

13th December 2021

Report of	Assistant Director of Place and Client Services	Sandra Scott ☎ 282975
Title	Supplementary Planning Document for the ABRO Site	
Wards affected	New Town and Christchurch	

1. Executive Summary

- 1.1 The DSG site (formerly known as ABRO) forms part of the Defence Estate and was previously used for army vehicle servicing. A decision has been made to dispose of the site as it is no longer required for military purposes and marketing began in November. The site is located in an historically sensitive location, and, for this reason, a development brief has been prepared to provide planning guidance on the issues and opportunities associated with the site and to provide a clear and robust development framework to aid the future smooth delivery of a suitable development scheme. At the Local Plan Committee on 2nd August 2021 Members agreed to adopt the development brief as adopted a planning guidance document, but also requested that the Development Brief be upgraded to a Supplementary Planning Document which will be afforded more weight than planning guidance. The additional requirements for a Supplementary Planning Document (SPD) include the need for a Strategic Environmental Assessment, screening and further consultation. These have now been carried out and the Committee are being asked to formally adopt the Development Brief as a Supplementary Planning Document.
- 1.2 The ABRO Supplementary Planning Document was one of the last significant pieces of work which Alistair Day undertook, and it is a reflection of both his knowledge and commitment to preserving and enhancing the heritage of Colchester. If members see fit a tribute will be included in the SPD.

2. Recommended Decision

- 2.1 To adopt the ABRO Development Brief as a Supplementary Planning Document.

3. Reason for Recommended Decision

- 3.1 The adoption of the ABRO Development Brief as a Supplementary Planning Document will set out key parameters of how this site should be developed; once adopted, the brief will inform the key planning policy requirements for consideration when determining planning applications.

4. Alternative Options

- 4.1 Members could decide not to adopt the ABRO Development Brief as a Supplementary Planning Document. It would remain adopted guidance. If this option is chosen, it would weaken the weight afforded to the development brief when considering future planning applications and thereby potentially reduce the ability of the Council to shape the redevelopment of this important site.

- 4.2 Alternatively, Members could decide to revise the ABRO Development Brief.

5. Background Information

- 5.1 The ABRO site was used as a military vehicle repair facility. The site was vacated in about 2019 and has not been used since that time. It is understood that Defence Estates intend to dispose of the site in the very near future for redevelopment.
- 5.2 The site is within an historically sensitive location. Along the southern edge of the site lies the Roman Circus Scheduled Ancient Monument (SM). Discovered in 2005, it is the only known Roman Circus in Britain. The Benedictine Abbey of St John, which is also scheduled, is located to the east of the site. The site is thus located within an area of archaeological importance and there is high potential for encountering (unknown) below-ground archaeological remains of significance. The site was previously part of the Royal Artillery Barracks (later known as Le Cateau Barracks) which was initially constructed in 1874 - 75. The barracks complex featured stable blocks, living quarters, gun sheds, offices, a water tower, coal yard and guard house, along with schools, stores and recreational areas. The barracks were enclosed by a high brick boundary wall, part of which runs along the northern boundary of the ABRO site. Artillery Barracks Folley runs along the outer edge of the wall and appears to date back to this time. The Officers' Quarters - which adjoins the site to the southeast is listed Grade II listed and has recently been converted into housing. Within the site, most of the original barracks' buildings have been demolished. There are however two buildings of potential historic or architectural value; these are the Infirmary Stables and the Carpenters and Telecommunications Shop, both of which are built onto the boundary wall along the northern edge of the site. The Garrison Conservation Area has recently been extended to include the ABRO site. The Town Centre Conservation Area (Colchester Conservation No.1) adjoins the north eastern corner of the site.
- 5.3 The site is some 300m to the south of Colchester town centre and is situated in an accessible location. The redevelopment of this site has the potential to provide high quality housing that is befitting the rich architectural heritage of Colchester. The site occupies approximately 4.3 hectares of land, 3.8 hectares of which has been allocated for residential use within the Emerging Local Plan. The Roman Circus Scheduled Ancient Monument extends over the southern part of the site and forms the remaining 0.5 hectares of land, which is allocated as open space in the Emerging Local Plan. The purpose of preparing a development brief as a Supplementary Planning Document for this site is to provide guidance on issues and opportunities and to set out the Council's aspirations for the redevelopment of this important site. The document provides a clear and robust development framework, which is intended to help for the smooth delivery of a suitable scheme.
- 5.4 As reported in August an informal 'light touch' consultation exercise was initially undertaken with Members, the landowner, Colchester Archaeological Trust, the Civic Society, Historic England, the Highway Authority and Essex Police in March / April 2020. The comments made by these organisations and interest groups were taken into account in drafting the development brief that was subject to a formal public consultation exercise between 8 February 2021 to 8 March 2021. This was reported on in August 2021.
- 5.5 In accordance with the Planning Regulations for a Supplementary Planning Document there was further public consultation on the Development Brief. This ran for 4 weeks from 22nd October until Friday 19th November 2021 and was available on the Council's website. All statutory consultees were notified together with anyone who has engaged in the earlier consultation. In total 12 responses were received and a summary of the representations

received together with the officer response is set out in Appendix 1. In addition to the amendments made in relation to comments received on the draft brief, officers have also amended the text of the brief to reflect the updated local plan position and to recognise the change to a Supplementary Planning Document.

- 5.6 In accordance with the relevant regulations the Supplementary Planning Document has been assessed against the criteria set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004, or Annex II of the SEA Directive 2001/42/EC. The local planning authority has concluded that the Supplementary Planning Document is not likely to have significant environmental effects and consequently a Strategic Environmental Assessment (SEA) is not required. The criteria specified in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004 has been taken into account in reaching this conclusion. As required under regulation 9(2)(b) the necessary consultation bodies (Historic England, Natural England and the Environment Agency) have been consulted and all concur with this conclusion, enabling the local planning authority to formally determine that an SEA is not required. The screening opinion will be updated as required.

6. Equality, Diversity and Human Rights implications

- 6.1 None directly arising from this report.

7. Strategic Plan References

- 7.1 The Supplementary Planning Document - Development Brief for the ABRO site accords with the objectives of the Strategic Plan to:
- Strengthen Colchester's tourism sector and welcome more visitors each year; and
 - Protect, enhance and celebrate Colchester's unique heritage.

8. Consultation

- 8.1 The Supplementary Planning Document has been the subject of a public consultation exercise in accordance with the requirements of the Planning Regulations. A number of comments and support have been received with no objections in principle raised. Where appropriate comments have been incorporated into the brief.

9. Publicity Considerations

- 9.1 The Supplementary Planning Document has been subject to publicity as a part of the public consultation exercise; any further publicity associated with the adoption of the development brief should be seen in a positive light.

10. Financial implications

- 10.1 Appeals against a planning refusal can expose the Council to significant expense and costs where the Local Planning Authority is seen to have acted unreasonably. The provision of the Development Brief as a Supplementary Planning Document will increase developer certainty and will become a key policy consideration in the determination of planning application, thereby reducing risk of an appeal.
- 10.2 Work to produce the SPD and carry out consultation was undertaken by officers and within existing budgets.

11. Health, Wellbeing and Community Safety Implications

11.1 None identified.

12. Health and Safety Implications

12.1 None directly arising from this report.

13. Risk Management Implications

13.1 The provision of a Development Brief as a Supplementary Planning Document for the DSG site will serve to inform planning decisions and is based on policies within the Local Plan which will help to reduce the risk of inappropriate development being permitted.

14. Environmental and Sustainability Implications

14.1 In order to support the achievement of sustainable development, the Supplementary Planning Document recommends that new development is undertaken in the most sustainable way possible, delivering the Council's social and economic aspirations without compromising the environmental limits of the area for current and future generations. The brief recommends that new buildings seek to fully integrate sustainable design and construction with urban design to ensure the delivery of a high-quality new development and to maximise the opportunities to enhance the environmental performance of new development. The Brief relates to the reuse of previously developed land in a highly sustainable location. A screening opinion carried out under the Environmental regulations 2004 has been carried out and concluded that the Supplementary Planning Document is not likely to have significant environmental effects and consequently a Strategic Environmental Assessment (SEA) is not required.

Appendices

Appendix 1: Summary of comments received and Officer response.

Appendix 2: Final Draft Supplementary Planning Document ABRO Development Brief

Background Papers

The Emerging Local Plan

Appendix 1:**Summary of comments received to the additional consultation October 22nd / 19th November 2021 and Officer response.**

Comment source	Representation	Officer comment
Anglian Water	<p>Correct the 'Anglia' typo in the final bullet point in section 2.15</p> <p>To follow up the points in the SPD to engage early with Anglian Water and specifically the recommendation that the site promoter engage with the Developer Services team at planningliaison@anglianwater.co.uk to consider the water supply and waste water network options. This would also assist the site promoter in being able to advise the Council whether the site can be brought forward utilising connections to the existing water supply and waste water network. Or alternatively whether the ABRO site will require investment in the Colchester Waste Recycling Centre similar to the capacity requirement identified in the Infrastructure Delivery Plan for the Garden Community.</p> <p>As indicated by the SuDS sections in the SPD that no surface or rainwater drainage is directed to the public sewer network as these are managed via SuDS solutions. In addition that flood risk mitigation, including making a proportionate contribution to off-site drainage improvements and biodiversity enhancement and net gain, are part of the design.</p> <p>The SPD should include a requirement to consider rainwater harvesting and use of greywater for non-potable domestic water uses such as WC flushing and garden watering to achieve higher levels of water efficiency.</p>	<p>Corrected</p> <p>Noted</p> <p>Noted</p> <p>Noted – Picked up in DM25 Local Plan Policy</p>
Historic England	<p><i>General comments:</i> We support the preparation of this Supplementary Planning Document (SPD), and are pleased to see the numerous references to the historic environment within the SPD, including acknowledgement of the important role that the local historic environment plays in place-making. The SPD makes numerous references to the special qualities of the ABRO site and its surroundings - the Roman Circus Scheduled Monument (SM), the Garrison Conservation Area, the Colchester Conservation Area No.1 (which includes numerous listed and locally listed buildings) and St John's Abbey SM - which we support.</p> <p>With regards to the screening for a Strategic Environmental Assessment, we support the conclusion that neither an SEA nor an HRA are required for the ABRO Development Brief Supplementary Planning Document.</p>	<p>Noted</p> <p>Confirms SEA screening opinion which will be updated.</p>

	<p>We note that in general, design will be informed by the Essex Design Guide and will complement and reinforce the best elements of the built and natural environment. In particular, reflecting the Garrison setting, we note that layout will be predominantly regimented into distinct lines of buildings, rather than rely on organic layouts. We are also encouraged to see that the historic Garrison boundary wall will be preserved where possible and recognition that the Infirmary Stables (IC3), the Carpenters and Telecommunications Shop (IC4) and The Restaurant/Canteen (IC7) constitute non-designated heritage assets.</p> <p><i>Timescales for technical evidence:</i> Notwithstanding the above, our main concern relates to the lack of clarity regarding the timescales for the preparation of technical evidence. Although archaeology is adequately addressed by the SPD (the Roman Circus SM and its setting are discussed throughout the report), there is little analysis with regards the potential impacts of development upon the significance of built heritage, including impacts resulting from a changing in their setting. We note that a desk-based assessment will be required prior to the determination of any planning application for the site (paragraph 3.12), but consider that this is too late in the process, and that a Heritage Impact Assessment (HIA) should be prepared now so that it can inform the SPD, including any specific development criteria required. Our Advice Note 3 'The Historic Environment and Site Allocations in Local Plans sets out a suggested approach to assessing development proposals and their impact on heritage assets. It advocates a number of steps, including understanding what contribution a site, in its current form, makes to the significance of the heritage asset/s, and identifying what impact development might have on significance. This could be applied to the assessment of the ABRO site. In essence, it is important that you: 1. Identify the heritage assets on or within the vicinity of the ABRO site at an appropriate scale; 2. Assess the contribution of the ABRO site (in its present state) to the significance of heritage assets on or within its vicinity; 3. Identify the potential impacts of development upon the significance of heritage asset including impacts resulting from a changing in setting; 4. Consider how any harm might be removed or reduced; 5. Consider how any enhancements could be achieved and maximised; and 6. Consider and set out the public benefits where harm cannot be removed or reduced Looking at the above, it can be seen that the draft SPD only really deals with the first step of the 5-step process (in relation built heritage) and does not comprise a full heritage impact assessment. Given the sensitivity of the site we consider that a (proportionate) Heritage Impact Assessments (HIA) should be prepared now. This front-loading of evidence will mean that the appropriate design principles can be integrated into the SPD providing a clear design vision and will ensure that development will be sympathetic to local character and the historic environment. It will also reduce uncertainty for developers, minimising abortive work and the amount of negotiation required over any subsequent planning applications. Notwithstanding the above, should you wish to proceed with the SPD in the absence of an HIA, then we strongly advise this evidence is prepared at the earliest possible stage in the process, and that you review the draft SPD to ensure that it is sufficiently flexible to</p>	<p>Noted</p> <p>The reference to the need for an HIA at this stage was not referred to in previous responses from HE.</p> <p>The Brief is based on a good understanding of the heritage assets and provides a sound basis for the SPD. An HIA at this stage is not considered to add anything further. It will however be a requirement to support a Planning Application with a proposed scheme.</p> <p>It is Suggested that Paragraph 3.12 be amended to refer to "Any application will require the submission of a comprehensive HIA as a basic requirement for validation in order to capture potential impacts on designated and non-designated heritage assets in conformity with para. 194 of the NPPF 2021."</p> <p>Noted</p>
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	allow proposals to respond to any opportunities or constraints identified by this work, rather than becoming a tick box exercise.	
Natural England	This consultation relates solely to your Authority's Strategic Environmental Assessment (SEA) screening opinion. We concur with your conclusion that the implementation of the ABRO Development Brief Supplementary Planning Document is not likely to give rise to any significant environmental effects. We therefore agree with your conclusion that SEA would not be required in this case.	Confirms SEA screening opinion which will be updated
Environment Agency	We have reviewed the report dated October 2021 as submitted and can confirm that we do not disagree with the conclusion reached within the report. The SPD will not create new policy but will rather follow policy as outlined in the Local Plan. Due to this we agree that the SPD will not result in Environmental Harm. If however, a SEA is screened in, we would advised that contamination to groundwater should be reviewed with the SEA report.	Confirms SEA screening opinion which will be updated
NHS North East Essex Clinical Commissioning Group	<p>The CCG has several primary care facilities within a 2km radius of the ABRO site and these are listed in the table below. The surgeries are collectively under capacity and the proposed residential part of the development will definitely put more pressure on the services in the area. We currently don't know the strategies for the surgeries but we will be requesting S106 to mitigate the impact of the development.</p> <p>The CCG is aware of the level of development in Colchester and has begun discussions with the planners to explore possible strategies for health dealing with the development. The ABRO site will be included as part of this future work.</p> <p>The CCG would like to reiterate the importance of Health Impact Assessments (HIA's) and understanding health impacts in all developments but this is particularly critical in town centre developments where the physical estate can be constrained more than more rural locations. It might be useful to request an HIA for this development irrespective of the number of dwellings in the final masterplan and the CCG would be happy to discuss this matter further.</p> <p>DM2 Community Facilities – new development will be required to provide or contribute towards the provision of community facilities including education. Can we just confirm that health contributions are covered in this policy please?</p> <p>Development Framework Sustainability is key to the NHS as we aim to meet Carbon Net Zero and a huge amount of work is being done with local planners to make sure that new developments can be as environmentally friendly as possible.</p>	<p>Noted</p> <p>Noted</p> <p>Noted. It is likely that the number of dwellings proposed for the site will be in excess of the threshold of 100 which triggers the requirement for an HIA.</p> <p>DM2 includes health facilities.</p> <p>Noted</p>

	<p>Local open space is a key attribute in peoples physical and mental health so the CCG is glad to see that green space is a high priority for the site. As a CCG we have access to multiple service providers that might like to make innovative use of some of this space and we will be able to introduce them to the scheme when appropriate if you wish? The link between ill health and obesity with lack of exercise is well known and the easy access to green space where someone can walk quietly or jog is key to getting more people active.</p> <p>The CCG would like to reiterate that developments like this have more health impact than just primary care and our colleagues in NHS Trusts will continue to be consulted. As this process progresses the NHS Trusts will be more involved and this should hopefully provide you with much broader view of the health infrastructure needs and the impact of the development. The CCG would not have any issues supporting the ABRO Site Development Brief and looks forward to working with the local authorities and planners on this very exciting project.</p>	<p>Noted</p> <p>Noted</p>
Colchester Civic Society	<p>The Colchester Civic Society welcomes the ABRO site development brief, the next step in the regeneration of former Garrison land in Colchester.</p> <p>We appreciate that;</p> <ul style="list-style-type: none"> • Current open space and footpaths will be preserved • The existing Roman Circus Ancient Monument site will be protected and extended into the Abro site • Historic Buildings within the site will be retained and sympathetically converted for other purposes • The Artillery Folley will also be retained although it not clear if access through it will be provided. <p>The development and display of the Roman Circus site would be assisted with better access and signage.</p> <p>The Supplementary Document makes it clear that the ABRO site has not been properly investigated yet and that once trial excavations have been carried out, exact findings could change the future development of the site, as the extent and importance of any archaeological remains cannot be predicted.</p> <p>Housing is intended for much of the ABRO site but the exact form and extent will depend on the results of the investigations. For this reason, there no point in thoroughly examining the sample designs included in the Document at this stage, but these will need to be sympathetic to existing housing and other properties, both modern and nineteenth century. There needs to be landscaping and "barrack-like" structures should be avoided.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

	Apart from the Borough Council's potential interest in the Roman Circus and the results of archaeological investigations, other unknowns include a proposal for a Military Museum, possibly on or adjacent to the area, details of which are unclear.	Noted
Friends of Colchester Archaeological Trust	We support the Council's vision for the development of the ABRO site in the context that it recognises the outstanding historic importance of the Roman Circus whose preservation, public accessibility and interpretation need to be ensured, both in relation to other surviving remains of Colchester's historic importance and for local public benefit, as well as in the wider national and international interest.	Noted
	The ABRO site is likely to prove an important link, at present missing, in the major route for those walking from the town centre via Scheregate, Abbeygate Street and St. John's Green to the Roman Circus and the Roman Circus Centre. (Direction signs are needed.)	Noted
	We wish to stress the essential relationship of an interpretation centre (in this case the Roman Circus Centre) to the public understanding, enjoyment, education and tourist activity of archaeological remains like those of the Colchester Roman Circus.	Noted
	Townscape. Outside the old Garrison, a major historic feature that is lacking and should be mentioned in the document is the original Abbey Wall. Substantial sections survive around its whole circuit, which encompassed the grounds of St. John's Abbey. The longest and most highly visible section still stands marking the east side, alongside which Mersea Road runs from St Botolph's roundabout. Another section can be seen on the north side next to the Abbey Gate, while significant smaller portions still stand on the south and west sides. The Abbey Wall is a scheduled monument (SAM) and dates from the 12th century.	Noted
	Roman Circus Centre. The rear façade and approach to the Centre will come into greater focus with the development of the ABRO site and the sympathetically designed relationship of certain essential improvements and additions to the RCC should assessed at the outset to mutual advantage.	Noted
	These matters must be considered at the outset as stated. Any proposal for delay would immediately put the Roman Circus Centre's future viability in jeopardy.	Noted but ownership and cost will need to be considered
	Historic Buildings. The peripheral historic buildings could be used for appropriate purposes without any unnecessary alteration. For example, the infirmary stables (IC3) could house a 'Museum of Colchester's Military History' if a properly constituted and viable group of supporters were to be forthcoming. Likewise, another of these buildings could serve as a 'Museum of Engineering in Colchester' if its supporters were able to take on a lease. Both of these subjects are of constant local interest and, if properly organised, would add substantially to Colchester's tourist attraction.	Noted
	Landscape and Trees. Planting and maintenance of trees and other natural features, both inside and outside the scheduled area of the monument, should be	

	<p>undertaken with due care to ensure that good sight lines along the full length of the circus are provided so that public understanding of the circus's overall size can be properly appreciated.</p> <p>Planning Obligations. The financial contributions and other obligations as mentioned will materially help to ensure that the outline of the circus, its interpretation and public enjoyment serve as a unique focal point for the new development and Colchester as a whole. This includes the Roman Circus Centre as an integral element of this historic public facility.</p> <p>Conclusion. We believe that from recent experience the Council and its chosen associates would be entirely able to undertake the successful completion of the ABRO site development themselves in full accordance with the Brief's requirements (Cf. No. 60 Beverley Road).</p> <p>If CBC were to purchase and develop the site itself, this would send out a positive signal not only to show what is needed and can be done on such a site as this, but also as a strong mark of respect and intent for the future of Colchester's valuable historic past which is at the heart of the town's special identity and will put tourism, culture and the economy on an increasingly firmer basis for the future.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>
Colchester Cycling Campaign	<p>This document is substantially the same as our response to the previous ABRO consultation. Additions are in <i>italics</i>, and deletions are in strike through.</p> <p>Colchester Cycling Campaign welcomes aspects of the document [1] but requests that it unambiguously and fully complies with the Government's Local Transport Note 1/20 [2].</p> <p>i.e.</p> <p>1. The list of policies to consider should include LTN 1/20 [2] and the Essex Cycling Strategy [3], <i>the error (2.18 [1])</i>,</p> <p><i>"LTN 1 /2 /20", should be fixed, and LTN 1/20 needn't share a bullet with Manual for Streets 2</i></p> <p>2. We welcome the use of filtered permeability and home zones and we support the continuation of the Flagstaff Rd. filter.</p> <p>3. Several of the diagrams lump pedestrian and cycle routes together, with "& cycles" in parentheses, c.f. Figure 1. Cycles must be treated as vehicles and not as pedestrians (1.6.1.2 [2]) so any combined routes must be handled carefully. Cyclists should be happy to cycle in the road of suitably calmed streets (S7.5 [2])</p> <p>4. Car parking is discussed but cycle parking is only mentioned in passing.</p> <p>Secure cycle parking should be provided,</p>	<p>Noted</p> <p>Agree change incorporated</p> <p>Noted</p> <p>Noted</p>

	<p>c.f. 4.21 [1], in line with [2], e.g. with one space per bedroom. <i>NB space left over in garages or the cheapest available shed is rarely suitable. Cycle lockers and hangars are widely available [4] for home storage, as well as communal schemes [5]. 4.18 [1] mentions “model shift” which should probably be “modal shift”</i></p> <p>5. Notwithstanding the proximity to the Town Centre and travel hubs, significant gaps in cycle infrastructure hinder their accessibility from the site by bike. <i>It is stretch to say that “The area generally benefits from a good local cycle network” (3.18 [1]), however much worse it may be elsewhere in Colchester.</i> These gaps should be addressed, which include, but are not limited to: the Abbeygate St. underpass, the East-West cycle route along Southway, and St. Botolph’s Circus.</p> <p>(a) NB Given that an at grade crossing of Southway was specified in the Garrison masterplan, the underpass should be a high priority</p> <p>6. While the proposed renovation of Artillery Folley is welcomed, it is questionable whether it could ever be wide enough for use as a shared use path. Replacement of the steps at the Western end is clearly a pre-requisite. <i>If impossible, an alternative East-West route should be provided, c.f. 4.18 [1])</i></p> <p>7. Any improvements to the junction of Flagstaff Road and Circular Roads North and East, <i>as well as the site access (4.17 [1]),</i> should improve facilities for cyclists on what is an important junction in the cycle network. Improving cycle infrastructure will ease problems around vehicular access <i>and increased vehicular movements around Flagstaff Rd./ the access will increase pressure on existing, sub-LTN 1/20, cycling infrastructure</i></p> <p>8. Further mitigations of the constraints around access could include:</p> <p>(a) using both Flagstaff Road and Roman Circus Walk but preventing a through route with a modal filter</p> <p>(b) providing parking for St. John’s Green School at nearby car parks, e.g. Napier Road</p> <p>References</p> <p>[1] “ABRO site Development Brief SPD, Colchester,” tech. rep., CBC, October 2021.</p> <p>[2] WSP and Phil Jones Associates, Local Transport Note 1/20: Cycle Infrastructure Design. Department for Transport, July 2020.</p> <p>[3] Essex County Council, “Essex Cycling Strategy,” November 2016.</p> <p>[4] www.cyclehoop.com/.</p> <p>[5] Lambeth Borough Council: Cycle hangars—for residential use .</p>	<p>Agree add further reference to cycle parking and correct modal shift reference</p> <p>Noted – improvements will be determined through any planning application</p> <p>Agree change incorporated</p> <p>Noted</p> <p>Noted</p>
Local Residents	Various comments listed below	

	<p>There should first be a Geophysical survey of the whole site to see sites of archaeological interest. Then a plan to investigate these sites. The original buildings of the headquarters have been refurbished very well, and the surrounding area has been landscaped with sympathy to the Roman Circus. The new buildings also fit in well with the area. Any development on the new site should reflect and enhance that sympathy with landscaping and notice boards to inform on the circus. I also think it would be good to have signs, on the new development guiding people to the circus. This could be straight forward sign or inlaid chariot in the path</p>	Noted
	<p>Currently I have vehicle access and parking in my back garden. I am very pleased the Folley is being redeveloped but want to retain access as my partner has his workshop at the back of our house and requires access plus we are considering an electric car and feel this would be an available place to charge our car. Please can any plans ensure continued access.</p>	Noted
	<p>While overall the Draft Planning Document sets out a sensitive development strategy, to be in keeping with both historic buildings nearby that have already been converted into residential accommodation, as well as new buildings along Circular Road North, I believe the height of the new construction should be limited to no more than 3 stories. I also believe that any new residential construction should have a pitched or sloping roof, like that indicated in the picture of Accordia, Cambridge. While a lot of the new construction in the area near St Johns Green and the Officers Club includes apartment blocks with flat roofs, these look totally out of character with the Victorian former garrison buildings nearby. Thus even though they have used good materials, the development stands out like a 'sore thumb', and in my opinion is not sensitive to the area.</p>	<p>Noted. The more sensitive areas of the site are limited to 3 stories. There will be a need for any higher stories across the site to demonstrate that they do not have detrimental impact on the setting. Detailed design will be considered at the planning application stage.</p>
	<p>The site is indeed an absolutely crucial asset and should be at the very centre of efforts to enhance the town's heritage economy. However, I suggest below a number of aspects requiring modification:</p> <ul style="list-style-type: none"> - (3.13) The proposed 'Buffer Zone' around the Circus site is welcome, but a concern is that this could be open to challenge in the light of precedent. In the earlier development of the Arena Place site this principle did not apply: there is new building within ten metres of the Cavea on that site. The rationale for the buffer needs amplification in the SPD. - (3.17) The enhanced presentation and signposting of the site is greatly appreciated, but access to the site needs further consideration. A visitor attraction of national significance would clearly require not only additional coach and car parking space but easy access from Colchester Town station. In this regard, the proposed development of the St Botolph's Circus area by ECC is of great relevance and the Council should seek to ensure that these plans allow ready access to the new visitor attraction on foot from that station. 	<p>Noted</p> <p>Noted- The requirement included in the SPD can be applied to future proposals.</p> <p>Noted</p>

	<p>- (3.1) The intimation that the Council and the CAT would favour the establishment of a significant visitor attraction there, accompanying the proposed changes to the management of the Roman Circus, is especially welcome (see 3.1). I understand that the CAT once sought to acquire the Sergeant's Mess building for their own centre and to establish a military museum. Given the army's historical connection with the town, I believe this would now be an entirely suitable purpose for the important site.</p> <p>- (3.20) A concern relates to vehicle congestion, pollution, and road safety particularly on Flagstaff Road – if this were to be the sole point of entry to the new site. There is a particular issue because of the large number of children that use that route to get to the two schools. During school 'rush hour' periods (between @8.15 - 9.00 and @3 - 4.15), there is a substantial build-up of traffic on Flagstaff. Parents and children travel to and from the school on foot, in large numbers. Cars often block Flagstaff and the private road (Londinium, part of the Arena Place development, on land owned by Taylor Wimpey) and the car parking spaces of residents have been blocked or used by non - residents. There have been altercations with residents on the Arena Place development and, despite raising the issue with the School, a solution has yet to be found. Flagstaff should not be the single point of access.</p> <p>- (3.20) Further attention needs to be given to the effects of the proposed development on the wider transport network. There is a clear recognition that the proposed site is close to an AQMA (Mersea Road) in the SPD but a concern is that the flow of traffic from the proposed Middlewick site will exacerbate the problem. The joint effect of the proposed development of the ABRO site and Middlewick will need attention to control traffic flow, congestion, and pollution (3.16), to the south of the town centre. As a minimum requirement, all established trees on or proximate to the site must be protected, whether or not they are now subject to a preservation order.</p> <p>(4.9) The commitment to the enhancement of biodiversity on - site is most welcome. In this respect, I note that the car parking area to the north of the site was once green space and suggest strongly that it should now be returned to its former state (1.7). There is much wildlife in the area, including red listed birds, numerous foxes and Muntjacs. The importance of 'connecting' spaces for nature is often highlighted by Natural England - and the ABRO is clearly of value in this regard. In addition, the proximity of the area to two schools should be noted. The value here is in encouraging connection with nature among the young in a Town setting, again a theme often highlighted by RSPB and the leadership of Natural England as critical as recovery of nature.</p>	<p>Noted</p> <p>Noted all necessary Highways and Transport Assessments will be required to support any planning application and will consider these matters</p> <p>Noted</p> <p>Noted</p>
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