange a learning opportunity for young people. In some locations, within the town, a viewing platform might be provided for the public to watch the investigations in progress. Once the on-site excavation has been undertaken, and assessment completed, it might be appropriate to hold a community presentation (or presentations). In some cases, for significant discoveries, press coverage might be appropriate.

All excavations must be followed by a post-excavation assessment to assess the significance of the findings, unless otherwise agreed in writing with the Council. This will normally lead to a programme of post-excavation analysis, reporting and where appropriate publication, and archiving. The programme of post-excavation analysis will need to be agreed by all parties before this work commences, detailed in an updated WSI. The condition will be discharged at this stage, on the basis that an appropriate scheme of post-excavation and recording is in place, to enable the archaeological work to be completed, without causing delay to the development.

Where appropriate, opportunities will be sought through planning obligations for developer contributions for the provision of displays and interpretation of new and important archaeological discoveries. In some cases, this might be through the conservation, display and interpretation of archaeological remains *in situ*, where public access is possible without detriment to the site. It might be through the provision of display cases for the archaeological objects or for interpretation panels within, for example, publically accessible buildings on or close to the site of the discoveries, or within other appropriate venues, for example, Colchester Castle Museum.

Curation of archaeological archives

All finds and archives from archaeological investigations in Colchester are held by [Colchester and Ipswich Museums Service](#). They comprise one of the finest and most extensive collections of, in particular, Iron Age and Romano-British archaeology in the country. For all new projects, an archive of all records and finds must be prepared, and agreement must be sought, before the project commences, for transfer of ownership and deposition of the entire archive with [Colchester and Ipswich Museums Service](#) after the investigation has been completed. Colchester

and Ipswich Museums Service will accession the archive into their collection, held in a secure storage facility, and make them available for display and study.

For major projects, funding will be sought through a planning obligation for the long term curation and storage of the archive generated by the investigation.

Glossary

Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.

Conservation (for heritage policy): The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Designated heritage assets: Nationally important listed buildings, scheduled monuments, registered parks and gardens, battlefields and protected wreck sites which enjoy statutory protection.

Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Historic environment record: Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.

Non-designated heritage assets: Buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets.

Planning obligation: A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

Who should I contact for further information?

If you have any queries about archaeological investigation in the Borough, please contact:

Jess Tipper, Archaeological Advisor, Colchester Borough Council, Rowan House 33 Sheepen Road, Colchester CO3 3WG
tel: 01206 508920
Email: jess.tipper@colchester.gov.uk

Libby Kirkby-Taylor, Historic Buildings and Areas Officer, Colchester Borough Council, Rowan House 33 Sheepen Road, Colchester CO3 3WG
tel: 01206 506374
Email: Libby.Kirkby-Taylor@colchester.gov.uk

Paul Sallin, Urban Designer, Colchester Borough Council, Rowan House 33 Sheepen Road, Colchester CO3 3WG
tel: 01206 505859
Email: paul.sallin@colchester.gov.uk

Adam John, Landscape Planning Officer, Colchester Borough Council, Rowan House 33 Sheepen Road, Colchester CO3 3WG
tel: 01206 282472
Email: adam.john@colchester.gov.uk

In addition to the Strategy, the Council's document [Archaeology and the Planning Process](#) provides further useful information for individuals thinking about a development proposal.

You can find out more about designated heritage assets from Historic England. The National Heritage List for England (NHLE) is the official and up-to-date database of all nationally designated heritage assets and contains a map and description of all designated assets. The List can be viewed at:
<https://www.historicengland.org.uk/listing/thelist/>

Information on Scheduled Monuments, and the different consents required for carrying out works, can be obtained from Historic England at:
<https://www.historicengland.org.uk/advice/hpg/>

Deborah Priddy, Inspector of Ancient Monuments, Historic England (East of England), 24 Brooklands Avenue, Cambridge CB2 8BU
tel: 01223 582720
Email: Debbie.Priddy@english-heritage.org.uk

[Historic England](#) (formerly English Heritage) has produced advice on a wide range of topics while both the [Chartered Institute for Archaeologists](#) and the [Institute for Historic Building Conservation](#) has produced a range of Standards and Guidance for the sector.

A copy of *Guidelines on the Preparation and Transfer of Archaeological Archives to Colchester Museums* can be obtained from Stephen Yates, Documentation Officer, Colchester and Ipswich Museums, Museum Resource Centre, 14 Ryegate Road, Colchester CO1 1YG

tel: 01206 282471

Email: stephen.yates@colchester.gov.uk

The Chartered Institute for Archaeologists can be contacted at <http://www.archaeologists.net/> or 0118 378 6446

The current Local Plan 2001-2021 is available at <http://www.colchester.gov.uk/ldf>

Further information about Historic England, Heritage Protection and designation can be found on the Historic Environment Local Management (HELM) website:
[http://www.helm.org.uk/managing-and-protecting/heritage-protection/English Heritage](http://www.helm.org.uk/managing-and-protecting/heritage-protection/English%20Heritage)

The National Planning Policy Framework is available from the following website:
[https://www.gov.uk/government/publications/national-planning-policy framework--2](https://www.gov.uk/government/publications/national-planning-policy-framework--2)

5 October 2015

Report of	Head of Commercial Services	Author	Sandra Scott 01206 282975
Title	Consultation Responses to the Draft Strategic Land Availability Assessment and Sustainability Appraisal / Garden Settlements Frameworks		
Wards affected	All		

The Local Plan Committee is asked to note the responses to the consultation

1. Decision(s) Required

- 1.1 To note the summary of the consultation responses for information.

2. Reasons for Decision

- 2.1 The Sustainability Appraisal (SA) and Strategic Land Availability Assessment (SLAA) are both statutory requirements and procedures must comply with guidance and legislation set out nationally, which includes the need to carry out consultation. Amendments have been necessary to ensure appropriate criteria is in place against which proposals for Garden Settlements can be assessed.

3. Alternative Options

- 3.1 The feedback could not be reported for information which could reduce understanding and clarity in respect of framework for the SLAA and SA Assessment Frameworks.

4. Supporting Information

- 4.1 The National Planning Policy Framework (NPPF) came into effect on 27th March 2012 and is a material consideration in planning decisions. It sets out the requirements for the preparation of Local Plans.
- 4.2 The Strategic Land Availability Assessment will be carried out in accordance with the National Planning Practice Guidance (<http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/>)
- 4.3 As part of the process of developing the evidence to support the production of the Local Plan, the Council must carry out a Strategic Land Availability Assessment and a Sustainability Appraisal. In order to ensure a fair and comprehensive approach and to be clear in the process of developing the Plan, Colchester Borough Council carried out a consultation on draft frameworks for these two processes, to be used in the assessment of sites being considered for allocation.

A six week consultation period for both consultations ran from Monday 27 July to 5pm on Monday 7 September.

4.4 *Summary of responses*

A small number of responses to the consultation were received on both these documents which is unsurprising given the technical nature of the Sustainability Appraisal and Strategic Land Availability Assessment (SLAA). A total of 6 responses were made to the Sustainability Appraisal assessment framework which included the draft Garden Settlement assessment framework. 5 responses were made on the SLAA criteria. Of these responses there was significant overlap, with most respondents replying to both consultations.

- 4.5 A full summary of the comments received is provided in tables 1 and 2 in Appendix 1. General support for the criteria was expressed in some cases with points relating to matters of detail. Most of the responses raise relevant issues which are appropriate for inclusion as assessment criteria. On the whole the detailed points made refer to issues of detail which are already covered either directly or indirectly by existing criteria and the relevant evidence which will be required to assess specific proposals.

5.0 **Proposals**

- 5.1 A number of issues raised are considered to merit further consideration and could refine and improve the criteria. These are summarised below and will require further consideration and dialogue with respondents to potentially agree detailed minor amendments and to incorporate additional or revised questions;

- Additional criteria to assess deliverability eg can this development deliver what the town needs? Is there an appropriate delivery vehicle in place?
- Clarification in respect of reference to “publicly accessible open space”
- Confirmation in respect of suggested additional sources of information.
- Additional criteria related to an increase in community facilities, visual impact on the settlement and surrounding countryside and impacts on the distinctive setting of the settlement.

- 5.2 Potential for such amendments will be considered and changes made accordingly following thorough consideration on the detail and consequential implications. Where appropriate these will be incorporated into the Sustainability Appraisal and Assessment criteria which will be the subject of further consultation at later stages of the plan making process.

6. **Strategic Plan References**

- 6.1 The Sustainability Appraisal is a robust assessment process to balance the social, environmental and economic considerations in planning for the future of the area. The assessment criteria for the SLAA also follows these themes against which to assess the suitability of sites for future development. As such the assessment frameworks cross over the four key themes of the Strategic Plan in promoting Colchester as Vibrant, Prosperous, Welcoming and Thriving with the intention of ensuring that the emerging Local Plan helps to achieve the objectives of the Plan.

7. **Consultation**

- 7.1 There is no requirement to further consult on the responses to the consultation on the SLAA / SA Frameworks.

8.0 Publicity Considerations

- 8.1 It is considered unlikely that the consultation on the SLAA / SA Frameworks will attract publicity.

9. Financial Implications

- 9.1 There are no identified financial implications to the Council.

10. Equality, Diversity and Human Rights implications

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

11. Community Safety Implications

- 11.1 None.

12. Health and Safety Implications

- 12.1 None

13. Risk Management Implications

- 13.1 Ensuring members are fully briefed on planning decisions and relevant policies in the Local Plan will help reduce the risk of inappropriate development being permitted.

14. Disclaimer

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

Appendices

Appendix A – *Tables 1 and 2 Summary of Consultation Responses Strategic Land Availability Assessment and Sustainability Appraisal / Garden Settlements Frameworks*

Appendix A

Summary of Responses to the Consultation on the Garden Settlement Framework and Sustainability Appraisal Assessment criteria

The consultation invited comments on the Sustainability Appraisal Site Assessment Pro-forma and the approach for the assessment of Garden Settlements. These were an addendum to the original Scoping Report. Consultees were invited to consider the following in their responses:

1. Is the range of site assessment criteria appropriate?
2. Are the sources of information used adequate to address all relevant sustainability issues?
3. Are there any additional criteria that would be appropriate to add, or that could or should replace any of the existing site assessment criteria?
4. Does the framework for the assessment of the Garden Settlements, with the inclusion of an additional sustainability objective, represent an appropriate way of assessing Garden Settlement sites?

Table 1 Sustainability Appraisal / Garden Settlement Framework

Respondent	Summary of comments
CAUSE (Campaign Against Urban Sprawl in Essex)	<p><i>Is the range of site assessment criteria appropriate?</i></p> <ul style="list-style-type: none"> • The criteria in the assessment is too detailed for this stage of the plan preparation; • The analysis will be fragmented rather than looking at potential area as a whole; • High level questions need to be asked first in relation to how best to make North Colchester a good place to live and deliver the right types of houses and jobs with delivery of appropriate infrastructure. <p><i>Are the sources of information used adequate to address all relevant sustainability issues?</i></p> <ul style="list-style-type: none"> • Agree with the addition of 3 further documents; • The Campaign for Better Transport's 2014 Car Dependency Scorecard • Freiburg: City of Vision • The Town and Country Planning Association's "Re-imagining garden cities for the 21st century: benefits and lessons in bringing forward comprehensively planned communities", <p><i>Are there any additional criteria that would be appropriate to add, or that could or should replace any of the existing site assessment criteria?</i></p> <ul style="list-style-type: none"> • Overall view is that too detailed at this stage but suggest some revisions as follows; Increase emphasis on regeneration and use of brownfield land and evidence that this has been exhausted; • Does the development meet local housing need? • Does the development allow links with other employment areas or will it stand alone? • Will it provide high skilled jobs • Additional criteria suggested to assess deliverability to cover- can this development deliver what the town needs? and is there an appropriate delivery vehicle in place? • The definition of affordable housing should also include market housing to meet all needs to ensure needs are met in the right

	<p>place with the right type of homes;</p> <ul style="list-style-type: none"> • Transport criteria to be refined to place greater emphasis on connections from development to Colchester; • Reverse questions for criteria 11 and add further point – will this development support Colchester and its growth <p><i>Does the framework for the assessment of the Garden Settlements, with the inclusion of an additional sustainability objective, represent an appropriate way of assessing Garden Settlement sites?</i></p> <p>Too detailed for assessment at this stage of the process</p>
Wivenhoe Society	<p>The Wivenhoe Society is concerned that the assessment criteria do not specifically consider the impacts on the existing road networks and that a criterion should be included to take account of the likely effects on road congestion of large scale developments of the garden settlement type. To assess such effects the Borough needs an adequate data base detailing existing traffic flows and destinations and data on the potential for improvements to the road network and traffic management.</p>
Mersea Homes	<p>Concerns expressed as follows;</p> <p>In most instances the sites will be very close to each other and scheduled for the same amount of development, the Site Assessment Framework's objectives do not separate out the choices. If you actually try to apply the 10 objectives to sites in many cases the scoring will come out too similar to give useful results.</p> <p>Consider that a much finer grain of assessment is needed and would think relevant objectives and assessment criteria should also include:</p> <ol style="list-style-type: none"> a. Visual impact on settlement and or surrounding countryside b. Ability to fit within existing settlement pattern context c. Location in relation to delivery of community facilities [for urban sites / larger villages]. d. Offers safe access to existing community centre / facilities e. Scale of visual impact when compared with existing settlement. f. On balance which option would generate the least harm and deliver the greatest benefits. <p>In contrast our general thoughts on the outcome for the 10 questions in the proposed document would be:</p> <ol style="list-style-type: none"> 1. Not helpful to distinguish which option for each settlement is the most appropriate choice. 2. In most cases option sites would all score the same 3. Ditto 4. Ditto 5. Ditto with exception of delivering open space 6. Ditto 7. Depends on appropriate design, so would be the same for all options 8. Important judgement criteria 9. Relevant 10. In most cases option sites would all score the same
Office of Road and Rail	<p>No Comments</p>
Shaun Thomas	<p>Supports the Sustainability appraisal framework with the following exception;</p> <p>The assessment criteria in respect of open space are quite clear - "Will existing open spaces be protected & new open spaces be created?" and "Would the site see a loss of open space?" These tests are consistent with ensuring the Plan is compliant with the National Planning Policy</p>

	<p>Framework, para 74</p> <p>However, the Sustainability Framework then introduces the concept of "publically" accessible open space that has no significance nor reference in either National or Local Planning Policy. I strongly suggest that the Framework is revised to use those terms that are consistent with Planning Policy ie simply "open space" or "private and public open space."</p>
Irvine Road Residents Association	<p>Supports the main criteria to be used, but concerned to know why the completely irrelevant category of 'Publicly Accessible Open Space' has been added to The Sustainability Framework.</p> <p>This concept is not valid in Local or National Planning Policy and should be removed.</p>

Summary of Responses to the consultation on the Site Assessment Framework for Strategic Land Availability Assessment (SLAA) As part of the process of developing the evidence to support the production of the Local Plan, the Council must carry out a Strategic Land Availability Assessment. In order to ensure a fair and comprehensive approach and to be clear in the process of developing the Plan, Colchester Borough Council consulted on the draft framework to be used in the assessment of sites being considered for allocation. The responses received are summarised in the table below;

Table 2 Site Assessment Framework for Strategic Land Availability Assessment (SLAA)

Respondent	Summary of comments
Gladman Developments	<p>Comments on the initial sieve;</p> <ul style="list-style-type: none"> it is important when considering the issues relating to Flood Zone 3(b) that the potential for mitigation be considered when assessing sites this criteria should allow for mitigation to be provided, if necessary and practicable, to allow any site to proceed forward. with regard to the criteria regarding development boundaries we believe that this needs to be carefully assessed given the current proposals for potential new settlements, in as yet only very broad geographical locations <p>Comments on stage 2- Suitability and Sustainability</p> <ul style="list-style-type: none"> Difficulty in considering how some criteria will be assessed including; coalescence, AQMA. Consider the punitive weighting given to brownfield over greenfield sites. Weighting attributed to agricultural land classification should be carefully considered against the NPPF. Gladman consider this criteria is of limited value in assessing sites With regard to Neighbourhood Plans Gladman strongly believe that this criteria should be removed entirely from the

	<p>assessment process.</p> <ul style="list-style-type: none"> • seek clarification and the broadening out of criteria on a number of points, including; distance to town / local centre to include small clusters of retail in smaller rural locations; clarification of what is meant by “supermarket”; and broaden sources of employment especially in rural areas. • With all the criteria in this stage, there should be the opportunity to consider mitigation options. <p>Stage 6- Outcome of Assessment</p> <ul style="list-style-type: none"> • With regard to the overall assessment it is not clear from the proforma how the overall assessment will be arrived at. We would therefore consider that the proforma should be accompanied by a sheet explaining the Councils approach and the particular importance it puts on each particular criteria
Irvine Road Residents Association	<ul style="list-style-type: none"> • The planning history should summarise the relevant current policies affecting that site. • At no point is there any reference to representations made in relation to the site as part of the other Local Plan consultation processes. Surely these are material to the assessment in understanding the views of constituents? This applies to Irvine Road Orchard and representations regarding alternative uses for a community orchard suggesting designation as a Local Green Space • Would suggest a site visit is required for the assessment of the Irvine Road site
Mersea Homes	<p>Stage 2 Suitability and Sustainability</p> <ul style="list-style-type: none"> • There is too much focus on large self-contained or urban extension schemes. Villages will unavoidably score low on many of the criteria due to 'proximity' issues. This is obviously not helpful as the I&O included villages in half of the options. • What the SLAA tests do not deal with are all the reasons why there can be positive outcomes for village development which counterbalance the normal sustainability assessment criteria. For example addressing the ageing demographic, housing for young people so they can stay close to family, thresholds for community facilities, bolstering falling school roles etc. • There need to be assessment criteria which take these matters into account i.e. what positives could come from the proposed development. • The SHLAA assessment does refer village proposals back to a SA, in which case our points made on that consultation are also relevant i.e. comparing sites which are in close proximity and

	could all score the same on the 1-10 criteria.
Office of Road and Rail	No Comment
Shaun Thomas	<p>Four comments:-</p> <ul style="list-style-type: none"> the section containing the planning history should summarise the relevant current policies that affect that site. This would seem to be critical in ensuring the site assessment is made within the wider planning context. At no point is there any reference made to representations made in relation to the site as part of the other Local Plan consultation processes. Surely these are material to the assessment in understanding the views of constituents. in the case of the case of Irvine Road Orchard, I am aware that a number of responses were made to the call for sites, identifying potential alternative uses such as a community orchard and indeed suggesting designation as Local Green Space. Would suggest a site visit is required for the assessment of the Irvine Road site