

# Local Plan Committee Meeting

**Moot Hall, Town Hall, High Street,  
Colchester, CO1 1PJ  
Monday, 02 October 2017 at 18:00**

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

## Information for Members of the Public

### Access to information and meetings

You have the right to attend all meetings of the Council, its Committees and Cabinet. You also have the right to see the agenda (the list of items to be discussed at a meeting), which is usually published five working days before the meeting, and minutes once they are published. Dates of the meetings are available here:

<https://colchester.cmis.uk.com/colchester/MeetingCalendar.aspx>.

Most meetings take place in public. This only changes when certain issues, for instance, commercially sensitive information or details concerning an individual are considered. At this point you will be told whether there are any issues to be discussed in private, if so, you will be asked to leave the meeting.

### Have Your Say!

The Council welcomes contributions and representations from members of the public at most public meetings. If you would like to speak at a meeting and need to find out more, please refer to the Have Your Say! arrangements here: <http://www.colchester.gov.uk/haveyoursay>.

### Audio Recording, Mobile phones and other devices

The Council audio records public meetings for live broadcast over the internet and the recordings are available to listen to afterwards on the Council's website. Audio recording, photography and filming of meetings by members of the public is also welcomed. Phones, tablets, laptops, cameras and other devices can be used at all meetings of the Council so long as this doesn't cause a disturbance. It is not permitted to use voice or camera flash functions and devices must be set to silent. Councillors can use devices to receive messages, to access meeting papers and information via the internet. Looking at or posting on social media by Committee members is at the discretion of the Chairman / Mayor who may choose to require all devices to be switched off at any time.

### Access

There is wheelchair access to the Town Hall from St Runwald Street. There is an induction loop in all the meeting rooms. If you need help with reading or understanding this document please take it to the Library and Community Hub, Colchester Central Library, using the contact details below and we will try to provide a reading service, translation or other formats you may need.

### Facilities

Toilets with lift access, if required, are on each floor of the Town Hall. A water dispenser is available on the first floor.

### Evacuation Procedures

Evacuate the building using the nearest available exit. Make your way to the assembly area in the car park in St Runwald Street behind the Town Hall. Do not re-enter the building until the Town Hall staff advise you that it is safe to do so.

Library and Community Hub, Colchester Central Library, 21 Trinity Square,  
Colchester, CO1 1JB  
telephone (01206) 282222 or textphone 18001 followed by the full number you wish to call  
e-mail: [democratic.services@colchester.gov.uk](mailto:democratic.services@colchester.gov.uk)  
[www.colchester.gov.uk](http://www.colchester.gov.uk)

**COLCHESTER BOROUGH COUNCIL**  
**Local Plan Committee**  
**Monday, 02 October 2017 at 18:00**

**The Local Plan Committee Members are:**

Councillor Martin Goss	Chairman
Councillor Nick Barlow	Deputy Chairman
Councillor Lewis Barber	
Councillor Nigel Chapman	
Councillor Andrew Ellis	
Councillor Adam Fox	
Councillor Dominic Graham	
Councillor John Jowers	
Councillor Gerard Oxford	
Councillor Martyn Warnes	

**The Local Plan Committee Substitute Members are:**

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

**AGENDA**  
**THE LIST OF ITEMS TO BE DISCUSSED AT THE MEETING**  
**(Part A - open to the public)**

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

**1 Welcome and Announcements**

The Chairman will welcome members of the public and Councillors and remind everyone to use microphones at all times when they are speaking. The Chairman will also explain action in the event of an emergency, mobile phones switched to silent, audio-recording of the meeting. Councillors who are members of the committee will introduce themselves.

**2 Substitutions**

Councillors will be asked to say if they are attending on behalf of a Committee member who is absent.

**3 Urgent Items**

The Chairman will announce if there is any item not on the published agenda which will be considered because it is urgent and will explain the reason for the urgency.

**4 Declarations of Interest**

Councillors will be asked to say if there are any items on the agenda about which they have a disclosable pecuniary interest which would prevent them from participating in any discussion of the item or participating in any vote upon the item, or any other pecuniary interest or non-pecuniary interest.

**5 Have Your Say!**

The Chairman will invite members of the public to indicate if they wish to speak or present a petition on any item included on the agenda. Please indicate your wish to speak at this point if your name has not been noted by Council staff.

**6 Minutes of 30 August 2017**

5 - 24

The Councillors will be invited to confirm that the minutes are a correct record of the meeting held on 30 August 2017.

**7 Draft Publication Local Plan Consultation Responses**

25 - 58

A report by the Assistant Director Policy and Corporate asking the Committee to note the responses received following the consultation on the Publication Draft Local Plan.

**8 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

## Wednesday, 30 August 2017

**Attendees:** Councillor Lewis Barber, Councillor Nick Barlow, Councillor Nigel Chapman, Councillor Andrew Ellis, Councillor Adam Fox, Councillor Martin Goss, Councillor John Jowers, Councillor Gerard Oxford, Councillor Martyn Warnes

**Substitutes:** Councillor Lesley Scott-Boutell (for Councillor Dominic Graham)

**Also Present:**

### 113 Have Your Say!

**Councillor Smith (in respect of his Directorship of North Essex Garden Communities Ltd) declared a non-pecuniary interest in this item pursuant to the provisions of Meetings General Procedure Rule 7(5).**

Will Quince MP addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He explained his disappointment in the content of the draft Local Plan and the intention for it to be submitted to the Planning Inspectorate in this form. He questioned why there would be no opportunity to review its content in the light of the consideration of reports on employment and transport presented to the meeting. He was concerned about the contents of the reports given there was no mention of rail capacity, the likelihood of future residents wishing to commute to London for work and the current congestion on the rail lines. He considered these matters needed to have been considered prior to the decisions which were taken by the Committee at its meeting in June 2017.

The Chairman confirmed that partner organisations like the National Health Service and British Rail were part of the Local Plan consultation process in their own right and any concerns identified by those stakeholders would be expected to be raised within the consultation process. He also referred to existing plans for a new railway station at Marks Tey for the future.

Philip Jellard addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He explained his concerns about transport problems and lack of adequate financial contingencies associated with the West Tey Garden Community development. He considered there was a high risk of overspend on the project as the existing level of contingency was approximately 50% too low. He had requested further information on this to be made available publicly but had received no response to this request. He was of the view that the importance of ensuring the financial basis of the

proposals were sound was being overlooked and accordingly considered that the consultation could not be valid if relevant information was not being made publicly available. He sought an assurance that a full report on contingencies and details of a risk analysis would be sent to the Campaign Against Urban Sprawl in Essex (CAUSE).

The Chairman confirmed that he worked in the field of project management and fully understood the importance of appropriate and realistic financial management and project planning. He invited CAUSE to contact him direct in future if they considered they were not receiving appropriate responses to their inquiries.

Jeremy Hagon addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He had three particular concerns in relation to the consultation process which he had previously raised with the Chairman and with Councillor T. Young. These were in relation to the online questionnaire on the Council's website and the advice that had been given in response to people who wished to provide responses by email. He had been informed by the Chairman that the online response form was a requirement of the Planning Inspectorate whilst the Planning Inspectorate had indicated to him that the form was advisory only. He had also been informed by Councillor T. Young that the same consultation methods were being used by Colchester, Braintree and Tendring but he was aware that Colchester was the only one of the three Authorities which was refusing to accept responses submitted by email. He also reported that the online registration process for completion of the response form required the submission of personal details from a non-secured part of the Council's website.

The Chairman read from an extract of a letter he had received from Braintree District Council which confirmed that those people emailing consultation submissions had been advised to use the specified online form, as was the case in Colchester. He confirmed that the processes used by all three Councils for the consultation had been the same and that the specified form had been available to download for completion and emailing for those unwilling or unable to complete the form directly online. He also confirmed that he had an IT employment background as was familiar with the technical methods to securely transfer data to websites. He had tested the Council's website himself in relation to the submission of personal data for the online registration for the consultation and was able to confirm that it did use the version of HTTP.

Sir Bob Russell addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He explained that this was the seventh time he had visited the Committee and that he had attended various other meetings and workshops in relation to the emerging Local Plan. He considered that he had been wasting his time in corresponding about the prevention of development on land east of Salary Brook as he considered little attention was being placed on these views. He had also corresponded about Middlewick Ranges but was unaware as to whether his views would be taken into account or not. He felt that everyone should have an opportunity to state their view but he had no confidence in the process.

The Chairman confirmed that he was concerned about the Salary Brook and East Colchester issue and had taken it upon himself to contact David Lock Associates to state his view on the matter. In terms of the consultation process, he confirmed that any written representations would be forwarded to the Planning Inspectorate but it would be for the individual Inspector to determine whether such submissions would be taken into account or not.

Councillor Scordis attended and, with the consent of the Chairman, addressed the Committee. He referred to the Council's transport policy, particularly in relation to the Hythe area of the town. He was of the view that more rail services should be provided to the Hythe station but was aware that alternative means of transport also needed to be investigated. Safe alternative routes needed to be provided with priority given to bus lanes and cycle routes. The government had recently announced the phasing out of petrol cars which would compel car manufacturers and transport planners to consider viable alternatives. He remained concerned about the Middlewick Ranges site which had been included in the draft plan as a late addition and, as such, the detailed investigations of the site's viability were still awaited. He sought assurances that local residents groups would be actively involved in the consultation work and outcomes for the site and for the residents' views to be listened to. In relation to the consultation process, he was aware that the use of technical planning terminology had alienated certain members of the public and considered as much assistance as possible needed to be provided to help people take part in the process.

The Chairman confirmed that there were issues in relation to the inclusion of the Middlewick Ranges site in the draft Plan but he was conscious that its removal from the process ran the risk of an appeal by the Ministry of Defence and the potential for the Council to lose the responsibility for an appropriate and realistic allocation for the site. He agreed with the need to involve residents in the further work on Middlewick Ranges and invited Councillor Scordis to make arrangements within the ward to ensure the residents groups were appropriately represented.

Councillor Smith attended and, with the consent of the Chairman, addressed the Committee. He thanked the Committee members, officers of the planning team and members of the public for the work put into the compilation of the Draft Local Plan up to this stage. An announcement had recently been made signalling an increase in the national housing target to 250,000 and he was aware that in areas where Council's had failed to deliver a sound Local Plan, the Government had forced one upon them. He was pleased that the Committee members had decided that it was in the best interests of the Borough as a whole for the Council to decide where its houses, jobs, roads and leisure facilities should be allocated. He urged the Committee members to continue with this task in order to ensure that the responsibility was not given to developers to decide which would not deliver the necessary infrastructure requirements such as roads, schools and hospitals.

Councillor Harris attended and, with the consent of the Chairman, addressed the Committee. He referred to the Council's transport policies and the importance of improving being made in the future. He spoke in favour of new developments including more than one access route in order to provide alternative means of travel for the future.

Councillor Moore attended and, with the consent of the Chairman, addressed the Committee. She referred to the traffic problems on Mersea Island and made reference to recent episodes of gridlock over the Bank Holiday weekend. She considered that the Island was becoming over-capacity so far as tourism was concerned, prompting her to seek a revision to the current caravan park policy which had been approved on the basis of a presumption towards extensions to caravan parks. She was of the view that this needed to be reconsidered with a view to further extensions being an exception, rather than the rule. She was aware of the presumption in the National Planning Policy Framework for development to be permitted but considered this was applicable in relation to housing and businesses but not tourism.

The Chairman acknowledged Councillor Moore's concerns and supported her request in terms of asking the Place Strategy Manager to report back to the Committee with further details on the caravan park policy.

Councillor Buston attended and, with the consent of the Chairman, addressed the Committee. He referred to the minutes of the meeting held on 12 June 2017 and the inclusion of his comments at the meeting regarding the need for a Southern Relief Road as well as a comment attributed to the Place Strategy Manager that a Southern Relief Road was being planned. Whilst he welcomed this development he was not aware that this project had yet progressed to a planning stage and sought further clarification as to why the Local Plan itself was silent on the matter. He, nevertheless, remained of the view that it would be a mistake for a Southern Relief Road not to be provided in the future plans for the town and that the existing Plan would be unsustainable without the vision to look into the opportunity.

Karen Syrett, Place Strategy Manager, referred back to her own notes of the meeting in June 2017 and explained that she had no record of commenting that a Southern Relief Road for Colchester was being planned and she suggested that, later in the meeting when they confirmed the minutes of the meeting on 12 June 2017, the Committee members could consider deleting this reference to ensure their accuracy.

Councillor Chillingworth attended and, with the consent of the Chairman, addressed the Committee. He indicated that he was representing the views of the residents of Rural North ward about the new garden community in West Tey and in particular the question of when the new transport infrastructure would be in place. He referred to the transport paper summary of the position after the realignment of the A120 and the widening of the A12. He regretted that the transport report had not been prepared for consideration

before the end of the consultation period, given the current number of approximately 20,000 vehicles a day in Marks Tey. He considered that the proposals for the West Tey Garden Community lacked a sound economic base and, as such, was of the view that the East Colchester proposals should be concentrated on first prior to the inclusion of West Tey. He further referred to the Middlewick Ranges allocation in the draft Local Plan as well as Colchester's long standing track record of successfully delivering its housing targets and speculated whether it would be possible to deliver the Council's long term housing supply without the need to include proposals for West Tey and, if this were possible, whether an Inspector would go so far as to consider the draft Local Plan to be unsound as a result.

The Chairman was of the view that people wanted to move to Colchester and it was difficult to restrict a market force outcome. He was aware that for the Mersea Homes' Chesterwell development, 71% of houses had been sold to people already living in Colchester and 80% of houses had been sold to people under the age of 50.

The Place Strategy Manager confirmed that, over the last 40 years the Council had delivered on its housing targets but the benefit of this was not that the Council could opt to not deliver on target but that it wasn't being required to provide for the under supply in previous years.

Councillor T. Young, in his capacity as Portfolio Holder for Business and Culture (and Deputy Leader of the Council), attended and, with the consent of the Chairman, addressed the Committee. He explained that the Middlewick Ranges site would not have included in the draft Local Plan if the Ministry of Defence had not decided to sell the site. He was concerned at suggestions that the Ranges site could accommodate a large number of housing units, given the need for detailed investigations of the site to be concluded before any accurate estimates could be formulated. He considered the planning officers had been highly professional and competent in the advice they had consistently provided to the Local Plan Committee. He welcomed the paper on employment, agreeing that the anticipated upward trend in homeworking was a valid one, whilst acknowledging there would continue to be a proportion of workers commuting for employment. He considered the report to be very comprehensive in terms of the number of issues considered as well as identifying where jobs were likely to be located and how much land would be allocated. He considered the number of knowledge based jobs to be an exciting prospect. He was saddened to hear concerns about increased tourism to parts of the Borough as he was pleased to hear about visitors to the borough and the associated financial boost to the local economy. He supported the information given by the Chairman about the joint approach to the consultation undertaken by Colchester, Braintree and Tendring and confirmed he had also been advised that the processes adopted were the same and was aware that it would be for the Planning Inspector to determine whether emailed submissions would be included in the consideration of the draft Local Plan. In terms of the transport paper, he considered that the need for a modal shift in transport choices was already a reality due to recent

Government announcements. He accepted the need for reduced use of cars but was of the view that tangible alternatives were required such as improved bus services and rapid transport routes. He confirmed that Colchester had received a far greater number of responses to the consultation than Braintree and Tendring and considered that the Council as a whole and the Local Plan Committee members had an important responsibility to get the decision making right. He was aware that places like Chelmsford had under provided in relation to its housing targets in previous years whilst Colchester had a track record of meeting its targets which meant that Colchester would be in a position to shape the housing developments for the future.

Ian Vipond, Strategic Director Policy and Place, confirmed that an announcement on revised national housing targets was expected in the Autumn. It was anticipated that the increase would be to 250,000 houses which would have to be delivered at the local level which therefore meant that numbers locally would be expected to increase accordingly. The Middlewick Ranges site had a large allocation and the site had been late in coming forward. He acknowledged the benefits of involving residents in the future planning of the site and suggested that arrangements be made for a planning brief to be prepared to enable this approach to be formalised.

RESOLVED that the Place Strategy Manager be requested to give consideration to a revision to the caravan park policy and to arrange for the preparation of a planning brief for the Middlewick Ranges site, both issues to be subject of further reports to the Committee in due course.

#### **114 Minutes of 12 June 2017**

John Crookenden addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3) in opposition to that part of the Plan relating to the Tendring / Colchester Borders Garden Community. He considered the previous meeting of the Committee had been well chaired and it had left people with the impression that the decision to approve the draft Local Plan for submission to the planning inspectorate subject to any revisions considered necessary in the light of the Committee's consideration of the reports on employment and transport at this meeting. He was now aware that this was not the case and further revisions to the Plan would not be possible. His colleague Rosie Pearson had chosen not to attend this meeting as she was of the view that the meeting would now be pointless. He considered the reports did not address any of the legitimate concerns expressed by speakers at previous meetings, instead they were merely a regurgitation of the evidence base already presented. He remained of the view that there were serious questions within the draft Local Plan which had not been answered and, as such, it would be wrong for the Plan to be submitted in its current form. He was of the view that the Objectively Assessed Housing Need total had been erroneously inflated and the £1.8b investment in the garden community projects was subject to serious risk. He was concerned about the adequacy of infrastructure plans, particularly in relation to primary medical care given there had been no

information from the health providers on plans for improvements or expansion in the future. He was of the view that the Plan was unsound and unsustainable and the proposals for West Tey should be removed.

The Chairman explained that the Committee was following the process laid down in guidance in relation to the content and consideration of the draft Local Plan. As such it was not open to the Committee to remove individual sites from the Plan at this stage. He referred to concerns expressed recently by the Chief Executive of the merging Ipswich and Colchester Hospitals and was aware of various submissions made by healthcare providers as part of the consultation exercise. These submissions referred in part to the changing way health services were likely to be delivered in the future. He confirmed that it would be for the Planning Inspectorate to determine whether the draft Local Plan was sound or not. There were examples of Local Authorities having their Local Plans thrown out at the Inspection stage, indeed this had been the case on three occasions in relation to Maldon District Council. He also had experience of representing a ward within the borough which had been subject to considerable new development over recent years. He was aware that senior officers of the council had met with representatives from CAUSE but, if there remained any matters which had been overlooked previously in this meeting or in previous correspondence, he offered to assist Mr Crookendon in obtaining a full response.

RESOLVED that the minutes of the meeting held on 12 June 2017 be confirmed as a correct record, subject to the deletion of the words: 'She confirmed that a Southern Relief Road was being planned' in minute no 112, page 11.

## **115 Local Plan Employment Position Paper**

Nick Chilvers addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He was concerned about the anticipated location of jobs for people who would be living in the new developments planned for Middlewick Ranges and Mersea Island and he was concerned that the number and density of houses identified for these sites in the Plan were likely to increase. He explained that the better paid jobs in the town tended to be located to the north of the town centre, away from these particular locations. He understood that a number of London based Housing Associations were buying housing stock in Colchester in order to house tenants, he was concerned about the lack of employment opportunities, particularly those which were local and better paid and was fearful of higher rates of unemployment, social problems and potential increased crime.

The Chairman confirmed that the formulation of a planning brief for Middlewick Ranges would assist in establishing the requirements to be delivered from the site. This would also define the numbers and densities which would deliver the best outcome for the site. He understood enquiries had been made of Housing Associations in London and refuted the assertion that housing in Colchester was being acquired to house tenants from

London.

William Sunnocks addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He referred to the garden community proposals and stated that it was vital for sufficient job opportunities to be developed. He understood there was a stated target of one job per dwelling. He didn't consider there to be a sound foundation to the report as it was based on aspirational scenario 3. His view was that the conclusion within that scenario was over ambitious and highly unlikely and he felt very strongly that the report needed to be based on scenario 2. He considered that the infrastructure proposals were out of balance and asked the Committee members to consider commissioning a review of the proposals.

Karen Syrett, Place Strategy Manager, responded to the points made. She explained that the information in the report had been available before the last meeting of the Committee, some having been presented to the Committee previously, and the information had already been taken into account when formulating the contents of the draft Local Plan. She further explained that the purpose of the report was to consolidate the various pieces of evidence already published. The condensing of the evidence was intended to allow the Committee members to look into the information in more detail.

The Committee considered a report by the Assistant Director Policy and Corporate giving details of the key issues for employment land delivery associated with the Local Plan, as requested by members of the Committee at the last meeting. Reference was also made to the Addendum Sheet which gave details of amended wording to paragraph 4.18 of the report.

Laura Chase, Planning Policy Manager, presented the report and, together with Ian Vipond, Strategic Director, Paul Wilkinson, Transportation Manager and Jim Leask, Enterprise Officer, responded to members questions. It was explained that the overall process of developing Local Plan employment policy and allocations was guided by the methodology laid out by the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The Local Plan would need to demonstrate, through the examination process, that the authority has 'set out a clear economic vision and strategy for their area' which was accompanied by criteria or strategic sites 'for local and inward investment to match the strategy and to meet anticipated needs over the plan period'.

Employment data was available from a range of sources and had been used to develop evidence base material to ensure that identified needs for employment floor space were matched with deliverable allocations. Specific study work consistent with Government requirements on methodology had been undertaken to inform the Local Plan and the Garden Communities including reports on:

- Employment Land Needs Assessment (ELNA) (NLP)
- North Essex Garden Communities Employment and Demographic Study (SQW and Cambridge Econometrics)

- Employment Land and Floorspace aligned with the November 2016 Objectively Assessed Need Report (Peter Brett Associates)
- Employment Land Trajectory and Report (Lichfields, formerly NLP)

The former Regional Spatial Strategy set a target of 14,200 employee jobs for Colchester between 2001-2021 which was considered to be the appropriate level to align with the Borough's housing target. The full Employment Paper, which was contained in an appendix to the report, illustrated that the Council was on track to meet this target whilst also identifying the increasingly important role played by self-employment which accounted for around 13% of all people in employment. The majority of forecast job growth would not be within the B Use Class activities of office, industrial and warehouse accommodation but in other Use Classes. Industrial jobs in particular were showing a decrease, while office and non-B use jobs were providing the source of employment growth.

The calculation of how much land would be needed to meet employment growth was developed through the use of forecasts and models which translated population and employment figures into floor space requirements. The Council's consultants, Peter Brett, had advised that the EEFM figure of 928 jobs a year was the most appropriate modelling figure to use. Recent work on the employment trajectory had identified that the Council would need to identify further employment land over the plan period of between 22 and 55.8 ha to allow for market choice, churn and expansion.

The Employment Land Trajectory prepared by Lichfields involved the detailed consideration of the sites that might meet the identified demand for future employment land and provides the information on suitability and deliverability to back up the allocation of 44.2 hectares of employment land shown in the Local Plan. A total of 25 sites were considered initially of which 15 sites were examined in detail and each was allocated to a five-year period: short-term, 2017-22; medium-term, 2022-27; and long-term, 2027-2033.

The emerging proposals for the two Garden Communities were examined in a report commissioned to assess the deliverability of employment aspirations as stated in the Garden Community objectives listed in Policy SP7 of the Local Plan - 'Provide and promote opportunities for employment within each new community and within sustainable commuting distance of it.' The report had concluded that the job growth aspirations were realistic assuming continuing political commitment and proactive delivery on the part of local authorities to ensure that the new communities followed through on their innovative and comprehensive approach to sustainable growth. The Colchester Braintree Borders Garden Community was anticipated to generate 1.17 jobs and Tendring/Colchester Borders Garden Community 1.55 jobs per dwelling. 18.75% of jobs were anticipated to be homeworking, 15% would be 'local service' and the remainder principally office based. For the plan period to 2033, an additional 4.5 hectares of employment floor space providing 18,134 m<sup>2</sup> of office space for the Borough

employment land was allocated in the two garden communities. Both garden communities were anticipated to appeal to younger working age adults and young families for whom the incidence of home working was considered to be relatively high, continuing national and local trends. In addition, Colchester was anticipated to attract more, higher order, professional and service functions and to develop further as a hub for leisure and tourism and as a retail destination, providing jobs both centrally and within the communities themselves for its residents, including increasing health care and other public service opportunities. Colchester/Braintree Borders connections with the A12, A120, the Great Eastern Main Line and the Gainsborough Line along with benefits from the expansion of Stansted Airport were likely to attract professional and service jobs, back offices, and linkage to the logistics supply chain. Whilst Tendring/Colchester Borders location close to the University of Essex and to central Colchester was expected to benefit from and be a major contributor to the growth of both, especially knowledge-based B1 jobs and those that supported them.

The Strategic Economic Areas (SEAs) were the best employment sites in the Borough and were proposed to be retained to meet anticipated needs over the plan period although recent evidence suggested the boundaries of each SEA needed to be reassessed. The Northern Gateway and Severalls SEA responded to the potential to maximise its prime location adjacent to Junctions 28 and 29 of the A12, for the retention and expansion of the Business Park and for opportunities to deliver an enhanced sports and leisure hub. The Knowledge Gateway and University SEA reflected opportunities associated with the growth plans for the University of Essex and the benefits linked to the new garden community to the east of Colchester within which additional land to expand the Knowledge Gateway was expected to be allocated. The third SEA at Stanway continued to be a favoured location for strategic economic opportunities taking advantage of good access to the A12 and A120. The Stanway SEA had been reviewed and reflected planning approvals and the decreasing demand for traditional employment land. The recently allowed planning appeal for significant retail development on the Tollgate site would, if implemented, reduce this SEA by 11.75 hectares.

The draft Local Plan sought to take account of some non-B uses and their floor space requirement through special policies focussing on the class economic uses provided within centres as well as North Station and Hythe special policy areas and the Colchester Zoo. Other sectors which would be important were health and social care, as well as construction.

Colchester's employment policies and allocations set a strategic long-term direction for investment to deliver B use jobs with a range of interventions planned by the Council and partners to drive delivery of these sites, to add value to them and their occupiers and potentially increase the overall employment level of the Borough and its prosperity beyond what the market would otherwise be likely to provide. The Council would play an important role in adopting a proactive approach to securing inward investment and support for the expansion of local businesses through enhancing digital connectivity and

the opening of the Creative Business Centre on Queen Street. In addition funding bids were being developed and submitted and there had been significant success with infrastructure funding from the South East Local Economic Partnership Local Growth Fund and from the Department for Business, Energy and Industrial Strategy. Further bids were being made to Highways England, the Department for Communities and Local Government and the Department for Culture, Media and Sport.

The Committee members gave full and detailed consideration to the report and the comments made by the speakers. In particular, the following comments were made:  
Councillor Barber:

- He was disappointed that the Committee was not able to make amendments to the draft Local Plan but acknowledged that the Planning Inspectorate would make the final determination of the Plan;
- He agreed that homeworking levels were increasing but was sceptical of the anticipated increased proportion of homeworking;
- He was particularly concerned about the development of the garden communities as well as the importance of the timely delivery of a rapid transport system and sought assurances about the timescales in relation to that.

Councillor Jowers:

- Continued to maintain that the West Tey proposals were premature, given the lack of confirmation about the realignment of the A120 and widening of the A12;
- He considered the proportion of people travelling to London from a development at West Tey would be much higher than officers suggested;
- The impact of a garden community development at West Tey would be felt across the whole southern arc of Colchester, particularly given the lack of transport mediation;
- He was of the view that positive outcomes from the Middlewick Ranges development needed to be carefully planned with local residents being involved in the outcome;
- He was concerned about recent incidences of congestion around Mersea and the Peldon road junction and sought a reduction in the numbers of residential units envisaged for Mersea Island;
- He made reference to the loss of brown field sites which had been used for housing development in the past;
- He was not opposed to the submission of the draft Local Plan in its current form as it would be for the Planning Inspectorate to determine and he did not want the Council to become vulnerable to ad hoc development.

Councillor Chapman:

- He was concerned about the decline of manufacturing industry and the associated fall in wealth creation in the borough;
- He acknowledged the increase in numbers of people who wanted to spend their leisure time visiting tourism destinations and agreed that this was having an impact on areas like Mersea and Dedham;
- He was encouraged that the minutes from the Committee meetings would form part of the evidence base presented to the Planning Inspectorate;

Councillor Ellis:

- He acknowledged the impact of caravan parks and the extension to their periods of occupation for those living around the Mersea Island area;
- He strongly disputed the statement anticipating only 7% of residents from the West Tey garden community travelling to London for work as he considered this was clearly unrealistic;
- He acknowledged the potential for employment growth and better paid employment associated with the East Colchester garden community in the light of its proximity to the Knowledge Gateway, however, he questioned what mechanisms would drive the creation of new job opportunities for the West Tey garden communities;
- He sought clarification on the ability of residents employed in lower paid jobs being in a position to buy houses within the garden community developments which were being built with high design criteria and at a 10% premium;
- He disputed the proportion of people anticipated to be working from home;
- He sought clarification in relation to the timeframe for the delivery of the rapid transport solution.

Councillor Barlow:

- He referred to underlying assumptions in the report and sought clarification in relation to the accommodation of smart cities and the linkage of infrastructure with the cultural and creative industries;
- He also asked about the reasons behind the projected fall in numbers of workers within the education sector.

Councillor Scott-Boutell:

- She referred to the conversion of unused retail units into residential properties as well as the growth in existing businesses looking for improved office space and the need for these trends to be factored into the Local Plan process.

Councillor Warnes:

- He welcomed the paper and acknowledged the complexities of accurate forecasting;
- He agreed with the need to demonstrate more confidence in the ability of Colchester to create jobs and to use the positive interventions to increase job opportunities.

The Chairman was of the view that the inclusion of a site within the draft Local plan document did not necessarily mean that the development would be certain to be implemented. However he was concerned at the potential ability of developers to appeal refusal of planning applications arguing that the Council did not have an adequate five year supply of housing land.

The Transportation Policy Manager gave details of information from recent census data about projected external trips from the garden communities, explaining that 60% were expected to work in Colchester, whilst only 7% would travel to London, with greater proportions travelling to Braintree and Tendring. He also confirmed that the mass rapid transport system was likely to come forward earlier than the indications in the report

which would therefore reduce the number of journeys from the garden community's developments.

The Enterprise Officer explained that the proportion of people homeworking had increased significantly since 2011 and the introduction of 5G technology was likely to have a further impact on these levels, together with the ability of employers to reduce overhead costs by introducing more flexible working arrangements. He explained the use of recognised external companies who provided modelling data to help local authorities align jobs and housing delivery targets. He attributed the fall in workers within the education sector to the increased use of technology. He acknowledged predictions were difficult over a 15 year timeframe and that modelling tended to work best across a national economy rather than at a more local level. He acknowledged the movement of employers from London to places like Chelmsford and confirmed that work was ongoing to identify employers who may be interested in moving further north to Colchester.

The Strategic Director considered that areas of new housing developments were likely to be at the forefront of innovation and so the incidence of improved technology, new jobs and homeworking was likely to be greater in these locations. He further considered that Colchester had a track record of successfully delivering new jobs, whilst the garden communities' delivery agency would be seeking to concentrate its goals on achieving high levels of employment. He confirmed that further information was likely to continue to be added to the employment evidence base and he anticipated that more detail would be available in the Autumn in relation to the garden communities' evidence base. He acknowledged the difficulty of predicting where future employment growth would come from but made an analogy to the growth of the Paxman company which had been at the forefront of diesel engine design. He referred to Colchester's success in generating good jobs over a number of decades and over a variety of sectors. He considered it was likely that growth would come from health and creative industries, aided by direct intervention mechanisms inherent in the garden community concept. There were also changes anticipated in relation to new technology and the delivery body for the garden communities would generate new jobs, particularly in an area already well known for its job creation successes. He further acknowledged the inevitability of residents continuing to commute to London for work but also referred to a more recent trend in employers relocating out of London to take advantage of the extra road and rail capacity for commuters travelling in the opposite direction. He further acknowledged the acceptability of losing some of the older employment building stock on the grounds that it would be preferable to seek renewal of this sector to provide for expansion and growth. It was far more unfortunate in instances where usable employment premises were being vacated in order to accommodate conversions to residential use.

RESOLVED that the contents of the report be noted.

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

Victoria Weaver addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). She explained her reservations about the West Tey proposals due to concerns about road congestion on routes around Colchester North rail station and the need for improvements as soon as possible. She was of the view that the use of buses was undervalued as there was potential for increased bus travel to take traffic away from the roads. She considered the use of buses needed to be incentivised to a greater extent as well as the increased use of less frequented rails stations locally.

The Chairman confirmed that Colchester North station had an important impact on his ward. He has collected over 8,000 signatures to a petition about congestion which was submitted to Essex County Council. He was aware that work was ongoing and explained that developers could only be required to provide for mitigation in relation to issues which were directly attributable to each development proposal. He considered the cost of bus travel to be the greatest reason for complaint as it continued to be cheaper to drive into the town centre and park than to use a bus as an alternative. He was aware of subsidised bus routes but these were diminishing and needed to be reconsidered as valid alternatives in the future.

David Broise addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He had been a resident of Mersea for a number of years so was aware of the issues affecting the Island. He was aware of the national Government's policies which had associated impacts on local authorities. He also experienced the episodes of considerable congestion on Mersea Island, particularly over Bank Holiday weekends and the fact that some visitors considered £30 fines to be acceptable in order to park their vehicles conveniently for the day. The proposals for further development on the Island would only make this situation worse.

Nick Chilvers addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He referred to the roads in Colchester which were known to have poor levels of recorded emissions. He was of the view that the locations and corresponding emission levels needed to be openly published so that residents and road users were better informed. He was concerned about the 'wedge' between Mersea Road and the Hythe and considered this needed to be addressed. The report in the Committee's agenda implied that there was not a significant transport problem in Colchester but he considered this to be misleading.

Councillor Cory attended and, with the consent of the Chairman, addressed the Committee. He was concerned that the report contained no reference to air pollution in the town. He was of the view that intelligent ways of dealing with congestion and cleaner forms of transport needed to be considered. He advocated the consideration of options

and visionary designs for the rapid transport system which needed to be implemented in conjunction with the first residential developments. His main concern was transport which needed to include a rapid transport solution which was green, sustainable and innovative, in return for which the Council would need to demonstrate its willingness to work with Essex County Council and the Government to find the right solution. He would also support a spur to Mersea if required. He referred to the impact on Wivenhoe and the difficult daily traffic situation at the Clingoe Hill junction. He advocated solutions including both buses and cycles. He explained Wivenhoe residents' requirement for separation from the proposed East Colchester garden community and asked that a green buffer be identified to protect Wivenhoe from the new community. He also referred to his awareness of work being planned by Essex County Council to alleviate some of these issues.

The Committee considered a report by the Assistant Director Policy and Corporate giving details of the key issues for transportation and growth associated with the Local Plan, requested by members of the Committee at the last meeting.

Paul Wilkinson, Transportation Policy Manager, presented the report and, together with Alan Lindsay, Essex County Council's Transport Strategy and Engagement Manager and Martin Mason, Essex County Council's Strategic Development Engineer responded to members questions. It was explained that planning and transportation were closely linked and referenced in the National Planning Policy Framework (NPPF) with the requirement to develop transport evidence to support the Local Plan as set out in national Planning Policy Guidance (PPG) whilst the responsibility for delivery of transport infrastructure and services lay with a number of public and private sector bodies. Transportation data was available from a range of sources and has been used to develop evidence base material. Specific study work has been undertaken to inform the emerging Local Plan and the proposed Garden Communities and design work was being undertaken by various bodies to develop solutions for improving the strategic transport infrastructure.

There is a high level of vehicle movements in Colchester in the peak hours, resulting in congestion at certain times of the day in certain locations. The operation of the network had an impact on the economic growth of the Borough through increased journey times and unreliable and unpredictable delivery times for goods and services. In addition the high level of traffic, mix of vehicles and the nature of some of the streets in the urban area resulted in poor air quality. Traffic modelling suggested a 40% growth by 2032 in the number of vehicle trips in peak periods compared to 2007. The modelling also suggested an increase in queuing and travel time, a small decrease in the average speed and 200 locations in each of the peaks, where the demand was indicated to be greater than the capacity.

A range of measures and potential solutions had been suggested from the modelling which included physical and management improvements to the road network as well as

investment in sustainable transport, details of which were set out in the appendix to the report. Transport policies in the emerging Local Plan also promoted a range of measures to support growth including combinations of traffic management, infrastructure and sustainable transport measures, with improvements planned to:

- The local walking and cycle network
- Local public transport services
- The local road network
- Strategic road and rail network and services
- Parking policy including the provision of electric vehicle charging.

The Garden Community approach provided an opportunity to plan around a step change in integrated and sustainable transport systems for the North Essex area that put walking, cycling and rapid public transit networks and connections at the heart of growth, encouraging and incentivising more sustainable active travel patterns. A number of the key strategic projects were already at the feasibility and design stages including:

- A12 Widening junction 19 to 25
- A120 improvements, Braintree to A12
- Great Eastern Mainline upgrade
- Investment in a new train fleet by Greater Anglia
- Rapid transit.

The Council was continuing partnership work with Essex County Council and other transport infrastructure and service providers to develop and deliver solutions with, for example, a requirement for developers to produce Transport Statements and/or Assessments and potentially to deliver directly or make financial contribution to mitigate against the impact of their development. To enable funding to be sought from other bodies, investment was required in feasibility and design to develop business cases and make submissions for funding. The major funding sources included Central Government through investment in the strategic road and rail network, South East Local Enterprise Partnership Growth Funds, the Housing Infrastructure Fund, the Garden Communities land value capture schemes, and various grant opportunities as they arose.

The Chairman was concerned that the proposed new trains for the Greater Anglia route would not increase capacity as the carriages would not provide for additional seating. He also made reference to the limited success of the park and ride facility in Colchester. He made a plea, in relation to Section 106 mitigation, for Essex County Council to consider alternative solution other than cycle paths.

The Transportation Policy Manager explained that Greater Anglia were providing for a whole fleet replacement with the biggest increase in capacity being for the Norwich rolling stock which would remove the locomotive and guards' vans. He was aware that Greater Anglia had quoted a 55% increase across the whole of the region which equated to 32,000 extra seats during the morning peak. In addition, there would be provision for extra track at Witham to move freight from the mainline.

The Committee members gave full and detailed consideration to the report. In particular, the following comments were made:

Councillor Jowers:

- He asked when announcements would be made in relation to the A120 and A12, commenting that currently access from the southern side of the A12 was particularly poor and future improvements would make the southern located villages more desirable;
- He referred to the entry and exit route to Mersea Island which included the blind bend at Dawes Lane, meeting with traffic from the various caravan parks at East Mersea;
- He was encouraged by the discussions relating to the Southern Relief Road but was concerned that the processes associated with the North Essex Parking Partnership and the Local Highways Panel were slowing down processes;
- He questioned whether it was necessary to seek up to 200 residential units on Mersea Island if the site at Middlewick and the garden communities proposals were proceeding.

Councillor Barlow:

- He was satisfied with the report but considered it to be contributing to the problem of increased traffic as it did not adequately address the issue of alternative forms of transport.

Councillor Barber:

- He indicated his preference for the report to include more detail on individual roads and generally for greater consideration to road infrastructure prior to residential development taking place.

Councillor Ellis:

- He questioned the status of the garden community proposals at West Tey and whether the submitted draft Local Plan would indicate that these proposals were contingent upon the outcome of the A120 consultation;
- He was of the view that funding from developments in Stanway needed to be directed to improvements on the A12;
- He questioned the use of Section 106 funds for cycle paths and asked for statistics on the number of cyclists using the paths and projections on the number of car journeys prevented as a result.

Councillor Chapman:

- He was of the view that a number of issues were affected by people's unwillingness to consider alternatives to cars for short journeys;
- He also referred to travel between Essex and Suffolk which was badly affected by the narrow and badly designed road network and questioned whether any proposals were impending in this connection.

Councillor Scott-Boutell:

- She was concerned about the number of vehicle movements per day associated with the schools on Winstree Road which were not possible to manage by means of transport plans alone as these did not include effective means of enforcement;

- She considered it would not be feasible to plan for all children walking to school as so many were dropped off from cars on their parents' journey to work.

Councillor Fox:

- He welcomed the implementation of a travel consultation for Colchester along the lines of one recently utilised in Chelmsford;
- He was of the view that efforts needed to be made to encourage schools to participate in plans for the garden communities in order to ensure commitment to alternative transport measures;
- He speculated which body was ultimately responsible for delivering transport modal shift.

Councillor Warnes:

- He considered it important to understand the challenges faced by people with mobility impairment, particularly in relation to maintenance of bus routes;
- He was also interested in the detail of the bus strategy currently being formulated by Essex County Council.

The Transport Strategy and Engagement Manager explained that the A12 improvements had commitment and funding. It involved issues which needed improvement such as limited access junctions at Hatfield Peverel and Maldon and he anticipated an announcement on the preferred route would be made during September or October 2017. The realignment of the A120 was not an Essex County Council project although the County Council had been leading on the feasibility Study rather than Highways England. He anticipated that a position statement on Essex County Council's preferred option would be published in October or November 2017 but the final decision would be a matter for Highways England to determine. He hoped it would be included in RIS2 which would be announced in September or October 2018 and which would provide a start on site timescale of 2023 with completion in 2026. He considered the cost of the scheme may have a considerable impact as the funds available for RIS2 were unknown, but Essex County Council was working to maximise the benefits of the scheme wherever it could. He was of the view that Essex County Council had a good track record in balanced proposals, utilising alternative forms of transport and he considered Colchester Council was similar in this regard. He also confirmed that nothing significant had yet happened in relation to a Colchester Southern Relief Road., he acknowledged that there were many definitions of infrastructure and cited, as an example of Essex County Council's commitment and level of intent to real improvements in Colchester, the forward funding of the Northern Approach Road 3. In terms of car journeys for short journeys, he referred to issues associated with school transport and the reluctance of people to walk or use cycles for these journeys. In terms of the benefits of cycle routes, he offered to circulate relevant statistical information to the Committee members after the meeting, as he did not have it to hand. He also offered to circulate to members of the Committee details of the Bus Strategy together with details of a transportation blue print for the Colchester area

The Transportation Policy Manager was of the view that the garden communities needed

to be designed for walking and cycling so that people feel comfortable with these methods of transport. In terms of modal shift, the Council had willing partnerships which were working well but problems existed in relation to identifying champions and funding streams. He considered more success would be forthcoming if more businesses were prepared to make a change.

RESOLVED that the contents of the report together with the appendix be noted and the invaluable contributions made to the discussion by Alan Lindsay and Martin Mason be welcomed.

## **117 Local Plan Consultation**

John Akker addressed the Committee pursuant to the provisions of Meetings General Procedure Rule 5(3). He wished to put on record his thanks to the planning officers for assisting with the Stop 350 group submission to the Local Plan consultation. He considered much more attention needed to be given to public engagement with the people of Colchester which could have been undertaken far more imaginatively. He felt the public had been left behind in all the discussions. In terms of Mersea Island, 1,200 residents were involved but many were willing to forego their right to make representations in order to facilitate a joint submission by all. He also sought assurances regarding conversations with the Chief Executive of the Ipswich and Colchester Hospitals. He considered that people were concerned that the hospital would not be able to deal with the additional number of residents planned for the Borough.

The Committee considered a report by the Assistant Director Policy and Corporate giving details of the approach taken to the consultation on the Publication draft of the Local Plan which had been the subject of criticism at the Committee's previous meeting.

Karen Syrett, Place Strategy Manager, presented the report and responded to members questions. She also referred to the Addendum Sheet which set out an amendment to paragraph 4.12 of the report. It was explained that the preparation of Local Plans was governed by legislation, whilst the detailed procedural aspects of the examination were not prescribed. However, the Planning Inspectorate had published guidance and practice notes which provided the main operational framework for the examination of plans which had been used to ensure the publication and submission of planning documents followed the correct procedures.

Much of the criticism related to difficulties in using the website and the format of the response form, in response to which the following actions were taken:

- Two training sessions for parish councils;
- Guidance notes;
- A word version and PDF of the form available on the website and in hard copy;
- A 'banner' on the home page of the website directing to the right page and further updated to improve prominence;

- A 'help' link on the home page of the consultation portal itself;
- Guidance notes taken to the consultation events;
- Email, telephone contact details and individual help provided.

The purpose of the examination by the Planning Inspector was to consider whether the plan complied with the legal requirements, the duty to co-operate and was sound. The Council used an identical representation form to Braintree and Tendring which was made available on request or from the website and was accepted for return by post or email, all of which followed the Planning Inspectorate model form and guidance notes. Only those representations made within the defined consultation period would be taken into account by the Inspector as part of the examination and the guidance made it clear that when making a representation seeking a change to the published plan, it should be as specific as possible about the issue and the changes needed to make the document legally compliant or sound. Experience from previous consultations had shown that representations which did not include details as to why the document was unsound or did not specify what policy or paragraph the comments related to were not included in the Inspectors evaluation. For this reason people were advised to state if they thought the plan complied with these requirements and if not what change was required.

It was estimated approximately 1,000 representations had been received, the vast majority of which were submitted electronically/using the specified form. However, this figure would change as work progressed transcribing representations submitted in other forms. No representations had been rejected and all would be passed to the Inspectorate. It was understood that Tendring had received approximately 200 representations to its Plan and Braintree had received between 400 and 500

The Place Strategy Manager also explained that she and her team were keen to listen to suggestions for better forms of engagement. She referred to a forthcoming meeting with the health service providers and offered to circulate to members of the Committee, a brief summary of the meeting. She explained that the team continued to work through the 1,200 representations received in response to the consultation. Many were still being logged individually as use of the online portal had accounted for only 60% of responses. The portal responses were easy to validate and therefore more efficient to process and she welcomed the combined approach adopted by Mr Akker on behalf of the Stop 350 group. She confirmed that although online consultation responses or the individual use of the pro-forma had been encouraged, no individual emailed response had been rejected, despite the fact that these had taken far longer to process, some having been submitted without names or addresses. Given the short space of time since the deadline for submissions, it had not been possible to provide the Committee members with a summary of the consultation responses, although this would be provided at the Committee's next meeting. All submissions made by means of the online portal were available to view from the Council's website and, as individual emailed submissions were processed, these would also become available for viewing.

RESOLVED that the contents of the report be noted.



## Local Plan Committee

Item  
**7**

2 October 2017

<b>Report of</b>	<b>Assistant Director Policy and Corporate</b>	<b>Author</b>	<b>Laura Chase</b> ☎ 282473
<b>Title</b>	<b>Draft Publication Local Plan Consultation Responses</b>		
<b>Wards affected</b>	<b>All wards</b>		

**The Local Plan Committee is asked to note the responses received following the consultation on the Publication Draft Local Plan.**

### 1. Decision(s) Required

1.1 The Committee is asked to note the content of the report.

### 2. Reasons for Decision(s)

2.1 To make members aware of the representations received on the Publication Draft Local Plan.

2.3 Section 1 and Section 2 of the Local Plan have been published for consultation pursuant to Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Local Plan is subject to a statutory six week public consultation period and the Sustainability Appraisals five weeks; however, the consultations were extended by two weeks following a decision by Committee members to allow more time for response during the summer period.

### 3. Alternative Options

3.1 There are no alternative options – the report is a summary of the representations received. It is helpful for Members to be aware of the issues arising from the statutory consultation process as it advances to submission and examination of a new Local Plan. The alternative of not proceeding with a new Local Plan would leave the Council in a vulnerable position going forward with no clear steer for the future growth and development of the Borough. It would result in existing policy becoming outdated and not in accordance with national policy requirements.

### 4. Supporting Information

4.1 This report concerns the consultation undertaken on the Publication Draft Local Plan and provides a high level summary of responses received. All representations received will be submitted to the Planning Inspectorate for

examination alongside the plan and supporting documents and will be considered during the examination.

- 4.2 The preparation of Local Plans is governed by The Town and Country Planning (Local Planning) (England) Regulations 2012. There is also policy and guidance within the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG).
- 4.3 Work on the Council's new Local Plan began in 2014 and involved consultation on an initial Issues and Options consultation in January/February 2015. The Committee has received reports in June and August 2015 noting the results of the Issues and Options consultation and providing progress on the development of the plan and its supporting evidence base. During this period, the Council also invited landowners and developers to put forward potential sites for development which the Council has then assessed for suitability.
- 4.4 In July 2016 the committee considered the full Preferred Options Local Plan and agreed public consultation over an extended ten week period running from 9 July to 16 September 2016. As noted in the report on Preferred Options consultation considered by the 7<sup>th</sup> November 2016 committee, the consultation attracted 2995 representations from 1482 respondents. This compares to a total of 649 responses from individuals and organisations at the Issues and Options stage in 2015.
- 4.5 The Local Plan has now progressed to Publication Draft stage and this committee agreed at its June meeting to carry out public consultation for an eight week period between 16<sup>th</sup> June and the 11<sup>th</sup> August. A report detailing the consultation methodology was considered at the last meeting of the Committee on 30<sup>th</sup> August 2017.
- 4.6 The consultation process involved publishing the document and supporting information on the website; notification of the consultation to the Council's extensive list of interested organisations and individuals; and a series of public drop-in sessions which were advertised through social media, press coverage, and posters circulated to parish councils. The sessions held are detailed below;

<b>Venue</b>	<b>Date</b>
Stanway Village Hall	17 June 10-14:00
Colchester High St market stall	23 June 10-14:00
Greenstead Community Centre	24 June 10-14:00
Great Tey Village Hall	27 June 16-20:00
Marks Tey Village Hall	1 July 10 – 14.00
Abberton & Langenhoe Village Hall	3 July 16-20:00
Langham Community Centre	6 July 16-20:00
MICA Centre West Mersea	8 July 10-14:00
Abbotts Road Community Centre	12 July 16-20.00
William Loveless Hall Wivenhoe	11 July 16-20:00

- 4.7 At the drop-in sessions, attendees were provided with background information on the Local Plan process; access to copies of the consultation document; opportunities to ask questions of the officers in attendance; and information on how to respond formally to the consultation, including advice on using the consultation portal.
- 4.8 Officers estimate that approximately 600 people attended the drop-in events in total. In light of the cross-boundary policies and allocations in the first section of the Local Plan, a Colchester officer attended Braintree/Tendring Local Plan drop-in sessions at Coggeshall and Elmstead, while Braintree officers were represented at the Marks Tey event. An Essex County Council highways representative attended the events at Great Tey and Coggeshall.
- 4.9 At the time of writing, a total 1200 representations from 573 representors had been received. Approximately 60% of these were made using the on-line consultation system with the remainder received via e-mails and letters and then recorded on the consultation system. Further information on totals will be provided at the meeting. While the Council requested further information from respondents to clarify their views on the plan when not provided, no representations were rejected even if this further information was not submitted. All representations received within the 8-week consultation period accordingly will be forwarded to the Planning Inspectorate with the information provided. The Inspector will then need to decide how they deal with those representations which do not address all points, particularly in relation to soundness and legal compliance. The following representors submitted representations on behalf of the following number of individuals:

CAUSE – 1125

Stop350 West Mersea - 1163

Dawes Lane West Mersea - 77

Middlewick – live electronic petition – approximately 1100 at close of consultation period

Copford -221

Great Tey - 69

Fordham -26

Total – 3,781

The additional individuals represented through a joint representation bring the approximate overall total of people responding to the Local Plan consultation approximately 4300.

- 4.10 Part of Local Plan preparation includes preparation of a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) which assesses the environmental implications of every policy and site allocation in the Local Plan, together with all reasonable alternatives. Two separate SA/SEA documents were prepared for Section 1 and 2 and published at the same time as the draft Local Plan for consultation. A total of 7 (at the time of drafting) responses were received to the consultation on the Sustainability Appraisal documents, and these responses will be forwarded as part of the submission of the plan for examination.

- 4.11 Issues of concern raised in the representations have been summarised in Appendix 1. This high level summary provides an overview of points made for members' information prior to submission of the plan for examination. (NB supportive comments have not been summarised as the examination will focus on scrutinising policies and allocations considered to be 'unsound'). Members and the public can view all representations to the plan in full using the Local Plan software and following the links:  
Section 1 - <https://colchester.jdi-consult.net/localplan/readdoc.php?docid=6>  
Section 2 - <https://colchester.jdi-consult.net/localplan/readdoc.php?docid=7>  
The consultation system can be searched by policy numbers as well as representor names.
- 4.12 Surrounding local authorities including Braintree, Tendring and Chelmsford provided positive responses to the plan, noting joint work carried out in line with Duty to Cooperate requirements. A Duty to Cooperate meeting was held with Maldon following the close of consultation to discuss any issues which did not result in the identification of any significant issues. Essex County Council expressed broad support for the plan, noted their partnership working with CBC on numerous fronts, and suggested a number of minor changes to clarify wording to be considered through the Examination process. Basildon District Council has identified issues with South Essex authorities being able to meet their housing requirements in full due to Green Belt and environmental constraints and has requested that other Essex authorities, including those in the Colchester/Braintree/Chelmsford/Tendring Strategic Housing Market Area (SHMA), consider addressing this need in their targets. The Essex Planning Officers Association is developing a protocol to ensure that requests such as Basildon's for addressing requirements for dwellings to meet other SHMA needs are dealt with in a consistent and appropriate way.
- 4.13 **Next steps**  
A more detailed Statement of Consultation will be finalised as it is one of the supporting documents required to accompany the Plan when it is submitted for examination. The issues raised will be analysed by the Inspector appointed to examine the plan, with the public examination providing the opportunity for further exploration and debate on the 'soundness' of the plan. The Council will develop Memorandum of Understanding and/or Statements of Common Ground with stakeholders as required to clarify agreed approaches to the resolution of issues raised through the plan-making process.
- 4.14 It is intended to submit the plan to Government as soon as possible once all submission materials have been completed by all three authorities submitting their linked Local Plans. The Planning Inspectorate will then notify the Councils as to who has been appointed to examine the plan and will schedule in two examinations. The first will consider the strategic and cross-boundary policies and allocations covered by Section 1 and is expected to be scheduled for early next year, while the examination for Section 2 is expected to be scheduled in mid-2018. As noted in the report on Local Plan consultation considered at the 30 August Committee meeting, if any changes are made to the plan following the Regulation 19 consultation, these changes would be prepared as an addendum

to the plan. The addendum would be subject to further consultation and, if necessary, to sustainability appraisal before submission if it is to form part of the plan to be examined.

## **5. Proposals**

- 5.1 The Local Plan Committee is asked to note the summary of issues raised during the consultation on the Draft Publication Local Plan.

## **6. Strategic Plan References**

- 6.1 The 2015 to 2018 Strategic Plan set out to be Vibrant, Prosperous and Thriving. The Local Plan can help achieve all of these objectives.

## **7. Consultation**

- 7.1 Consultation on the Local Plan is guided by the Council's Statement of Community Involvement, which is available on the [Council's website](#). The recent consultation was undertaken in line with the Model Representation Form and Guidance for Plan Publication Stage Consultation published by the Planning Inspectorate, designed to assist the examination process. Braintree and Tendring also used the form.

## **8. Publicity Considerations**

- 8.1 The report may help to publicise the reasons the Council adopted the approach it did to the recent public consultation.

## **9. Financial Implications**

- 9.1 None specifically relating to this report

## **10. Equality, Diversity and Human Rights implications**

- 10.1 An Equality Impact Assessment has been prepared for the Local Development Framework and is available to view on the Colchester Borough Council website by following this pathway from the homepage: Council and Democracy > Policies, Strategies and Performance > Equality and Diversity > Equality Impact Assessments > Commercial Services > Local Plan.

## **11. Community Safety Implications**

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

## **12. Health and Safety Implications**

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

### **13. Risk Management Implications**

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

### **14. Disclaimer**

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

## Appendix 1 Representations on Section 1 Policies and Allocations – Key Issues

(Note this summary is of the key issues only to provide an overview in relation to Section 1 in the Publication Draft Local Plan.

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
<b>SECTION 1</b>		
Introduction and Vision	17	<ul style="list-style-type: none"> <li>• Deliverability and viability questioned</li> <li>• Infrastructure first</li> <li>• Collaboration with existing communities to ensure appropriate integration of new communities</li> <li>• Need to have secured economic success across the area to underpin growth – economic generator needed.</li> <li>• Natural England – need for a high level strategic objective on protecting and enhancing natural environment.</li> <li>• Historic England – need for reference to distinctive character of North Essex and protecting heritage assets/character of existing settlements.</li> <li>• Sport England – need strategic objective that specifically covers creating healthier and active communities.</li> </ul>
SP1: Presumption in Favour of Sustainable Development	18	<ul style="list-style-type: none"> <li>• Existing infrastructure deficit and impact not addressed. Insufficient capacity to support growth.</li> <li>• Adverse impacts do not outweigh perceived benefits.</li> <li>• Highways England – support reducing the need to travel by private car</li> <li>• New development should become measurably more sustainable</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• CPRE -Garden Communities might accord with theory of sustainable development principles, but scale, location and potential impact of those proposed in North Essex questioned.</li> <li>• Infrastructure needs to be delivered prior to development.</li> </ul>
SP2: Spatial Strategy for North Essex	29	<ul style="list-style-type: none"> <li>• Need for more overall leadership and responsibility when considering cumulative impact – must include investment in local businesses and infrastructure.</li> <li>• Insufficient proposals for infrastructure upgrades, lack of current infrastructure.</li> <li>• North East Essex Clinical Commissioning Group – Ensure location of appropriate healthcare facilities to support Garden Communities.</li> <li>• Colchester Hospital Trust- Housing estimates used in Infrastructure Delivery Plan queried which could underestimate need for housing and consequential impact on health services.</li> <li>• Provision to protect the existing character of the area needed.</li> <li>• Clarity on location of Garden Communities needed.</li> <li>• Highways England – current designs are based on previously envisaged growth rates rather than new proposals. Steep change in provision and take up of public transport needed.</li> <li>• CAUSE – proposals for two of the three Garden Communities should be dropped – not supported by Sustainability Appraisal.</li> <li>• CPRE – Council hasn't demonstrated it can implement balanced communities supported by infrastructure.</li> <li>• Proposals for Garden Communities rely on future plans which may or may not demonstrate deliverability/viability.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• Greater clarity needed on what Garden Communities are intended to achieve and whether aims could be delivered by more traditional development such as urban extensions.</li> <li>• Historic England – provide reference to settlements maintaining their distinctive and historic character.</li> </ul>
SP3: Meeting Housing Needs	20	<ul style="list-style-type: none"> <li>• North East Essex Clinical Commissioning Group – Important to ensure health facilities are positioned in suitable places to enable communities to access healthcare appropriately.</li> <li>• No justification for applying a market signals uplift to the demographic projections. If these removed, that the need for two out of three garden communities is removed.</li> <li>• Developer representations received supporting upward adjustments in housing numbers to reflect increased migration from London, concerns regarding affordability, inclusion of Maldon within the Strategic Housing Market Area, and Tendring population calculation uncertainties.</li> <li>• Lack of housing need evidence for proposed post-2033 growth.</li> <li>• Basildon District Council - Unmet need for housing may arise from the South Essex Housing Market area. Amount has not been quantified but South Essex authorities may ask authorities in other HMA's in Essex to help in meeting unmet need. Issue could be overcome by a modification that introduces a review mechanism.</li> <li>• Simultaneous delivery of two Garden Communities – viability of this questioned.</li> <li>• No evidence that 'step change' in sustainable transport is possible.</li> <li>• Include more sites in first five year period.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• Deliverability of numbers questioned, particularly since Garden Communities not able to contribute to delivery until end of plan period.</li> </ul>
SP4: Providing for Employment and Retail	15	<ul style="list-style-type: none"> <li>• Address implications of commuting to London and include reference to its role.</li> <li>• Delivery of high quality jobs questioned – plan doesn't provide explanation for how and where they'll be provided.</li> <li>• Lack of evidence to demonstrate Garden Communities can meet target of one job per household.</li> <li>• Plan over-centralises employment in large employment zones and fails to link housing to local jobs.</li> <li>• No evidence for why a 'higher growth scenario' should be considered – would result in identifying land for employment that will not come forward.</li> </ul>
SP5: Infrastructure and Connectivity	27	<ul style="list-style-type: none"> <li>• Infrastructure hasn't kept pace with growth and insufficient infrastructure is planned to accompany new growth.</li> <li>• Delivery of infrastructure questioned – more information and certainty needed on funding sources, timescales, and how new communities will attract scale of investment required.</li> <li>• Wording of the policy is unclear and should be amended to require the delivery of necessary strategic infrastructure in advance of or in parallel with the specified need.</li> <li>• Faster broadband required, in particular to assist with service delivery</li> <li>• Viability evidence supporting policy is flawed.</li> <li>• Highways England - Roads Investment Strategy (RIS1) published in 2014, which committed Highways England to commence widening of</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<p>the A12 between junctions 19 to 25 to three lanes, and to prepare options for consideration in RIS- 2 (2020-25) for widening between junctions 11 to 16 and 25 to 29. Essex County Council has been examining the feasibility of upgrading the A120 between Braintree and Marks Tey to a dual carriageway, with a view to submitting this for inclusion into a future RIS-2 funding round. Until housing and employment is committed the road schemes can really only deal with existing challenges allowing for a limited amount of growth as the designs are based on previously envisaged growth rates rather than the much more ambitious level proposed in these consultations. This means the need for careful planning to ensure proposed development is in the most appropriate place with the necessary facilities and infrastructure available at the right time and a steep change both in the provision and take up of public transport, if this level of development is to be sustainable.</p> <ul style="list-style-type: none"> <li>• Natural England – transport infrastructure provides an opportunity to achieve net gain in nature through biodiversity enhancement and linkage of habitat corridors.</li> <li>• Historic England – A120 has archaeological potential.</li> <li>• Colchester Hospital Trust - Growth in housing has implications for local hospital services. Concerns over population figures in Infrastructure Delivery Plan - growth underestimated.</li> <li>• Details on how modal shift to non-car transport methods can be achieved needs to be provided before there can be confidence on lower car use in new developments.</li> <li>• Introduce visionary new ideas for movement involving collaboration with transport providers.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• Sport England – Strategic infrastructure should include leisure and sport, to ensure benefits of co-location and encouraging active lifestyles.</li> <li>• Developers can only provide the mechanisms to allow infrastructure providers to provide services – it cannot provide the services.</li> </ul>
SP6: Place Shaping principles	23	<ul style="list-style-type: none"> <li>• In view of its deterioration, allow town centre to be replaced with housing and allow edge of centre retail growth.</li> <li>• Development proposals need to include green spaces to address of loss of countryside.</li> <li>• Large scale communities can't respond to local character. Density shouldn't exceed 60 units per hectare.</li> <li>• Plan must exhibit a degree of common sense on car usage.</li> <li>• Inability of location to be self-contained</li> <li>• Lack of sense of community</li> <li>• Infrastructure budget too low and financial model is flawed. The likely result is short-cuts in delivery of principles set out in SP6</li> <li>• Location wrong for Colchester Braintree Borders GC: high commuting</li> <li>• Design codes can play a part but over dependence on them can make master plans too rigid. Plan making process should be process rather than product orientated.</li> <li>• Two sources of design policy in SP6 and DM15 is unhelpful and will cause ongoing confusion.</li> <li>• Needs to be greater emphasis placed on the importance of recognising and protecting the integrity of existing places.</li> <li>• Each phase of development needs to be sustainable in its own right.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• Natural England – strengthen policy to ensure new development incorporates biodiversity creation.</li> <li>• Require ‘high’ standards rather than ‘highest’.</li> <li>• Policy is overly prescriptive in relation to design, public realm, parking and green/blue infrastructure. Blue infrastructure not defined.</li> </ul>
SP7		<ul style="list-style-type: none"> <li>• Infrastructure needs to be guaranteed to be delivered before housing</li> <li>• Delivery of Garden Communities must be in context of meeting housing delivery targets for plan period</li> <li>• Provision for places of worship should be included</li> <li>• Allowances for infrastructure and contingency are too low. No evidence of sound financial risk assessment.</li> <li>• No evidence that policy of promoting sustainable travel will work</li> <li>• No housing need evidence for post-2033 period.</li> <li>• Objectively Assessed Housing Need not properly assessed.</li> <li>• CAUSE summary of points covered in their submission: <ol style="list-style-type: none"> <li>1. Detailed amendments required</li> <li>2. Comments on Sustainability Appraisal</li> <li>3. New towns: learning from the past</li> <li>4. Positive vision for north Essex</li> <li>5. OAN - unnecessary uplifts applied</li> <li>6. Providing for employment</li> <li>7. Rail constraints</li> <li>8. Connectivity &amp; infrastructure</li> <li>9. Viability: West Tey's business case</li> <li>10. West Tey: Costs &amp; Risks</li> <li>11. The deal for land-owners</li> <li>12. Community engagement</li> </ol> </li> <li>• Not certain necessary infrastructure including road and rail improvements, health, schools, etc., can be secured ahead of development.</li> <li>• Lack of rationale on choice of sites.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• Highways England - Strong interdependence between these proposals and the improvements to the A12 and A120 and it will be essential that we work together to achieve our strategic objectives and ensure the evidence base is robust. Cumulative impact assessment should be carried out on the impact of development of growth in villages and in the early part of the plan period.</li> <li>• No economic base</li> <li>• Start with East Colchester first to gain expertise</li> <li>• Use low quality agricultural land at Middlewick before high quality at West Tey.</li> <li>• South Colchester should be developed to release funds for necessary transport infrastructure before greenfield land to the west of Colchester.</li> <li>• Delivery mechanism needs to be established before garden communities included in the plan.</li> <li>• Concerns regarding proposed Local Delivery Vehicles. Alternative models and funding option should be explored, ie collaborative tenure with developer or strategic finance partner.</li> <li>• LDVs provide for tighter control over development, but scale of proposals for three concurrent garden communities raises concern about ability and capacity of LDV to deliver all Section 1 proposals.</li> <li>• Insufficient community engagement</li> <li>• Affordable housing target of 30% queried for its deliverability and effect on viability.</li> <li>• Consideration required of impacts and relationship with adjoining communities.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• Natural England – Green infrastructure should be delivered according to defined standards. Need to identify how net gain in local biodiversity is to be achieved.</li> <li>• More guidance needed on ancillary facilities including retail and leisure uses.</li> <li>• Historic England – Need demonstrable consideration of impact of Garden Communities on the historic environment. Plan should contain a framework to guide how boundaries and extent of garden communities are determined. Consideration of impacts and relationship with adjoining communities.</li> <li>• Scale should be reduced – too big in relation to existing communities.</li> </ul>
SP8		<ul style="list-style-type: none"> <li>• Guarantee infrastructure is provided before housing is built.</li> <li>• Provide good quality link road from A120 to A133 as an early part of development.</li> <li>• North East Essex Clinical Commissioning Group – Primary healthcare facilities to be provided as appropriate.</li> <li>• All new development should be over the brow of the hill and out-of-sight of existing residents.</li> <li>• Public transport and Park and Ride aspirations are unrealistic</li> <li>• Anglian Water - Reference welcomed to an upgrade to Colchester waste water treatment plant and off-site improvements to the foul sewerage network. Refer to the phasing of improvements to align the scale and timing of the proposed garden community given that development is expected to come forward after 2033.</li> <li>• Loss of excellent agricultural land opposed.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• Potential impact on European designated sites</li> <li>• Affordable housing not well located for Tendring residents nor will it help foster economic growth in Tendring.</li> <li>• Lack of detail on proposed Salary Brook County Park, therefore insufficient protection of endangered species and distinctive sense of place. Essential that Salary Brook valley and adjacent woodland is safeguarded.</li> <li>• Lack of mention of existing flooding issues in area – specific mitigation needed to prevent exacerbating the problem.</li> <li>• Need to adhere to a 1.5 km buffer between Greenstead/Longridge and the new settlement. Housing must be beyond tree line at top of hill to the east of Greenstead/Longridge.</li> <li>• No building south of A133.</li> <li>• Rapid transport links need to include cycle lanes.</li> <li>• Concerns about traffic on existing country lanes.</li> <li>• Noise shielding for new roads needed.</li> <li>• Historic England – concerned that new settlements will be housing led rather than considering the landscape and heritage assets.</li> </ul>
SP9		<ul style="list-style-type: none"> <li>• Concerns over rail capacity, parking capacity at stations, and potential changes to location of Marks Tey station</li> <li>• Objections to loss of Grade 2 agricultural land, poorer quality land should be considered first.</li> <li>• Current infrastructure inadequate.</li> <li>• Infrastructure, including upgraded A120 and A12, health and schools needs to be in place before houses built, but high levels of uncertainty</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<p>regarding timings and likelihood of critical transport infrastructure improvements required in advance.</p> <ul style="list-style-type: none"> <li>• Green buffers for existing settlements should be designated and shown on proposals maps.</li> <li>• Policy should be more positive and precise as to integration with Marks Tey by reference to built environment, traffic, enhancements and retention of village identity and access to countryside.</li> <li>• Proposal would create a commuter town following on from its location on rail line to London.</li> <li>• Economic basis for proposal has not been made- unclear where jobs would come from.</li> <li>• Extent of proposed Garden Community unclear – lack of consistent mapping between authorities.</li> <li>• Provision of places of worship should be specifically mentioned.</li> <li>• Anglian Water – agree that upgrade to waste water treatment plant and off-site improvements to foul sewerage network. Refer to phasing of improvements to align scale and timing beyond plan period.</li> <li>• Begin with East Colchester Garden Community before starting on West. Inclusion of West Colchester is premature.</li> <li>• Massive Government subsidies would be required.</li> <li>• Negative effect on rural setting and character of existing villages.</li> <li>• No meaningful public transport provided until 2030.</li> <li>• CAUSE -CBBGC not deliverable, viable or sustainable option, nor will it meet infrastructure requirements of its own population or current local population of Braintree and Colchester.</li> <li>• Scale is too large</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• Natural England. Adequate water treatment infrastructure should be included as a safeguard to ensure that phasing of development doesn't exceed capacity. Concerns about strength of protection and enhancement of natural environment.</li> <li>• Historic England – No indication as to how extent of garden communities will be determined. Concern that new settlements will be housing led rather than considering landscape and heritage assets. Potential for significant archaeological interest in the A12 and A120 area, along with listed buildings.</li> <li>• Public transport aspirations are unrealistic.</li> <li>• No Plan B if Garden Community is not located by proposed A120/A12.</li> <li>• Clearer reference to Garden Community principles should be included.</li> <li>• Potential location for Tiptree spur road on/off the A12 needs to be defined.</li> <li>• Developer concerns over affordable housing viability.</li> <li>•</li> </ul>
SP10		<ul style="list-style-type: none"> <li>• Guarantee infrastructure is provided before housing is built.</li> <li>• Anglian Water – Refer to phasing of improvements to align scale and timing of garden community given that development is expected to come forward after 2033.</li> <li>• Places of worship should be allocated.</li> <li>• Integrity of existing settlements such as Rayne and Stebbing would be under threat from proximity of proposals.</li> <li>• Financial viability questioned</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• Lack of attention to safeguarding natural and historic amenities such as historic airfield at Andrewsfield.</li> <li>• Developer concerns over affordable housing viability.</li> <li>• Historic England – proposed garden community could have significant impact of setting of Saling Grove listed building and garden. No indication as to how extent of garden communities will be determined. Stronger references to heritage asset safeguarding needed.</li> </ul>
<b>SECTION 2</b>		
Vision and Objectives		<ul style="list-style-type: none"> <li>• Natural England – Policies required on soil and land quality and on consideration of best and most versatile agricultural land</li> <li>• Historic England – Vision is too Town Centre focused. Objectives should include more explicit reference to whole Borough’s historic environment.</li> <li>• Essex Wildlife Trust – Objectives should commitment to wildlife corridors.</li> <li>• Plan shouldn’t rely on neighbourhood plans to allocate sites.</li> </ul>
Strategic Policies SG1-SG8		<ul style="list-style-type: none"> <li>• Strategy for Garden Communities criticised for choice of location; lack of infrastructure; lack of job creation potential; loss of agricultural land.</li> <li>• More development needed to address short time housing need. Allocate more small sites, sites in small settlements.</li> <li>• Incorrect to assume continuation of high housing growth levels in Colchester.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• Different areas of Colchester not all equal in terms of sustainability and role as place. Stanway should be ranked higher in settlement hierarchy.</li> <li>• Historic England – Refer to both landscape and historic character, not just landscape.</li> <li>• Developers raised concerns over methodology used to calculate housing supply. Contingency needed to address potential non-delivery. OAHN is underestimated since it doesn't adequately consider increased migration from London; the ability of London to meet housing needs; or effectively assess key market signals.</li> <li>• Lack of clarity on sources of economic growth, particularly for local jobs to avoid reliance on London and commuting.</li> <li>• Too much employment land allocated – flooding the market doesn't necessarily reduce price and render sites more viable.</li> <li>• Allocate employment sites in small villages.</li> <li>• Centres hierarchy on Tollgate should be revisited in light of its increasing prominence. Further work needed on retail evidence following Tollgate appeal decision.</li> <li>• More evidence on impact thresholds for retail proposals required – thresholds queried.</li> <li>• Improved digital connectivity required to enable growth.</li> <li>• Health (including NE Essex Clinical Commissioning Group and Colchester Hospital Trust) – Health sector needs to be fully engaged throughout process to ensure appropriate levels of health infrastructure.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<p>Hospital Trust queried population and housing basis of Infrastructure Delivery Plan.</p> <ul style="list-style-type: none"> <li>• Questions on accuracy and viability of Infrastructure Delivery Plan – reflect organisational commitments? Lack of statutory connection between the LDP and Local Plan.</li> <li>• More clarity needed on differences between strategic and local infrastructure.</li> <li>• Concerns about legal agreements to increase contributions should viability improve during construction phase since costs can both rise and fall until completion.</li> <li>• Natural England – Develop recreational Avoidance and Mitigation Strategy. To address measure required to mitigate impacts on protected sites.</li> <li>• Impact on deliverability and viability of providing infrastructure first questioned by developers.</li> <li>• More clarity needed on the relationship between Neighbourhood Plans and Garden Communities.</li> <li>• University of Essex – location for medium to long term expansion of University Campus identified in Wivenhoe Neighbourhood Plan but not in Local Plan.</li> <li>• Concern that neighbourhood plans take a long time to produce and are not initiated directly by the Council, causing uncertainty for developers and delay housing delivery.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
Environmental, Climate Change and Generic Infrastructure Policies ENV1-ENV5 & CC1 -		<ul style="list-style-type: none"> <li>• RSPB and Natural England – Include specific mention to Recreational Avoidance and Mitigation Strategy (RAMS)</li> <li>• Maps required to clarify areas protected for environmental designations.</li> <li>• Proper evaluation needed to alternative approaches to providing green infrastructure for Garden Communities.</li> <li>• Environment Agency – Recommend further wording requiring biosecurity protocol method statement prevent the spread of invasive non-native species.</li> <li>• Historic England – text should set out how the suite of strategic and development management policies protect the historic environment beyond policy DM16.</li> <li>• Essex Wildlife Trust – policy lacks a clear commitment to ensuring that developers aim to achieve a net gain in biodiversity.</li> <li>• Policy objectives should not be cumulative but should be considered individually.</li> <li>• Local Nature Reserves should be protected.</li> <li>• University of Essex objects to extension of Coastal Protection Belt to include land on east side of river which is currently allocated for an extension to the University campus.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• Objections to deletion from Coastal Protection Belt of land lying to the east and south of Wivenhoe.</li> <li>• Natural England – caution should be used around term ‘irreplaceable’. Policy could be strengthened by inclusion of seascape as well as landscape character.</li> <li>• Environment Agency – Plan should identify a Coastal Change Management Area for any area likely to be affected by physical changes to the coast to make clear what development could be appropriate. A CCMA should be identified for Mersea Island.</li> <li>• Concerns over requirement that development must demonstrate a coastal location is required.</li> <li>• Environment Agency – add text on contributing to protection and enhancement of water bodies.</li> <li>• Historic England Any policy encouraging energy efficiency should not that application will be different in relation to certain classes of historic buildings.</li> <li>• Individual developments would not necessarily be expected to meet Borough-wide needs. Explanation lacking of the requirements expected of a developer when considering whether to bring a scheme forward.</li> </ul>
Centre Policies TC1-4		<ul style="list-style-type: none"> <li>• Historic England – Strengthen wording on protection of heritage assets and their settings. Infrastructure accompanying transport works in historic areas can have a significant detrimental impact – wording needed to address this.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• Retail impact thresholds are too restrictive. Insufficient flexibility to allow for introduction other non-A1 uses.</li> </ul>
North Colchester Policies NC1-NC4		<ul style="list-style-type: none"> <li>• Community building a requirement.</li> <li>• Concerns about rugby ground proposal -maximum of 200 dwellings on site to ensure compatibility with surrounding area. Opposition to loss of habitat.</li> <li>• North Colchester Transport Plan is flawed – no more traffic should use Mill Road.</li> <li>• Highways England – Development could have a severe impact upon A12 and A120. Traffic Impact Assessment needed. This section of the A12 subject to a study for potential widening.</li> <li>• Allocation for 70 units south west of the Braiswick golf club does not fit with other policies in the plan. It would cause visual impact on views from West Bergholt and coalescence of West Bergholt with Colchester.</li> <li>• Improved infrastructure, road network improvements and vastly improved public transport links are required in the North Colchester/North Station/Northern Gateway areas, (along with suitable car parking at sports facilities) or whole area will be at a standstill.</li> <li>• Aspirations for developer-supported bus services not accompanied by evidence of deliverability.</li> <li>• Objection to proposed multiplex cinema at Northern Gateway due to impact on Odeon Cinema.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
South Colchester Policies SC1 - 3		<ul style="list-style-type: none"> <li>• No measures shown to alleviate the inevitable increased volume of traffic the new Gosbecks and Berechurch Hall estates will generate in Shrub End.</li> <li>• Any proposed development in Gosbeck area needs to pay careful regard to sensitive archaeology and biodiversity of area.</li> <li>• Essex County Council – Ensure provision for provision of a primary school and early years and child care facilities as a direct result of the Middlewick development and to meet education needs arising from other Local Plan allocations in south Colchester</li> <li>• Objections to Middlewick allocations: <ol style="list-style-type: none"> <li>1. Traffic congestion already a problem - busy Mersea Rd and Berechurch Hall Rd. Junction Abbots Road and Old Heath Road very narrow and not suitable for site traffic Where will proposed access to new estate be?</li> <li>2. Lack of other infrastructure - School places, sewers, community facilities, and health provision an issues..</li> <li>3. Destruction of green space.</li> <li>4. Proposal came in later than other sites considered through plan-making process</li> <li>5. Loss of biodiversity and wildlife – concerns over loss of the diverse woodland and heathland habitats and 2 protected species. A Local Wildlife site which warrants SSSI designation.</li> <li>6. History – archaeology needs to be preserved.</li> </ol> </li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<p>7. Healthy living. More pollution and noise. Concerns about contamination with ammunition, carcasses from foot and mouth epidemic.</p> <p>8. Public Transport. Bus routes are not easily accessible as mentioned.</p> <p>9. Queries over need for development -housing numbers already sufficient and can be met elsewhere.</p> <p>10. Reject housing proposal and create a South Colchester County Park.</p> <p>11. Few employment opportunities close by for residents.</p> <p>12. Lack of confidence in Council's ability to deliver supporting infrastructure.</p>
East Colchester Policies EC1-EC4		<ul style="list-style-type: none"> <li>• University of Essex – support thrust of EC1, but have concerns principally relating to the deletion of the existing land identified for campus expansion; the lack of information about the Orbital route; and the working of the paragraphs requiring possible contributions to offsite infrastructure.</li> <li>• Sport England University site includes a lot of sports infrastructure which merits protection.</li> <li>• Masterplan needed to clarify boundaries of Garden Community and University expansion.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• Capacity for further expansion at Whitehall queried given traffic and air quality issues.</li> <li>• Provide access for all user groups, including equestrians.</li> </ul>
West Colchester WC1 – WC5		<ul style="list-style-type: none"> <li>• Highways England – Development at West Colchester could have a severe impact upon the A12 and A120. We would wish to see a traffic impact assessment demonstrating the potential impacts of such a proposal. Of particular concern are junctions 25,26,27,28&amp;29. There may also be impacts upon the main line. However, although these need to be quantified this section of the A12 is subject to a study for potential widening.</li> <li>• Stane Park developer - Policy needs redrafting in light of Tollgate decision to reflect Stanway's position in spatial hierarchy. Zone one needs to be reduced in extent to remove land at Stane Park, with related criteria altered to better facilitate economic growth. Inappropriate to have blanket policy not permitting main town centre uses. An additional Zone Three should be introduced for Stane Park recognising its strategic opportunities designating it for commercial uses that have a beneficial synergy with relevant components of the Economic Area.</li> <li>• Historic England - though Stanway has an established economic role and has seen much new development, there remain a number of listed buildings in the area whose setting and continued beneficial use should be considered as the area is identified for growth.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• NE Essex CCG - Significant proposed developments will require Health to be involved with developers in the early stages and appropriate mitigation sought to enable the appropriate Health infrastructure for this growing community. Previous experience has meant that lack of engagement with both NHS England and the CCG has resulted in poor infrastructure and no mitigation to support the existing premises.</li> <li>• Objection to Chitts Hill – noise pollution and poor public transport links</li> <li>• Land off Dyers Road – concerns over highways infrastructure. Consider closing Dyers Road at Warren Lane junction to stop use as rat run.</li> <li>• Sport England – Chitts Hill site – buffer zone for playing fields required to ensure no risk of ball strike issues.</li> <li>• Policy should be amended to reflect Tollgate appeal decision – revise WC1 re Strategic Economic Area and Policy WC2 to remove housing allocation on former Sainsbury’s site.</li> <li>• Objection to Irvine Road site – poor or no access, ecological implications and better alternative sites available elsewhere. Whole site should be retained as a wildlife orchard.</li> <li>• Lack of evidence to support aspirations for increased bus use.</li> </ul>
Sustainable Settlements		<ul style="list-style-type: none"> <li>• Developers/landowners have proposed various sites in and adjacent to Sustainable Settlements as alternatives to those proposed in the plan.</li> <li>• Objections to Abberton and Langenhoe allocations – <ul style="list-style-type: none"> <li>-No village amenities, not a sustainable location</li> <li>-Additional traffic detrimental</li> <li>-Loss of countryside, effect on wildlife in and around reservoir</li> </ul> </li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>-Disproportionate addition to village</li> <li>-Negative urbanising effect on village setting and landscape character- more lighting, noise</li> <li>- Inadequate existing infrastructure, ie water and broadband</li> <li>• Objections to Copford allocations – <ul style="list-style-type: none"> <li>Traffic levels already high in area.</li> <li>Housing numbers disproportionate to other villages.</li> <li>Impact on natural and historic landscape</li> <li>Alternative brownfield sites should be used.</li> <li>Queensberry Ave. specific points</li> <li>Access to new development through existing residential street not suitable – separate access required.</li> <li>Hall Road specific points</li> <li>Loss of woodland and river valley landscape rich in birds and wildlife.</li> <li>Site adjacent to Local Wildlife site.</li> <li>Not adjacent to village amenities.</li> <li>Poor access with insufficient width available to create two car width road with pavement.</li> <li>Development will compromise the setting of listed buildings.</li> </ul> </li> <li>• Objections to Fordham allocation – <ul style="list-style-type: none"> <li>Loss of agricultural land</li> <li>Primary school capacity an issue.</li> <li>Negative effect on listed building</li> <li>Would add to safety concerns and congestion on Plummers Road</li> </ul> </li> <li>• Objections to Great Horkeley allocations</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<p>Negative impact on existing infrastructure and services ie road network, health provision and school.  Area already has accepted sufficient development.  Effect on wildlife.</p> <ul style="list-style-type: none"> <li>• Objections to Great Tey allocations  Late addition to plan has meant consultation is inadequate.  Lack of village amenities, jobs and services  Increase in traffic – lack of public transport  Sewage inadequate.  Negative effect on conservation area, rural character  Level of development disproportionate to small village.  New Barn Road/Greenfield Drive specific points  Problematic access through existing estate  Extra traffic on narrow lanes.  Negative visual effect on open countryside and views over Roman River valley.  Loss of greenfield site, brownfield should be used.  Environmental and wildlife impact.  Further playing fields not required.</li> <li>• Objections to Langham allocations  Level of development disproportionately high compared to other villages and compared with lack of services within village.  Essential infrastructure needs have been unmet.  Backfill estate type development would destroy special rural historic character.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<p>Water/sewage infrastructure already at capacity.  Resident views gathered in surveys haven't been taken on board.  School road development would exacerbate existing dangerous traffic management problems with school adjacent to business use.</p> <ul style="list-style-type: none"> <li>• Objections to Layer de la Haye allocation:  Appropriate vehicular access needs resolution  Development would stress existing limited community infrastructure.  Negative effect on village character.  Existing roads inadequate – more traffic will cause further pollution, noise and potential danger to pedestrians.  Negative effect on local wildlife and habitats.</li> <li>• Objections to West Mersea  Unique island position of Mersea reduces its development capacity due to access and environmental constraints.  Infrastructure already constrained, ie health, schools, water/sewage, parking. New development would need to expand infrastructure.  No evacuation plan for Bradwell.  Extra sports facilities queried as appropriate planning gain for development.  Loss of agricultural land.  Housing numbers for Mersea queried due to year round residents in caravans.  No justification for reducing land within Coastal Protection Belt.  Impact on habitats and designated sites.  Build on brownfield land elsewhere.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<p>Neighbourhood Plan will guide development. Dawes Lane specific comment- Widening of full length of Dawes Lane required.</p> <ul style="list-style-type: none"> <li>• Coast Road policy issues- Houseboats - Scale and density of proposed developments must be controlled to protect historic authenticity of the marine foreshore from large residential non marine development. Development of historic vacant sites could increase potential environmental hazard.</li> <li>• Caravan policy issues – Problems with incremental growth of caravans and year-round occupancy straining local infrastructure and adding to traffic congestion. Policy should be tightened up to limit further extensions of caravan parks.</li> <li>• Objections to Rowhedge allocation – Loss of employment. Rowhedge has already accepted enough new housing. School capacity an issue. NE Essex CCG – Provision of healthcare being explored in context of new models for healthcare delivery, however no infrastructure formally approved yet. Location is peripheral to main village – lack of public transport.</li> <li>• Objections to West Bergholt policy Proposed area of growth doesn't fit within landscape objectives in Landscape Character Assessment. Negative impact on local facilities.</li> </ul>

LOCATION / PLACE POLICY	Total Reps Submitted to Colchester	Key Issues of Concern raised in Representations
		<ul style="list-style-type: none"> <li>• Objections to Other Villages and Countryside Policies Some small settlements considered to fall within 'other villages' rather than 'countryside'. Developers reps supporting greater flexibility for development in small settlements.</li> </ul>
Development Management Policies		<ul style="list-style-type: none"> <li>• DM8 Affordable Housing Deliverability of 30% target and lower threshold for rural areas queried by developers DM11 Gypsies, Travellers and Travelling Showpeople Cllr. Oxford -Capacity at Severalls Lane is 3 not 6 pitches. DM12 Housing Standards Developer concerns raised over evidence for enhanced standards for accessibility and space standards. DM19 Private Amenity Space Developer concerns over insufficient flexibility on amenity space standards. DM20 Promoting Sustainable Transport and Changing Travel Behaviour Public transport aspirations, including Park and Ride, are unrealistic. Better provision for electric vehicle charging points required.</li> </ul>

