

Summary of Representations

Regulation 18 Consultation



Colchester
New Local Plan



Summary of Responses to the Regulation 18 Draft Local Plan Consultation

This document provides an officer summary of representations received during the Regulation 18 Draft Colchester Local Plan Consultation, which ran from **26 November 2025 to 14 January 2026**. The summary outlines overall levels of engagement and the key issues raised but does not capture every individual comment. **It is important to note this is an initial high-level summary intended to capture some of the main issues raised and common themes. It does not seek to cover everything, so some points made to the consultation may not be referenced.** A total of 3,331 representations were submitted by 1,222 respondents. Full representations are available [here](#). It is not necessary to register to view the responses.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy	Summary of issues raised in representations
Introduction	<ul style="list-style-type: none"> • Concerns that proposed growth exceeds the capacity of existing infrastructure, including transport, utilities, healthcare, education and emergency access, with several respondents noting outdated or incomplete evidence bases supporting the Plan. • Objections that development in rural and island locations would worsen traffic, encourage rat-running, and increase car dependency where public transport is already limited. • Opposition to specific site allocations logged to the introduction, particularly in Langham, Messing, Mersea Island and the Colne Valley (other sites referenced against other Policies) - on grounds of scale, landscape harm, settlement character impacts, flood risk, inadequate services and insufficient mitigation. • Concerns that environmental, heritage and agricultural land impacts are underestimated, including loss of high value landscapes, ancient woodland, productive farmland and historic buildings. • Criticism of consultation processes, with comments highlighting digital exclusion, difficulty navigating documents, and perceptions that residents were engaged too late. • Requests for clearer policy wording, better structured documentation, updated transport modelling, and alignment with emerging national policy and potential local government reorganisation. • Calls for equitable distribution of growth across the city to avoid disproportionate impacts on particular communities. • Additional technical comments from statutory bodies, including MOD safeguarding requirements, Natural England’s recommendations on HRA updates, and the Environment Agency’s advice on cemetery provision.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

<p>Vision and Approach to Plan</p>	<ul style="list-style-type: none">• Broad support for the Local Plan’s overarching vision, particularly its ambition to create sustainable, inclusive communities and embed health, wellbeing, climate action and nature recovery at the heart of growth.• Strong support for the Plan’s aspiration to preserve Colchester’s identity and improve residents’ quality of life, alongside concern that large-scale allocations may undermine these aims where growth is not proportionate to settlement character.• Concerns that the Vision is too vague and lacks clarity on how major growth will be mitigated, delivered and phased, especially in areas facing long-standing infrastructure constraints.• Repeated comments that the Vision must more clearly acknowledge the scale of housing need and explicitly commit to meeting development requirements in full, including affordable housing.• Requests for the Vision to better reflect local challenges such as water supply, wastewater capacity, transport limitations, and environmental pressures, to ensure the approach is realistic and achievable.• Support for directing growth to sustainable, least constrained locations, though concern is raised that some allocations were selected before the infrastructure audit was complete.• Calls for a stronger emphasis on partnership working between the Council, developers, service providers, and key stakeholders to deliver the Vision on the ground.• Suggestions for strengthening the Vision by recognising specific sector needs, including health infrastructure, social care provision and accommodation needs of defence and essential workers.• Comments that the Vision should emphasise the importance of maintaining a five-year housing land supply and ensuring delivery risk is actively managed to maintain a flexible and resilient supply of sites.
------------------------------------	---

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Support for the Plan’s ambition to create a greener, healthier city with well connected green networks, open spaces and active travel routes, although respondents stress the need for clearer delivery mechanisms. • Some comments that parts of the Vision appear overly aspirational, lacking detail on prioritisation, delivery pathways, phasing, and the realistic challenges of infrastructure provision. • Concerns that the Vision does not sufficiently reflect environmental limits, especially where growth pressures intersect with biodiversity, ancient woodland, water quality, or nature recovery priorities. • Respondents highlight the need for the Vision to integrate more fully with Neighbourhood Plans, ensuring local identity and community-led objectives are respected and not overridden by strategic allocations. • Calls for the Plan to better recognise the scale of change required to accommodate significant housing growth, particularly in parts of the district that have experienced very limited development over recent decades. • Some respondents support the Vision’s intention to move away from piecemeal development and towards coordinated, masterplanned growth, but stress that this must be backed by credible, costed, and deliverable infrastructure commitments.
Strategic Policies		
ST1	Health and Wellbeing	<ul style="list-style-type: none"> • Support for health and wellbeing as a strategic theme and the policy’s ambition but concern about some parts of its deliverability. • Concerns that existing healthcare capacity (GPs, dentists, hospitals) is already stretched and that the Plan does not demonstrate how additional capacity will be delivered alongside growth. • Doubts about deliverability of active and sustainable travel objectives where traffic levels are high and public transport is limited, particularly in village locations.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Objections that the impacts of additional homes on the health and wellbeing of existing communities, including worsening air quality, physical and mental wellbeing and loss of green space, are insufficiently addressed. • Mixed views on Health Impact Assessments, with support in principle but concerns over proportionality and justification of 50 dwelling threshold. • Comments and suggestions from Essex County Council to strengthen the policy wording in relation to implementation of Health Impact Assessments.
ST2	Environment, Green Network and Waterways	<ul style="list-style-type: none"> • Support for ambitions on nature recovery, biodiversity and green infrastructure. • Concerns how this policy will be implemented. • Combination of support and objections to the strategic biodiversity areas. • Concerns that some housing allocations conflict with the policy's objectives, particularly where development adjoins sensitive habitats or strategic biodiversity areas. • Requests for clearer, evidence-led application of strategic biodiversity designations and avoidance of unnecessary overlap with other designations. • Significant concern about water quality, wastewater capacity and cumulative impacts, especially in coastal and estuarine locations. • Calls for proportionate and practical requirements for Green Network and Waterways Plans to avoid duplication and viability impacts. • Comment from ECC to consider reference to the application of the Urban Greening Factor (UFG) in the policy.
ST3	Spatial Strategy	<ul style="list-style-type: none"> • Some support for directing growth to the most sustainable and accessible locations. • Calls for brownfield sites to be used first. • Widespread objections to the scale of growth proposed in some villages considered disproportionate to their size, role and infrastructure capacity.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Some objectors consider there is no rationale to support the reference to appropriate level of growth and housing distribution does not reflect position in hierarchy, • Some concerns that the settlement hierarchy is applied too rigidly and does not adequately reflect infrastructure constraints or delivery risk. • Objections that infrastructure evidence and cumulative impacts have not sufficiently informed the distribution of growth. • Suggestion that settlement hierarchy should be a guiding framework rather than absolute constraint. • Request that it should be recognised that not all settlements within same tier will be equally sustainable. • Concerns over viability methodology underpinning the spatial strategy. • Some comments that plan period to 2041 does not align with NPPF requirement.
ST4	Development in the Countryside	<ul style="list-style-type: none"> • Support for the principle of protecting countryside character and preventing coalescence. • Concerns that the policy lacks clarity and provides inadequate protection to villages and rural areas from speculative development outside settlement boundaries. • Objections that some proposed allocations undermine countryside protection and are difficult to justify in view of this policy. • Calls to strengthen safeguards for landscape character, rural character and infrastructure capacity. • Requests for a clearer, criteria-based approach balancing protection with identified development needs. • Request for policy to allow proportionate development that supports the needs, vitality and sustainability of rural communities. • Request that the policy references the delivery of utility services/infrastructure in the countryside.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> Request that policy wording ensures that development will avoid best and most versatile agricultural land where possible.
ST5	Colchester's Housing Need	<ul style="list-style-type: none"> Acknowledgement of the need to plan positively for housing growth. Concerns that housing numbers and distribution are not sufficiently justified by infrastructure and delivery evidence. Objections to reliance on large strategic sites and windfalls, with fears this may undermine effective delivery. Calls for additional flexibility, buffers and smaller sites to improve resilience and early delivery. Concerns about impacts of housing growth on transport, utilities, health services and village character. Concerns about housing affordability. Comments about specific Place policies and suggestions for alternative housing sites. Housing numbers and plan period questioned. Additional sites have been put forward for residential development submitted for consideration, some of which were previously assessed through the SLAA and 17 which are new or suggest amendments to previous site submissions.
ST6	Colchester's Employment Needs	<ul style="list-style-type: none"> Support for providing employment land to support economic growth Questions over whether the quantum and type of employment land reflects future economic trends and local job creation. Clarity sought over employment land figures and any carry over from adopted Plan. Requests for greater flexibility to allow mixed-use and modern employment patterns. Concerns that employment growth assumptions are not sufficiently linked to housing growth and infrastructure capacity. Comments noting that allocating employment land doesn't generate jobs.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Some requests for additional employment land to support other settlements and rural area. • Suggestion that the policy adds sui generis uses to the policy in considering suitable alternative uses. • Additional employment land submitted for consideration some of which were previously assessed through the SLAA and a number which are new or suggest amendments to previous site submissions.
ST7	Infrastructure Delivery and Impact Mitigation	<ul style="list-style-type: none"> • Many reps stated that growth must be infrastructure-led. • Significant concern that infrastructure funding, phasing and delivery mechanisms are insufficiently defined. • Objections on the basis that past experience shows infrastructure often lags behind development and lack of confidence in future delivery to support growth. • Particular concern about transport capacity, wastewater, water supply and healthcare provision, including the need for additional hospital beds. • Calls for clearer site-specific infrastructure requirements, viability and certainty before development proceeds. Also call for infrastructure to relate to parcels of land where more than one makes up an allocation. • Policies strengthened to prioritise sites that are not dependent on major infrastructure upgrades or more complex phasing. • Concerns about over reliance on sustainable modes of transport such as rapid Transit and the viability of achieving modal shift for existing and new residents. • Significant concerns raised about the Strategic Road Network capacity, including A12 and A120 and a number of A12 junctions. Satisfactory mitigation will be required to support growth proposed to manage the impacts. National Highways raise specific concerns regarding existing capacity and are committed to continue to work with CCC and the Highway Authority as the plan progresses.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Suggest adopting a proportionate regulatory approach that supports medium sized builders and recognises their contribution to housing delivery. • Strategic Infrastructure should include Green Infrastructure and delivery of the Local Nature Recovery Strategy. • A number of reps to this policy comment and challenge the Newmark Viability evidence for the whole Plan Viability (October 2025).
ST8	Place Shaping Principles	<ul style="list-style-type: none"> • Mixed levels of support for the ambition to create high quality, well designed places with strong local identity. • Concerns about how effectively the place shaping principles will be implemented. • Repeated objections that some proposed developments fail to respect local character, landscape setting and village identity. • Fears that large strategic sites will erode distinctiveness and lead to the loss of established sense of place. • Requests for clearer and more consistent wording so that the policy is easier to apply and avoids duplication with national design guidance. • Developers and agents seek greater flexibility in how place shaping requirements, such as design codes or masterplans, are used especially for smaller or nonstrategic sites. • Some concerns that the policy includes too many criteria, making it unclear how applicants should demonstrate compliance. • Calls for stronger integration of Green Infrastructure (GI) within place shaping, with suggestions to align ST8 more fully with the Essex GI Standards and Building with Nature benchmarking. • Recommendations to reference the Essex Design Guide directly within ST8 so it becomes a material consideration, strengthening consistency in design quality expectations.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Suggestions to reinforce ST8 with clearer requirements for climate mitigation. • Requests for the policy to explicitly encourage opportunities for renewable energy.
ST9	The Tendring Colchester Borders Garden Community	<ul style="list-style-type: none"> • Support in principle for a comprehensive, plan-led approach. • Concerns about delivery timescales, infrastructure provision and reliance on long-term assumptions. • Requests for clarity on how and when the Garden Community will contribute to housing supply. • Concerns about coalescence. • Concerns about delivery of the link road. • Site promoter has suggested modifications to policy to align with adopted DPD.
Environment		
EN1	Nature Conservation Designated Sites	<ul style="list-style-type: none"> • Broad support for the objective of protecting designated nature conservation sites, including SACs, SPAs, SSSIs, Ramsar sites and Marine Conservation Zones. • Concerns that the draft Plan does not adequately demonstrate no adverse effect on the integrity of designated sites, particularly in relation to cumulative impacts. • Repeated objections regarding the absence of a comprehensive assessment of wastewater and sewerage impacts, especially on coastal and estuarine environments. • Concerns that Marine Conservation Zones are not explicitly referenced or assessed within the policy. • Objections highlighting inconsistencies between Policy EN1 and some proposed site allocations, including allocations adjacent to sensitive designated sites. • Calls for clearer alignment between EN1 and other policies to ensure effective avoidance and mitigation of recreational and environmental impacts. • Mixed views on policy rigidity, with some respondents seeking greater flexibility and others favouring strong, unequivocal protection.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Support for recognising the importance of Local Wildlife Sites and ecological connectivity, beyond statutory designations alone. • Comments requesting clearer justification, evidence and policy wording to ensure compliance with national policy and legal requirements.
EN2	Biodiversity Net Gain (BNG) and Environmental Net Gain	<ul style="list-style-type: none"> • Broad support for embedding biodiversity net gain. • Requests for clarity on deliverability, viability and long-term management of BNG, particularly for off-site BNG • Concerns about duplication and conflict with national policy, particularly around exemptions and flexibility in delivering BNG • Concern about pointing developers towards 'preferred' off-site BNG sites and that Council could facilitate a greater off-site BNG market. • Suggestion at the strategic green field sites should seek a higher BNG target – Essex County Council evidence supports 15-20% which is suggested as being viable and appropriate on those sites in the Plan.
EN3	Biodiversity and Geodiversity	<ul style="list-style-type: none"> • Support for protection and enhancement of biodiversity assets. • Concerns about consistency between policy objectives and some site allocations. • Comments that independent ecological surveys are required at the appropriate time of year. • Suggestions to reference the requirement to incorporate features supporting priority and threatened species and strengthen climate adaptation provisions. • Concerns the policy is overly detailed, inflexible and repetitive of national legislation and guidance. • Additional Policy wording requirements relating the a BNG Plan and a 30-year Habitat Management and Monitoring Plan are requested.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
EN4	Irreplaceable Habitats	<ul style="list-style-type: none"> • Strong support for protecting irreplaceable habitats such as ancient woodland. • Objections where allocations are perceived to threaten irreplaceable habitats or their buffers. • Concern the buffer zone for ancient woodland is too low.
EN5	New and Existing Trees	<ul style="list-style-type: none"> • General support for tree protection and planting. • Requests for clearer expectations on retention, replacement and long-term management. • Suggestion that policies EN5 and GN4 are combined and avoid duplication of technical standards.
EN6	Conserving and Enhancing the Historic Environment	<ul style="list-style-type: none"> • General support for the principle of policy, though often accompanied by concerns about implementation and alignment with national policy. • Calls for stronger protection of historic buildings, including proposals for Traditional Architecture Design Codes, restrictions on the demolition of pre-1950 buildings, and enhanced safeguarding of listed and non-designated heritage assets. • Requests from statutory bodies, including Historic England, to ensure the policy fully aligns with the NPPF, particularly regarding the tests for substantial harm or total loss of significance. • Objections suggesting that the scale and nature of some allocations could adversely affect historic environments, landscapes and long established settlement patterns. • Comments emphasising the need for archaeological sensitivity, including protection of Roman mosaics and appropriate treatment of archaeological features. • Identification of historic landscapes and ancient woodlands (Bullock Wood SSSI) as heritage assets whose setting should be protected, alongside built heritage. • Requests for a more proportionate and tiered engagement process, ensuring heritage significance is assessed by qualified professionals.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> Concerns that aspects of the policy are overly onerous and may exceed or duplicate national policy requirements, with recommendations to streamline wording and ensure consistency with forthcoming national development management policies.
EN7	Archaeology	<ul style="list-style-type: none"> Calls for stronger protection of archaeological assets, with respondents emphasising the need to retain and integrate features such as Roman mosaics within new development rather than removing them. Requests that archaeological investigation and mitigation be undertaken by qualified, professional specialists. Concerns that development in historically sensitive areas could harm archaeological landscapes linked to long-standing heritage and settlement patterns. Recognition that archaeological value extends beyond built form, including the need to protect the historic character of ancient woodland (Bullock Wood SSSI) and historic landscapes that contribute to archaeological context. Suggestions that the policy should ensure proportional, evidence based assessment, avoiding unnecessary burdens for minor schemes while ensuring sufficient investigation for major or complex sites. Concerns that the Local Plan must align with national policy (NPPF) to ensure consistent treatment of archaeological significance and appropriate tests for harm or loss.
EN8	Flood Risk and Sustainable Drainage Systems (SuDS)	<ul style="list-style-type: none"> Repeated concern about flood risk, drainage and sewerage capacity worsening as a result of building more developments and climate change Support for policy wording in relation to SuDS, but encouraged that two separate policies should be created to separate out flood risk and SuDS Calls for stronger policy wording that ensures development must be flood resistant and resilient, aligns with NPPF and is not overly onerous.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> Some concerns about deliverability and maintenance of SuDS.
EN9	Pollution and Contaminated Land	<ul style="list-style-type: none"> Support policy for managing pollution risk but consider wording in parts could be strengthened to ensure compliance. Request policy provides information on impacts that new development can have on sensitive uses such as residential sites in line with 'agent of change' principle. Suggestion to include more information on managing impacts of air quality on the natural environment. Policy could explicitly address how developing on brownfield land helps remediate and prevent ongoing contamination.
Green Network and Waterways		
GN1	Open Space and Green Network and Waterways Principles	<ul style="list-style-type: none"> Support for a connected green network. Justification required for 10% of gross site area as a multifunctional open space. Policy is overly prescriptive and lacks flexibility, particularly for small development. Suggestions to improve policy, e.g. by referring to incorporating features supporting priority and threatened species, designing open spaces so that they support physical activity and adding reference to flood risk. Reference to the Urban green factor is suggested to improve the policy wording.
GN2	Strategic Green Spaces and Nature Recovery	<ul style="list-style-type: none"> Strong support for nature recovery ambitions. Support for the Roman River corridor as a specific nature recovery area. Concerns about conflicts with development. Essex Wildlife Trust recommend incorporating the 30x30 target. Natural England and the Environment Agency support reference to the LNRS but suggest further work to enable the implementation of the LNRS.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Suggested that the policy could reference the statutory net gain metric uplift in areas of strategic significance, incentivising habitat creation in priority areas.
GN3	Local Green Spaces	<ul style="list-style-type: none"> • Support for designation of valued local green spaces in principle some site specific comments. • Queries about the status of local green spaces in neighbourhood plans.
GN4	Tree Canopy Cover	<ul style="list-style-type: none"> • Support for increasing canopy cover. • Suggestion that policies EN5 and GN4 are combined and avoid duplication of technical standards. • Policy is inflexible. • Suggestions to include a more ambitious target such as 20%.
GN5	Suitable Alternative Natural Greenspace	<ul style="list-style-type: none"> • Recognition of the importance of mitigating recreational impacts. • Flexibility requested in the application of 8 hectares of alternative greenspace per 1000 head of population. • Concern about using sites on Mersea Island as a SANG resource for off-island development.
GN6	Retention of Open Space	<ul style="list-style-type: none"> • Support for protecting existing open space. • Request from some landowners to remove open space designation. • Queries about the status of local green spaces in neighbourhood plans.
Landscape and Coast		
LC1	Landscape	<ul style="list-style-type: none"> • Support for the objective of protecting and enhancing landscape character, tranquillity, rural openness and local distinctiveness.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Policy wording is seen by some as too broad or vague, particularly criteria (a), (b) and (c), with insufficient clarity on how impacts will be assessed or measured. • Repeated objections that specific allocations (notably PP23 Dawes Lane, Mersea Island, and Langham) conflict with LC1. • Mixed views on LIVA • Repeated comments expressing concern about development on high-grade agricultural land (Grades 1, 2 and 3a) requests to prohibit development on Grade 1 land. • Calls for corrections to Landscape Character Assessment (LCA) ratings where perceived inaccuracies exist. • Amend criteria to explicitly include lighting impacts
LC2	Dedham Vale National Landscape	<ul style="list-style-type: none"> • Support for applying strict controls to development both within and adjacent to the National Landscape, including impacts outside the designated boundary. • Objections to large-scale housing proposals (notably at Langham and Boxted) close to the Dedham Vale and development of this scale is incompatible with the policy and LN designation. • Support for the policy’s reference to the Lighting Design Guide 2023 and dark skies protection and concern that proposed developments would conflict with this. • Objections that Policy LC2 does not sufficiently address cumulative impacts, particularly from multiple developments around the National Landscape. • Requests for amendments to improve clarity and robustness of policy criteria, particularly criteria (a), (b), (d) and (e). • Support for clearer alignment with The Dedham Vale National Landscape and Stour Valley Management Plan.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
LC3	Coastal Areas	<ul style="list-style-type: none"> • Emphasis on the coast’s natural beauty, tranquility, ecological value and recreational importance, particularly around West Mersea and the Blackwater estuary. • Arguments that the absence of detailed assessment means the policy does not fully align with NPPF flood risk and coastal change requirements. • Requests for alignment with the South Suffolk and Essex Shoreline Management Plan. • Significant concern about the impacts of wastewater, nutrient loading and pollution • Objections that warnings and evidence from statutory bodies (e.g. Natural England and the Food Standards Agency) are not adequately reflected or addressed in the policy. • Calls for more detailed and specific policy requirements for houseboats, particularly in West Mersea. • Calls for Policy LC3 to: • More explicitly address cumulative impacts. • Clearly set out assessment requirements for coastal change, flood risk, wastewater and habitat impacts. • Strengthen links to national policy, Shoreline Management Plans and coastal change guidance.
Net Zero Homes and Buildings, Renewable Energy and Water		
NZ1	Net Zero Carbon Development (in operation)	<ul style="list-style-type: none"> • Support for ambitions of reducing emissions • Concern about policy being onerous, too expensive to enforce impacting development viability and not being aligned with national policy. • Should rely on building regulations and Future Homes Standard instead • Suggestion that the policy should be updated to reflect the latest model policy in the Essex Design guide supported by evidence from the Essex Climate Unit. This will provide greater clarity and align with evidence.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
NZ2	Net Zero Carbon Development (embodied carbon)	<ul style="list-style-type: none"> • Support in principle and recognition that the approach is consistent with the rest of Greater Essex. • Concern that policy delivery will be difficult and will impact on housing delivery • Request made for clearer methodology • Suggestion that the policy should be updated to reflect the latest model policy in the Essex Design guide supported by evidence from the Essex Climate Unit. This will provide greater clarity and align with evidence.
NZ3	Wastewater and Water Supply	<ul style="list-style-type: none"> • Major concern about existing capacity of water and wastewater infrastructure to take new development • Concern that wastewater infrastructure will not be sufficiently upgraded before development takes places, and requests for safeguards to ensure people and environment are protected. • Mixed opinions on water use limits for new residential properties. Concern about how they will be delivered in practice. Suggestion to include water usage standards that align with BREEAM for non-residential.
NZ4	Renewable Energy	<ul style="list-style-type: none"> • Support for increasing renewable energy generation • Concerns about impact of allowing solar panels on Best and Most Versatile (BMV) farmland • Additional wording recommended to ensure all schemes benefit host communities.
Homes		
H1	Housing Mix	<ul style="list-style-type: none"> • Support for balanced housing mix. • Calls for local housing need and up to date evidence to be taken into account. • Mixed views on approach to housing mix with some respondents seeking greater flexibility in approach.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Concern that policies may not deliver homes affordable to local people.
H2	Affordable Housing	<ul style="list-style-type: none"> • Support for affordable housing delivery. • Concerns about ensuring local needs are met. • Request for policy to reference other specific types and tenure of housing, and alignment with NPPF 2024. • Mixed comments on flexibility with some welcome of flexibility and some request for policy to be more flexible. • Some concern regarding viability assessment. • Approach to affordable housing policy in rural areas questioned.
H3	Student Accommodation	<ul style="list-style-type: none"> • General support in principle • Request that security and safety are considered as part of management practices. • Concern over how need is assessed.
H4	Houses in Multiple Occupation (HMOs)	<ul style="list-style-type: none"> • The NHS raised concerns that HMOs generate lower Section 106 contributions than conventional residential developments. This makes it difficult to secure adequate health mitigation, despite the increased population associated with HMO growth • Objections linking HMO growth to wider environmental pressures, stretched infrastructure and antisocial behaviour. • To ensure HMOs are designed to be safe and secure, it is strongly advised that developers engage with the DOCO at the earliest stage of all future applications. • View that existing legislation (e.g. Awaab’s Law) already addresses serious management and maintenance issues and additional requirements would have negative effects and reduced housing choice.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
H5	Specialist Housing including Housing for an Aging Population	<ul style="list-style-type: none"> • Support for policy but there is insufficient certainty that it will actually be delivered through current site allocations. • Objections that some proposed allocations (e.g. PP17, PP29) do not clearly demonstrate how housing for an ageing population will be provided • The NHS supported joint working to identify locations better suited to specialist accommodation to mitigate impacts on Primary Care Networks. • Repeated calls for a better balance between: <ul style="list-style-type: none"> • Clear targets and certainty. • Flexibility on location, scale and design. • Alignment with health, accessibility and demographic evidence. • Concerns regarding affordability • Representations highlighted that Policy H5 should go beyond older persons' housing to better reflect neurodiversity and a wider range of specialist needs.
H6	Self and Custom Build	<ul style="list-style-type: none"> • Repeated objections from developers and industry bodies that the 2% requirement on sites of 150+ dwellings is not robustly justified by the evidence base. • Objections from some developers that Policy H6, as drafted risks being ineffective. • Requests for greater flexibility, including: <ul style="list-style-type: none"> • Site-by-site assessment rather than fixed percentages. • Identification of specific sites suitable for self/custom build. • Support for delivery through smaller developments and windfall sites. • Emergency services highlighted the importance of security and safety by design, with encouragement to apply Secured by Design principles at the earliest stage.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
H7	Gypsies, Travellers and Travelling Showpeople	<ul style="list-style-type: none"> • Support for planned provision but must be in suitable locations. • Infrastructure, health access and environmental capacity are critical issues • Concerns about deliverability and reliance on strategic sites.
H8	Rural Workers Dwellings	<ul style="list-style-type: none"> • Requested further information on definition of a 'rural worker' • Clarity over whether permanent dwellings can be built immediately if functional need shown • Clarify criteria for what determines an 'available dwelling' when assessing against policy criteria e for permanent rural workers dwellings
Economy		
E1	Protection of Employment	<ul style="list-style-type: none"> • Some support for safeguarding employment land • Recommendation that policy should include best practice guidance on providing evidence to justify and support the release of employment uses. • Concern that employment does not support growing population and a number of objections/comments relating to infrastructure (transport) capacity. • Concern policy will hinder re-use of brownfield land for housing. • Some specific comments on the details of the policy including need for logistics sites; protecting economy, tourism and cultural heritage; impact on small businesses; and impact of change of use to housing. • Suggestion that policy should also allow for associated Sui Generis uses.
E2	Economic Development in Rural Areas and Countryside	<ul style="list-style-type: none"> • General support for rural economic growth, particularly where it safeguards local jobs, supports farm diversification, and reduces the need to travel long distances for employment • Preference for reuse of existing buildings and brownfield-type sites, including redundant farm buildings, before permitting new build development in the countryside

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Need to protect existing rural employment uses, with support for retaining and repurposing established rural sites (including mineral and mixed-use sites) to maintain economic resilience. • Concerns about environmental impacts, particularly pollution, wastewater and nutrient loading affecting sensitive habitats, coastal economies and protected sites. • Requests for clearer policy wording and evidence requirements, including demonstration of business need, lack of suitable alternatives, and clarity on when replacement or new buildings are acceptable. • Transport accessibility and safety highlighted as a constraint, with concerns that rural employment sites may be poorly served by public transport, walking and cycling, increasing car dependency.
E3	Agricultural Development and Diversification	<ul style="list-style-type: none"> • Broad support for diversification to sustain farms and rural enterprise, provided proposals respect environmental and landscape constraints. • Concerns that E3 is overly prescriptive and may discourage diversification by adding unnecessary planning complexity and cost. • Argument that national policy already supports agricultural diversification, questioning whether E3 is required at all. • Concern about pollution and wastewater impacts on MCZs oyster beds and aquaculture, undermining biodiversity net gain and rural livelihoods. • Perceived inconsistency in protecting Grade 1 and 2 farmland under E3 but not across residential or other development policies. • Risk that restrictive policy wording could undermine the viability of farm businesses seeking to diversify or reuse existing buildings.
E4	Retail and Centres	<ul style="list-style-type: none"> • Support for policy approach to allocation of centres • Concerns about impact of out-of-centre development on city centre vitality

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Suggestion that the Policy incorporates urban greening principles
E5	Colchester Zoo	<ul style="list-style-type: none"> • General support for the policy • Request policy be made simpler by removing duplication of wording with other policies in the plan • Area of site allocation for zoo should be updated to align with zoo ownership boundaries. • Request clarity in criteria wording to ensure minor development does not have to comply with requirements that may be disproportionate (e.g. highway upgrades, wintering bird surveys) • Request that policy wording regarding the Essex Minerals Local Plan be strengthened.
Community and Social Infrastructure		
CS1	Retention of Community Facilities	<ul style="list-style-type: none"> • Support for the policy approach. • Concerns about loss of valued local facilities. • Some clarity requested in relation to definition of community facilities and criteria in policy.
CS2	Enhancement of and Provision for Community Facilities	<ul style="list-style-type: none"> • Support for new provision alongside growth. • Concerns about funding and timely delivery in line with planned growth. • Request for additional wording to ensure all new community facilities are safely accessed by sustainable modes.
CS3	Education Provision	<ul style="list-style-type: none"> • Significant concern about capacity of schools. • Concerns about funding and timely delivery. • Concerns over additional travel required to access schools. • Request for clarity in criteria, and alignment with NPPF. • Request for clearer planning and phasing.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Additional wording suggested to ensure all new community facilities are safely accessed by sustainable modes. • Commitment from Essex County Council to work with CCC to ensure adequate provision for education is secured to mitigate the impacts of the growth. Some key areas identified to confirm solutions for education provision.
CS4	Sports Provision	<ul style="list-style-type: none"> • There is clear support for the overall aims of the policy in protecting and enhancing sports provision. • Stakeholders request a strengthened, evidence-led policy that clearly sets out responsibilities, funding mechanisms, and the range of sports to be supported, while ensuring facilities are safe, inclusive, and appropriately located. Some concerns about deliverability, fairness, geographic equity, and clarity. • Concerns About Infrastructure Delivery and Funding – Many representations question how education, healthcare and community sports facilities (CS1–CS4) will keep pace with growth, calling for clearer commitments and funding mechanisms. <ul style="list-style-type: none"> • Calls for Development Contributions and a Possible Community Infrastructure Levy (CIL) – Some respondents highlight the £19m sports infrastructure gap and argue all new development should contribute through mechanisms like a S106/CIL. • Responsibility for Sports Needs Assessments – Developers and the House Builders Federation argue that the Local Plan—not individual planning applications—should determine sports needs to ensure transparency and viability. • Concerns About Over-Burdening Residential Schemes – Objections state that CS4 places disproportionate and unjustified requirements on residential (including smaller) developments.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Local vs Strategic Role of Sports Facilities – Some town and parish councils stress that local facilities (e.g. The Glebe) are not intended to serve wider city-level need, and local constraints such as access must be respected. • Need for Better Geographic and Evidence-Led Planning – Representations call for addressing spatial imbalances (e.g., shortages in southern Colchester), updating unmet demand calculations, and ensuring settlement boundaries align with sports facility locations. • Wider Scope of Sports Provision Requested – Stakeholders ask the policy to cover indoor facilities, emerging sports (padel, yoga, Pilates, CrossFit), and make clear the policy extends beyond outdoor playing fields. • Design, Safety, Inclusion and Practical Requirements – Comments emphasise safe and inclusive design (e.g. Make Space for Girls), crime-prevention measures, and practical needs such as space for emergency helicopter access. • Requests for Clearer Policy Wording and Stronger Delivery Commitments – Comments request more explicit commitments, clearer guidance on calculating financial contributions, inclusion of key partners such as Active Essex, and balanced proportionality for different development scales.
CS5	Tourism, Leisure, Arts, Culture and Heritage	<ul style="list-style-type: none"> • General support for safeguarding and promoting tourism, leisure, cultural and heritage assets as key contributors to Colchester’s economy and identity. • Calls for stronger protection of listed and non-designated heritage assets and limits on demolition. • Concern that tourism and aquaculture assets (oyster beds, bathing waters) could be irreversibly harmed by development and pollution. • Requests for full cumulative assessment and mitigation of wastewater and CSO impacts affecting tourism assets.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Objections that CS5 is overly rigid and may inhibit sustainable tourism and leisure development. • Requests to refine wording to ensure compliance with national policy tests of clarity and justification. • Need for early engagement on safety, inclusive design and counter-terrorism measures for visitor facilities.
CS6	Caravan Parks	<ul style="list-style-type: none"> • There should be a specific policy for Mersea Island. • Modification suggested by Environment Agency in relation to flood risk. • Support from Natural England and Anglian Water Services.
Place and Connectivity		
PC1	Healthier Food Environments	<ul style="list-style-type: none"> • Several respondents expressed overall support and its aims to promote healthier food environments. • Support the creation of new allotments (with suitable parking) was highlighted and new open spaces in association with development, noting continued high demand and benefits to new communities. • A comment around clarification on the policy of wording, although support is given a request that the opening sentence be amended to clarify that safeguarding does not refer to commercial crops. They propose revised wording to make this explicit. • East Suffolk & North Essex NHS Trust (via ECC Public Health) welcomes and supports the inclusion of the policy, highlighting its alignment with NPPF Paragraph 97 in managing hot food takeaways. Suggested policy wording refinements have been provided. • An objection to the policy on the grounds that the site proposal at Langham does not include allotments or a shared orchard, which they consider necessary for community growing and local sustainability.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> Essex County Council suggest some wording changes to reflect the latest national PPG guidance and provide clarity and strengthen the policy.
PC2	Active and Sustainable Travel	<ul style="list-style-type: none"> Support in principle for active travel aims but concerns about deliverability. Policy should align with other plans and guidance (such as LTP4, LCWIP) and NPPF. Concerns about modal shift targets, repeated comments that they are over ambitious. Concerns about existing congestion, unsafe walking and cycling routes, insufficient bus services and impact on existing infrastructure. Concern about lack of reference to Public Rights of Way. Some suggestions for specific improvements to routes and infrastructure. Some concern policy overlaps with other policies, and clarity required. A 33.6-mile circular cycling route is proposed linking many villages around Colchester via country lanes, existing cycle paths, and bridleways. Suggested wording to strengthen policy specifically with reference to school frontages and safe access to schools.
PC3	Parking Standards	<ul style="list-style-type: none"> Mixed views on the adequacy of parking standards and adequacy of parking in new developments. Concerns about access to Park and Ride sites. Additional wording suggested in relation to Electric Vehicle charging provision. Suggestion that soft landscaping is encouraged to deliver multifunctional benefits.
PC4	Development Density	<ul style="list-style-type: none"> Concerns that the policy promotes higher densities without sufficient regard to local character, settlement form, or semi-rural contexts, risking overdevelopment in some areas. Repeated objections that higher densities may exacerbate existing infrastructure pressures.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy	Summary of issues raised in representations
	<ul style="list-style-type: none"> • Calls for clearer thresholds, safeguards and proportionality, including differentiated density expectations for urban, edge of settlement and rural locations. • Suggestions that the policy should promote higher densities around transport hubs and sustainable transport corridors, in line with the updated NPPF and modal shift objectives. • Several respondents argue that density policy must be supported by robust viability evidence, noting inconsistencies in assumed densities. • Concerns that elements of PC4 lack clarity, particularly around how density interacts with other land-take policies such as GN1 (10% open space), BNG, tree canopy requirements, drainage and SuDS. Respondents ask the Council to clearly define how policy priorities will be balanced. • Objections that the policy could unintentionally favour development patterns that increase car dependency. • Requests for minimum density requirements on all allocations, not only urban sites, to support efficient land use and safeguard against low density sprawl. • Concerns from residents about the cumulative impacts of density, including environmental effects, biodiversity pressures, wildlife disturbance and pollution, particularly around sensitive coastal and rural edge locations. • Comments that density policy should remain flexible and site specific, recognising that constraints, opportunities and settlement hierarchy should shape appropriate design responses. • Some developers and land promoters support efficient land-use principles but object to policy wording that requires additional public benefits for higher densities, arguing density should be determined by urban design quality. • Additional technical observations, including from Anglian Water, highlighting that density influences the viability of community-scale water reuse systems, with efficiencies occurring above approximately 60 dph.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
PC5	Domestic Development	<ul style="list-style-type: none"> • Concerns from residents about the replacement of rural dwellings, including fears of being displaced from homes they have invested in, uncertainty around how plot size is defined and lack of clarity on whether replacement dwellings must follow the same layout, scale, or location within the countryside. • Suggestions that the policy should be updated to reflect recent update to NPPF. • Calls to strengthen policy support for building conversions, with recommendations that conversions should be “strongly supported” rather than “only supported”. • Comments that PC5 is too restrictive compared to neighbouring authorities, with suggestions to relax criteria for residential alterations and annexes to enable more flexible use of existing buildings and support higher windfall delivery. • Multiple representations request explicit wording to discourage reliance on Class Q permitted development rights for farm building conversions, due to concerns that this creates a precedent for inappropriate rural development and undermines countryside protection policies. • Supportive comments noting the importance of ensuring the design of replacement dwellings is sympathetic to rural character, maintaining landscape quality and respecting local context. • General support, indicating broad agreement with the intention of managing domestic development sensitively within rural areas.
PC6	Design and Amenity	<ul style="list-style-type: none"> • Calls for stronger emphasis on traditional architecture and heritage-led design, including requests for Traditional Architecture Design Codes, enhanced protection of pre-1950 buildings, and greater safeguarding of historic character. • Concerns that new development must reflect the character and policies of local Neighbourhood Plans.

Chapter/Policy	Summary of issues raised in representations
	<ul style="list-style-type: none"> • Support for the policy’s ambition to promote health, wellbeing and active lifestyles, with recommendations for clearer support for co-located community facilities, multi-functional green infrastructure and design that encourages physical activity. • Observations that design quality is subjective, with concerns that terms like “attractive”, “distinctive”, or “high standard” lack clear benchmarks for applicants and decision-makers. • Multiple respondents highlight the need for flexibility, noting that PC6 duplicates Policy ST8 and overlaps with other Local Plan policies, potentially constraining innovative or context responsive design. • Objections to the length of the policy, noting that the extensive list of criteria (a–r) could create conflicts between requirements, making compliance difficult. Calls for consolidation or clearer prioritisation. • Developers and design professionals request a more outcome focused, proportionate policy, allowing designed responses based on context, viability and deliverability. • Support for stronger integration of SuDS, water efficiency measures, biodiversity enhancements and climate resilient design, with specific recommendations in the public realm. • ECC request the policy be strengthened to require sustainable sourcing of construction materials and maximum recycling of construction, demolition and excavation waste to align with minerals and waste plans. • ECC highlight that PC6 lacks requirements for full-fibre or 5G-ready provision. • Comments recommending development achieve Secured By Design accreditation to ensure safe, inclusive, resilient environments. • Natural England supports the policy’s emphasis on green infrastructure networks, recognising their importance for biodiversity, climate resilience, healthy living and placemaking.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Feedback on the need to improve domestic cycle parking standards, ensuring secure, convenient storage for daily use, including e-bikes, cargo bikes, adapted cycles, and alternatives to ineffective sheds/garages. • Suggestions to streamline policy content by merging overlapping design policies (PC6, PC7, ST2, GN1) to remove duplication and create a coherent framework for high quality development.
PC7	Residential Schemes on Greenfield Sites	<ul style="list-style-type: none"> • Calls for stronger emphasis on high-quality conservation-led design, with suggestions that traditional vernacular architecture (TVA) should inform the character and sustainability of new greenfield development. • Repeated comments urging the Council to prioritise brownfield development before permitting any greenfield expansion. • Concerns about the practicality of modal shift, with local road conditions, HGV traffic and unsafe cycling routes making it difficult for greenfield sites to support active travel without major infrastructure improvements. • Observations that the policy feels generic, repetitive and insufficiently Colchester specific, duplicating national policy and existing design codes, and potentially increasing compliance burdens for smaller developers. • Objections that limiting PC7 to major greenfield sites is too narrow; several respondents argue the principles should apply to all residential development, or that a second policy should cover urban and higher density schemes. • Calls for much clearer and stronger recognition of local character and distinctiveness, especially where development adjoins Small and Medium Settlements. • Support for the policy’s role in promoting health, wellbeing and active lifestyles, with strong alignment to Sport England’s Active Design guidance and relevant NPPF paragraphs through requirements for open space and active travel.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> Concerns that the policy underplays the importance of biodiversity and integrating wildlife, despite being focused on greenfield sites. Some feel the policy is too visually orientated and insufficiently ecological. Multiple representations request that prescriptive requirements such as the mandatory central location of primary public open space be softened, allowing flexibility to respond to site context. Developers argue that PC7 is overly prescriptive and duplicative, risks conflicting with PC6, ST8, GN1, Essex Design Guide standards and parking policies, and may constrain innovation or site specific solutions. Concerns that PC7 relies on external guidance not fully defined in the Local Plan (back-to-back distances), resulting in unclear implementation and inconsistent interpretation. Calls for explicit design measures to reduce crime and anti-social behaviour, strengthening community safety and resilience. Suggestions that PC6 and PC7 (and parts of ST2/GN1) should be consolidated due to overlapping design and layout requirements. ECC recommend a major strengthening of sustainable transport expectations, proposing that PC7 explicitly requires connecting walking and cycling routes, integration of RTS, EV charging infrastructure and street and public realm design that prioritises active and sustainable modes of transport.
PC8	Private Amenity Space	<ul style="list-style-type: none"> Calls for greater emphasis on traditional vernacular architecture (TVA) and conservation led design, with some respondents arguing that historic character and traditional forms should inform amenity space standards and layout on new development. General support for the policy’s aims, including parish level endorsement of private amenity space standards, recognising their role in ensuring liveable, high quality residential environments.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter/Policy	Summary of issues raised in representations
	<ul style="list-style-type: none"> • Positive feedback on the inclusion of minimum garden sizes but concerns that gardens may still become overly paved or dominated by outbuildings. • Several representations highlight that policy wording uses vague or subjective phrases such as “easy access”, “inviting appearance”, “designed to a high standard”, “optimise its use”, “meet recreational needs” which lack clear definitions and may lead to inconsistency in decision-making. • Specific concerns that the requirement to “avoid significant overlooking” needs clearer definition, as some degree of mutual overlooking is common and acceptable. • Developers request greater flexibility in applying minimum garden size standards, suggesting they be expressed as “approximately” rather than rigidly fixed to allow for site specific design responses and innovative layouts. • Comments highlight the need for the policy to allow more balanced trade-offs between private amenity space, layout efficiency, and other competing policy requirements (canopy cover, drainage, BNG, density, parking, open space). • Respondents note that cumulative requirements across the plan risk constraining viable design solutions. • Further representations emphasise that when considered alongside site specific allocation policies, amenity space standards must not undermine the efficient use of land. • The Council should clarify which policy elements are mandatory versus flexible to avoid undermining deliverability.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
Colchester		
CC1	City Centre	<ul style="list-style-type: none"> • Support for creating active retail frontages at ground floor levels • Concern about building residential dwellings on existing car parks (as raised in other specific place policies) • Agree with need for sensitivity to historic features to be taken when developing in the city centre • Suggested that the Policy should refer to the Colchester Critical Drainage Area and need to refer to the Colchester Surface Water management Plan.
PP1	Britannia Car Park	<ul style="list-style-type: none"> • Concern about loss of convenient, accessible parking and resulting impacts on city centre vitality. • Challenge Council assumptions about existing car parking capacity. • Suggestions to keep car park and combine with providing a bus park/interchange • Suggested that the Policy should refer to the Colchester Critical Drainage Area and need to refer to the Colchester Surface Water management Plan
PP2	Vineyard Gate	<ul style="list-style-type: none"> • Concern about loss of convenient, accessible parking and resulting impacts on city centre vitality. • Challenge Council assumptions about existing car parking capacity. • Suggested that the Policy should refer to the Colchester Critical Drainage Area and need to refer to the Colchester Surface Water management Plan
PP3	St Runwalds Street	<ul style="list-style-type: none"> • Concern about loss of parking, although less comments made than on PP1 and PP2. • Suggested that the Policy should refer to the Colchester Critical Drainage Area and need to refer to the Colchester Surface Water management Plan.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
PP4	Braiswick	<ul style="list-style-type: none"> • Concerns that PP4 is undeliverable due to unresolved access, reliance on third party land, and no mechanism to secure infrastructure delivery. • Objections that the site performs poorly on sustainability grounds, with significant unresolved impacts on landscape character, biodiversity, and drainage. • Infrastructure capacity concerns, including uncertainty over safe and suitable access and wider cumulative impacts. • Loss of coordinated planning approach following earlier multi-site strategy, weakening landscape protection and shared infrastructure opportunities. • Requests for greater recognition of equestrian use and provision for safe riding routes as part of active travel. • Support for policy elements relating to water management, drainage requirements, and avoidance of pollution and flood risk. • Safety concerns about Bakers Lane, with objections that it is unsuitable for active travel. • Suggested that the Policy should refer to the Mile End Critical Drainage Area and need to refer to the Colchester Surface Water management Plan
PP5	Chesterwell	<ul style="list-style-type: none"> • Objections that PP5 would extend Chesterwell beyond its planned 1,600-dwelling cap, creating unsustainable greenfield infill and undermining the existing Green Infrastructure Strategy. • Concerns that further development would increase pressure on already stretched local infrastructure, including schools, services and highway capacity, with expectations of increased congestion. • Issues raised over potential heritage impacts, with calls from Historic England for a Heritage Impact Assessment to ensure appropriate mitigation given the site's relationship to nearby listed assets.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> Concerns from local residents and community organisations that the allocation is not justified or supported by proportionate evidence, particularly regarding cumulative impacts and infrastructure capacity. Requests to incorporate multi-user routes, including provision for equestrians, into any new access or connectivity proposals in and around the site. Recognition from utilities providers of the need for robust drainage and wastewater solutions, including separate foul and surface water systems and avoidance of new surface-water connections to combined sewers. The Environment Agency notes that areas of the site fall within Flood Zones 2 and 3, recommending further assessment through a Level 2 Strategic Flood Risk Assessment.
PP6	North Station	<ul style="list-style-type: none"> The proposal is considered inappropriate infill development, resulting in the loss of station car parking, green space, and a valued walking and cycling route between New Braiswick Park and Colchester North Station. Concern about increased traffic, congestion, and parking displacement, particularly at North Station Roundabout, Bergholt Road, Cymbeline Road, and Three Crowns Road, with associated highway safety and emergency access issues. Objections that the development would undermine sustainable travel, worsen air quality, and harm biodiversity, conflicting with climate change and sustainability objectives. The allocation is viewed as speculative, with insufficient evidence of landowner support, deliverability, infrastructure capacity, or mitigation of identified impacts. Concerns that access arrangements are poor and potentially unsafe, relying on constrained residential roads with restricted visibility. Flood risk issues identified, including the presence of Flood Zones 2 and 3, requiring further assessment through a Level 2 SFRA.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Water and wastewater infrastructure constraints highlighted, with requests for SuDS, reduced surface water runoff, and protection of existing utility assets. • Objection to any significant retail development, due to potential harm to the vitality and viability of Colchester city centre. • Concerns that local stakeholders have not been adequately engaged in proposals affecting the station and its surroundings.
PP7	Bakers Lane	<ul style="list-style-type: none"> • Objections that Bakers Lane is a narrow, winding rural road wholly unsuitable for additional traffic, with repeated concerns about congestion, road safety, lack of pavements, single lane bridges, and unsafe conditions for pedestrians. • Repeated emphasis that the site has previously been refused and dismissed on appeal, with the Inspector finding the location unsustainable, harmful to rural character, and unacceptable in terms of heritage impact and highway safety. • Concerns that the development would place further pressure on already overstretched local infrastructure, including schools, healthcare, drainage, utilities, and the local highway network. • Fears about loss of green space, biodiversity impacts, flood risk, and harm to the semi-rural landscape, including references to ancient woodland and locally important habitats. • Heritage concerns relating to the setting of designated assets, with calls from Historic England for a full Heritage Impact Assessment and deletion of the allocation if harm cannot be mitigated. • Comments that the cancellation of A12/A120 upgrades has worsened congestion, increasing reliance on Bakers Lane as a “rat run” and compounding safety risks. • Anglian Water highlights the need for robust drainage, SuDS, separation of foul and surface water, and confirmation of wastewater treatment capacity.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> The site promoter notes willingness to provide pedestrian connections, crossings, and policy compliant affordable housing.
OA4	Northern Gateway	<ul style="list-style-type: none"> Support for high-quality green infrastructure, conservation and climate-positive design. Objection to impacts on Bridleways 233 and 232, with requests to preserve them and upgrade Footpath 231 for safe multi-user crossing. Active travel must include horse riding, with inclusive multi-user routes and better off-road connectivity. Policy seen as too restrictive on housing capacity, with calls for higher densities and post-Covid flexibility in land uses. NHS bodies request early involvement to plan specialist accommodation and manage health impacts. Lack of clarity over employment land designations, with support for office-based employment and protection of employment areas. Review to ensure comprehensive support for growth and redevelopment across North Colchester with flexible wording for infrastructure, community, and sports uses. Objections to significant retail development to protect the city centre; support for strict sequential and impact testing. Support for key infrastructure including a Blue Light Hub, robust water and drainage requirements, SuDS, and protection of existing utilities.
PEP1	Colchester Business Park	<ul style="list-style-type: none"> Support for policy criteria relating to improving water efficiency, ensuring wastewater treatment capacity and avoidance of pollution and flood risk. Anglian Water highlights the need for SuDS, adequate drainage and separation of foul and stormwater.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
PP8	Lakelands	<ul style="list-style-type: none"> • Support for policy criteria relating to improving water efficiency, ensuring wastewater treatment capacity and avoidance of pollution and flood risk. • Anglian Water highlights the need for SuDS, adequate drainage and separation of foul and stormwater. • Site promoter considers that the larger site has the potential to deliver an increased quantum of 102 dwellings.
PEP3	Tollgate West	<ul style="list-style-type: none"> • Proposed allocation for employment use does not acknowledge the potential for other uses to come forward on the site. Site promoter indicated they are reviewing potential amendments to the current permission. • Concerns that any further expansion of retail would significantly impact the economic viability of the city centre and views expressed a preference not to see any more significant retail offered at this location.
PEP4	Maldon Road	<ul style="list-style-type: none"> • Support for policy criteria relating to avoidance of flood risk and pollution risks. • Anglian Water consider policy lacks a criterion for attenuated surface water discharge, which may be an oversight. • Anglian Water highlights that no new surface water connections to the combined sewer will be accepted, and the need for separation of foul and stormwater. • Also request wording to safeguard access for maintenance of existing sewerage infrastructure and protect assets within site boundaries. • Comments that this is a densely populated area for horse riders. Any active travel links must include equestrians.
PP9	North East Colchester	<ul style="list-style-type: none"> • Concern that development of the site will cause irreversible damage to the natural environment, affecting environmentally sensitive habitats including Bullock Wood SSSI (which includes ancient woodland) and wildlife corridors to other sites such as Welsh

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy	Summary of issues raised in representations
	<p>Wood, Wall's Wood and Salary Brook that are home to a wide variety of wildlife whose habitats will be lost.</p> <ul style="list-style-type: none"> • Recommend that buffers around ancient woodland boundary is increased to 30-50m • Concern that part of the site is Grade 2 agricultural land, the loss of which will impact on food production • Many respondents state how the site is a valued green space in an urban area, providing a quiet, natural space for walking and recreation and that the loss of it would impact significantly on their mental and physical health and connection to nature. • Concern that development of the site will affect a landscape that has been recognised as being of high value (specifically as a special landscape area), and its loss will remove a key undeveloped green gap and substantially change locally valued views • Concern that the site lies outside the current Local Plan settlement boundary and building on it would likely cause coalescence issues with the Tendring Colchester Borders Garden Community (TCBGC) • Concern about the capacity of the local road network to cope with increased traffic from development when roads are already gridlocked and the level of traffic impacts upon resident safety. Also concern proposed access routes will not be suitable such as that from Bromley Road. • Concern that cumulative impacts of the development with the nearby future growth of the TCBGC have not been assessed • Concern about impact of scale of growth on GP surgeries and hospitals, with local GP surgeries having long waiting lists and hospitals are overstretched and lacking capacity. • Concern that there are already flooding issues on neighbouring roads, and that loss of green space on the site replacing this with hard surfaces will worsen these issues. Raised that site will require a further detailed flood risk assessment due to areas of site being in flood zones 2 and 3.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Concern about capacity of local utilities infrastructure to serve the development including wastewater treatment capacity and water supply. • Concern that the site allocation conflicts with soundness tests within the National Planning Policy Framework • Request that brownfield sites should be re-considered ahead of this site for housing, including some previously assessed through the SLAA. • ECC request that the Plan specifically allocates 2.18ha of land suitable to provide for a Primary school and early Years Education facility.
PP10	Berechurch Hall Road	<ul style="list-style-type: none"> • Concern that existing road network already heavily congested. Proposed 875 homes would significantly worsen congestion and create unsafe conditions at junctions. Concerns about construction traffic, access and speeding issues. • Number of concerns raised that the level of development proposed is disproportionate. • Existing cycling infrastructure is seen as inadequate; walking and cycling infrastructure upgrades needed. • Objections to loss of open countryside, farmland and valued open space. • Fears that development will erode rural/village identity of surrounding villages. • Site considered environmentally sensitive due to proximity of nearby sites (Roman River Valley, SSSI, Gosbecks Archaeological Park and Friday Woods). • Comments report presence of diverse wildlife and birdlife that rely on the site. Calls for an independent ecological assessment. • Concern about declining wellbeing from traffic, pollution, noise and loss of nature; concerns that policy does not protect existing residential amenity and impact on residents. • Concerns about flooding from the loss of permeable farmland. • Concerns about infrastructure capacity: healthcare and local schools are reported as already overcapacity; wastewater and water supply infrastructure concerns raised.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy	Summary of issues raised in representations
	<ul style="list-style-type: none"> • Concerns that only minimal local facilities exist and lack of employment opportunities. • Public transport described as poor and unable to support sustainable travel. • Site promoter supports allocation but concludes that the allocated number of dwellings are undeliverable due to constraints. • Concerns policy is underpinned by high-level aspirations rather than clear evidence of deliverability or certainty. • Concern over heritage and archaeology: site sits between sensitive heritage and archaeological sites. • Historic England require a full Heritage Impact Assessment to determine whether the site is suitable from a historic environment perspective and identify any mitigation measures. • Number of concerns from local equestrians regarding absence of bridleways and safe routes for horse riders. Development should not impact on existing Bridleways. • Natural England welcome requirement to mitigate recreational disturbance to Roman River SSSI. • ECC comment that development should adhere to SuDS Guide for Essex, and follow the drainage hierarchy. Wording also required for policies that require a Mineral Resource Assessment. • Anglian Water support policy criteria relating to flood risk and pollution risk; water supply. New developments must provide adequate drainage for foul and stormwater in separate networks. • Sport England require consideration for outdoor sports facilities due to additional demand generated. • View expressed a preference not to see any significant retail development that could threaten the retail offering of the city centre.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
PP11	Europit Site	<ul style="list-style-type: none"> Support policy wording addressing flood risk mitigation, water efficiency, wastewater treatment capacity and phasing. Suggest consideration for rainwater harvesting as in critical drainage area.
PP12	Land at Robertson Van Hire	<ul style="list-style-type: none"> Support policy wording addressing flood risk mitigation, water efficiency, wastewater treatment capacity and phasing. Suggest consideration for rainwater harvesting as in critical drainage area.
PP13	146 Magdalen Street site	<ul style="list-style-type: none"> Support policy wording addressing flood risk mitigation, water efficiency, wastewater treatment capacity and phasing. Suggest consideration for rainwater harvesting as in critical drainage area.
PP14	Gas Works and Scrap Yard	<ul style="list-style-type: none"> Deliverability and land ownership concerns, with objections that the allocation covers multiple parcels in different ownerships. Highway capacity and traffic impacts, including concerns that existing congestion in the Hythe area would be exacerbated. Flood risk constraints, with parts of the site located within Flood Zones 2 and 3, surface water flooding risks, and potential residual risk associated with the Colne Barrier, prompting requests for a Level 2 SFRA. Pressure on local infrastructure and services, including concerns about capacity of schools, GP surgeries and wider community facilities. Heritage impacts, due to the site's proximity to the Distillery Pond Conservation Area and nearby Grade II listed buildings. Environmental and amenity impacts, including contamination from former industrial uses. Concerns about policy clarity and prematurity. Support for strong water management and drainage requirements.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • The site should no discharge surface water in the foul/combined sewers. • Opportunities for enhanced active travel and green infrastructure, particularly through the integration and upgrading of Public Rights of Way to provide safe, connected multi-user routes. • Requests for continued engagement with emergency services.
PP15	Hawkins Road	<ul style="list-style-type: none"> • Concerns over deliverability, due to multiple land ownerships and the lack of a clear mechanism to secure coordinated or phased delivery. • Highway capacity and congestion issues, with objections that the surrounding road network in the Hythe area is already constrained and unsuitable to accommodate additional traffic. • Significant flood risk constraints, including areas within Flood Zones 2 and 3, surface water flooding, and residual risk associated with the Colne Barrier. • Requests for further evidence, including a Level 2 Strategic Flood Risk Assessment to demonstrate site suitability and policy compliance. • Heritage impacts, given the site's proximity to the Distillery Pond Conservation Area and nearby Grade II listed buildings, requiring a Heritage Impact Assessment and mitigation. • Pressure on local infrastructure and services, including schools, healthcare, and wider community provision. • Environmental and amenity concerns, including land contamination from former industrial uses, impacts on biodiversity, and effects on nearby allotments and local character. • Developers should adhere to the standards in the Sustainable Systems Design Guide for Essex.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
PP16	Coal Yard Site	<ul style="list-style-type: none"> • Support for strong water management and green/blue infrastructure led solutions, including SuDS, water efficiency, pollution avoidance, and safeguarding of existing wastewater infrastructure. • Requests for further evidence, including the need for a Level 2 Strategic Flood Risk Assessment to justify the allocation and assess regeneration benefits against flood and climate risks. • Heritage impacts, due to the site’s proximity to the Colchester Hythe Conservation Area and nearby Grade II listed buildings, requiring a Heritage Impact Assessment and appropriate mitigation. • Highway capacity and congestion concerns, with objections that additional development would worsen existing traffic issues and calls for wider network interventions. • Support for strong water management and pollution mitigation measures, including SuDS, water efficiency, and safeguarding of existing wastewater infrastructure.
OA1	King Edward Quay	<ul style="list-style-type: none"> • Need for further flood risk evidence, including a Level 2 Strategic Flood Risk Assessment to demonstrate site suitability and appropriate mitigation. • Infrastructure capacity concerns, including highway safety, poor pedestrian environments, traffic impacts from heavy vehicles, and pressure on school and transport provision. • Support for strong water management and green/blue infrastructure led solutions, including SuDS, water efficiency, pollution avoidance, and safeguarding of existing wastewater infrastructure. • Concerns over land use balance, with requests to avoid significant retail development that could undermine the city centre, alongside questions about residential parking provision and social cohesion. • Support for mixed-use neighbourhoods.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Need to include that the site is within a Waste Consultation Area – additional wording provided by ECC.
OA2	Land East Hawkins Road	<ul style="list-style-type: none"> • Need for further flood risk justification, including a Level 2 Strategic Flood Risk Assessment and clarity on whether development is appropriate given policy restrictions on Flood Zone 3b. • Infrastructure capacity and cumulative impact concerns, particularly in relation to traffic congestion and the combined effects of growth in the Hythe area and Garden Community. • Concerns over employment and land use balance, with calls for greater provision of jobs and light industrial uses to reduce out commuting and pressure on the highway network. • Some concern that any new retail uses would dilute retail offering in City Centre • Heritage considerations, due to proximity to the Colchester Hythe Conservation Area and nearby listed buildings, requiring a Heritage Impact Assessment and mitigation. • Support for strong water management and green/blue infrastructure led solutions, including SuDS, flood storage, pollution control, and safeguarding of wastewater infrastructure.
OA3	Magdalen Street	<ul style="list-style-type: none"> • Noted site is adjacent to Conservation Area so will need to take into consideration recommendations from Heritage Impact Assessment and incorporate into policy.
PEP2	Knowledge Gateway	<ul style="list-style-type: none"> • Need for clear integration of heritage considerations, with a requirement for a Heritage Impact Assessment to inform site suitability, mitigation and enhancement. • Support for economic growth linked to the University and Knowledge Gateway, with recognition of further development potential.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> Requirement for robust flood risk and water management criteria, including SuDS, water efficiency and adequate wastewater capacity. Concern about flood risk, including areas in Flood Zones 2 and 3, climate change impacts, and residual risk from potential failure of the Colne Barrier. Recommendation that the site be subject to detailed assessment through a Level 2 SFRA before being progressed.
UE1	University of Essex	<ul style="list-style-type: none"> New infrastructure should be designed as multi-user routes (MURs) to ensure inclusivity for all non-motorised users. It is essential there is early consultation with Essex Police regarding the expansion of the University including research facilities and future student accommodation.
Marks Tey		
PP17	Land South of A12	<ul style="list-style-type: none"> Development scale seen as disproportionate; fears of villages merging and losing identity. Housing should prioritise meeting local needs. Split of development north/south of A12/A120 worsens existing severance; sites viewed as poorly located and car-dependent. Concerns over safety, congestion, noise, and pollution. Access points considered unsafe or impractical. A12/A120 already at or over capacity; cancelled upgrades worsen concerns. Doubts about deliverability without strategic road solutions; calls for fully funded A120 upgrades. Concerns insufficient public transport capacity; comments that Marks Tey Station parking full and some rail services at capacity. Fear development would hinder future major road improvements.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy	Summary of issues raised in representations
	<ul style="list-style-type: none"> • Repeated call for infrastructure-first approach (roads, schools, healthcare, utilities, public transport). Comments that the site was previously rejected on infrastructure grounds. • Need for community facilities and recreational areas; protection of green spaces and PRoWs. Sport England advises preparing an open space, sport and recreation strategy. • Concern over loss of high-quality agricultural land and greenfield sites. • Concern over harm to ancient woodland, habitats (e.g., Pits Wood), species; need to respect Local Nature Recovery Strategies and Roman River/Colne Valleys. • Concerns over conflict with Neighbourhood Plans. • Lack of clear rationale for concentrating growth at Marks Tey; fails to explain why some land has been discounted; testing of reasonable alternatives not clear; little made of station and surrounding land; concern allocations are land-ownership-driven rather than design-led. • Repeated demand for a comprehensive Marks Tey MasterPlan for whole growth area addressing vision, phasing, infrastructure timing, and design principles. MasterPlan should address severance and access issues. • Some suggestion a new policy identifies the broad location for growth and masterplan is undertaken through a Supplementary Plan. Settlement Spatial Plan submitted for consideration as proposed basis for growth and policies. • Some support for Marks Tey as a sustainable location, but concern what can realistically be delivered in Plan period with major infrastructure requirements. • Requests for safe pedestrian/cycle routes, including bridges across A12/A120. • Requirement to consider equestrian and Public Right of Way impacts and include equestrian connections.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Site promoter supports policy; additional land now available following cancellation of A12 widening with supporting infrastructure. Concerns raised over viability assessment and infrastructure cost assumptions. • Historic England requires full Heritage Impact Assessment to confirm site’s suitability from a historic environment perspective. • National Highways comment that A12 and A120 corridors are not capable of accommodating additional growth without significant intervention. Currently no proposals for capacity enhancements on either route. • Infrastructure providers including Anglian Water, North East Essex Alliance ICB and Essex County Council (Education) agree to continue to work collaboratively to confirm satisfactory solutions to support the allocation for essential infrastructure needs and support comprehensive MasterPlanning.
PP18	Land North of A120	<ul style="list-style-type: none"> • Some support for a comprehensive masterplan for the whole Marks Tey Growth Area, respondents object to piecemeal allocations. • Concern development would place pressure on the A120 and A12, which are already heavily congested. • Repeated concerns about infrastructure (roads, schools, healthcare, utilities and public transport) with repeated calls for an infrastructure-first approach. • Widespread objection to the scale of development proposed, with concerns that it would fundamentally change the character of Marks Tey. • Concern regarding the existing physical divide created by the A12, A120 and railway line and need for bridge. • Some suggestion a new policy identifies the broad location for growth and masterplan is undertaken through a Supplementary Plan. Settlement Spatial Plan submitted for consideration as proposed basis for growth and policies. • Concern that the proposals would result in significant environmental harm.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Objections that the allocation is not deliverable, referencing previous Inspector decisions. • Concern that the Preferred Options Local Plan conflicts with the adopted Marks Tey Neighbourhood Plan. • Concerns regarding inadequate provision for active travel routes (walking, cycling, equestrian). • Concerns regarding proximity of neighbouring authorities proposed growth and need for coordination. • Concerns about water supply, wastewater capacity and flood risk. • Some response suggesting development should be located to the South of Marks Tey. • Infrastructure providers including Anglian Water, North East Essex Alliance ICB and Essex County Council (Education) agree to continue to work collaboratively to confirm satisfactory solutions to support the allocation for essential infrastructure needs and support comprehensive MasterPlanning.
PEP5	Land South of A12	<ul style="list-style-type: none"> • Concerns raised over existing infrastructure capacity and congestion. • Development should demonstrate that additional vehicular movements can be accommodated on the A12 and A120 without significantly increasing congestion. • Not clear how the employment relates to the rest of Marks Tey and how it would be accessed safely. Designation should be reconsidered as part of masterplan for Marks Tey, to include a strategic solution for trunk roads. • Some suggestion a new policy identifies the broad location for growth and masterplan is undertaken through a Supplementary Plan. Settlement Spatial Plan submitted for consideration as proposed basis for growth and policies. • Concerns expressed that the allocation is no longer deliverable following decision not to proceed with A12 improvement. • Route for A12 should be safeguarded.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • ECC recommend a comprehensive masterplan for the whole Marks Tey Growth Area. With the cancellation of the A12 widening scheme the site would require extensive junction work to make it work safely. PEP5 site is severed from the local community and the two new strategic residential allocations. • Multi-user tracks should be considered to ensure connectivity. • Historic England require full Heritage Impact Assessment to confirm site’s suitability from a historic environment perspective. • Site promoter supports allocation for employment uses, which promoter considers alongside residential allocation represents a sustainable development. • Support for allocation in because of relationship to the strategic highway network. • Anglian Water support policy criteria. Expected that employment site of this scale should have the means to ensure that surface water is attenuated and discharged in accordance with drainage hierarchy. • View expressed a preference not to see any significant retail development that could threaten the retail offering of the city centre.
PEP6	Anderson’s Site	<ul style="list-style-type: none"> • Concerns over light pollution • Concern over increased lorries and vans to the A120 and Old London Road junction. • Development should demonstrate that additional vehicular movements can be accommodated on the A12 and A120 without significantly increasing congestion • View expressed a preference not to see any significant retail development that could threaten the retail offering of the city centre. • Close proximity to bridleway. Care should be taken to not impact existing Public Right of Way; and maximise accessibility. Equestrian interests should be considered. • Supporting text should clarify planning status. • Policy criteria needed to guide applications and ensure infrastructure protection; flood and pollution risk; and sustainable drainage.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> ECC consider employment areas would also benefit from comprehensive masterplan.
Tiptree		
PP19	Land North of Oak Road	<ul style="list-style-type: none"> Concern that policy will lead to increased vehicle movements on small roads/country lanes nearby impacting small villages and thus effective traffic mitigation is required. Support reference to provision of health/community building and improvements to sustainable transport through proposed mobility hub but recommend provision of these facilities needs greater clarity in policy to ensure delivery Support for provision of proposed Country Park provision but should consider ways to provide inclusive access to many users, alongside potential for sport provision Support reference to protection of local heritage assets and HIA should inform improvements to policy criteria as appropriate. Request policy needs criteria to mitigate development impact on flood and pollution risk, manage surface water, improve water efficiency and ensure phased wastewater treatment capacity is available.
PP20	Land at Bonnie Blue Oak	<ul style="list-style-type: none"> Request policy needs criteria to mitigate development impact on flood and pollution risk, manage surface water, improve water efficiency and ensure phased wastewater treatment capacity is available. Concern that policy will lead to increased vehicle movements on surrounding congested network (including Oak Road) and thus effective transport mitigation required. Recommend alternative site access to be via Elms Farm rather than from Oak Road.
PP21	Highlands, Kelvedon Road	<ul style="list-style-type: none"> Request policy needs criteria to mitigate development impact on flood and pollution risk, manage surface water, improve water efficiency and ensure phased wastewater treatment capacity is available.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> Concern that policy will lead to increased vehicle movements on surrounding congested network and thus effective transport mitigation required.
PP22	Telephone Exchange	<ul style="list-style-type: none"> Request policy needs criteria to mitigate development impact on flood and pollution risk, manage surface water, improve water efficiency and ensure phased wastewater treatment capacity is available. Also should establish safeguarded access to maintenance of existing water main on site. Support for development that would respect listed buildings and improve area's look.
PEP7	Highland Nursery	<ul style="list-style-type: none"> Request policy needs criteria to mitigate development impact on flood and pollution risk, manage surface water, improve water efficiency and ensure phased wastewater treatment capacity is available. Request for greater clarity over site location/area to provide distinction between this site and PP21. Support policy and encourage that it promotes mixed employment uses alongside opportunities to provide public transport connections.
PEP8	Land South of Factory Hill	<ul style="list-style-type: none"> Request policy needs criteria to mitigate development impact on flood and pollution risk, manage surface water, improve water efficiency and ensure phased wastewater treatment capacity is available. Support for active travel connections in policy. Will need to consider intervisibility between site and existing Grade II listed house.
West Mersea		
PP23	Land East of Dawes Lane	<ul style="list-style-type: none"> Repeated and widespread objections that Mersea Island does not have the infrastructure capacity to support 300 additional homes, with particular concern about GP services, dentistry, schools, utilities, parking, and local shops, many already at or beyond capacity.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy	Summary of issues raised in representations
	<ul style="list-style-type: none"> • Significant concern that the island’s single access road (The Strood) is regularly cut off by tidal flooding, restricting access for residents, emergency services, buses, and school transport, with fears this will worsen due to sea level rise and climate change. • Objections that the sewage and wastewater system is already failing, with regular spills impacting the Blackwater Estuary, shellfish waters, bathing waters, and the local oyster industry, and that further growth would exacerbate pollution. • Concerns about the unsustainable scale of development, noting Mersea’s unique island constraints, high seasonal population increases, and the disproportionate impact of 300 dwellings in a small, environmentally sensitive settlement. • Many residents highlight the island’s environmental designations (SSSI, SPA, SAC, Ramsar, MCZ) and argue that cumulative ecological impacts, including on wildlife (Mersea is a sanctuary for red squirrels), marine habitats, coastal erosion, and greenfield land, have not been adequately assessed. • Concerns that increased traffic from 300 homes—potentially 600+ cars—would worsen congestion, reduce road safety on narrow routes such as Dawes Lane and East Road, and intensify parking pressures, especially during peak tourist months. • Concerns over emergency evacuation risks, given flooding of The Strood, the island’s ageing population, and proximity to Bradwell. • Objections that the proposal contradicts sustainable transport aims, given limited and unreliable public transport, no rail access, and no safe cycle routes to Colchester. • Many argue that Mersea is already at or beyond a sustainable scale of growth, with some citing an upper capacity of around 130 homes based on earlier evidence. • Repeated calls for infrastructure first planning, with residents stressing that development should only proceed if major upgrades—healthcare, schools, wastewater capacity, road access, public transport—are delivered upfront. • Concerns that second home ownership (including full time occupation of caravans), tourism pressures, and seasonal surges already strain resources, and additional

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<p>housing risks further eroding local character, community cohesion, and affordability for younger residents.</p> <ul style="list-style-type: none"> Statutory and technical consultees request heritage impact assessments, safe pedestrian connections, and stronger policy safeguards.
Wivenhoe		
PP24	Land northwest of the Fire Station	<ul style="list-style-type: none"> Concern about level of housing allocation, considering the growth occurring at the garden community. Clarity requested about size, types and uses for the 'community space' identified in the policy with suggestions made to support multi-user access. Concern about loss of coalescence green gap identified in the Wivenhoe Neighbourhood Plan. Suggestions to consider directing contributions from development to cycle path improvements at Wivenhoe Trail and improving facilities at Broad Lane Sports Ground. Concern about access to the site crossing existing foot/cycle path Concern that proposed growth will put strain on existing infrastructure (primary/secondary schools, public transport, GP, playing fields) and therefore greater infrastructure contributions required. Wish to see a habitat corridor created between strategic biodiversity areas east and west of main Wivenhoe town. Current allocation site lies within the gap between the two strategic biodiversity areas.
Abberton and Langenhoe		
PP25	View Park	<ul style="list-style-type: none"> Insufficient infrastructure capacity, particularly sewage treatment, healthcare, school places, water pressure, and utilities, with strong concern that services are already overstretched.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy	Summary of issues raised in representations
	<ul style="list-style-type: none"> • Significant traffic and road safety issues on Fingringhoe Road, Mersea Road and Peldon Road, including congestion, lack of footpaths, hazardous junctions, and rural roads not suited to increased vehicle movements. • Widespread opposition to expanding the settlement boundary, with fears of enabling further unplanned development and causing coalescence between Langenhoe and Fingringhoe. • Concerns about cumulative growth, with many highlighting that over 57–60 homes are already under construction and that the village has reached or exceeded previous assessed capacity. • Impacts on rural character, landscape, green gaps, biodiversity, and heritage, including proximity to Grade II listed buildings and the need to retain mature trees, hedgerows, and field boundaries. • Objections to the site’s location, described by some as Abberton-focused and poorly connected to village facilities; suggestions that alternative sites may be more sustainable. • Requests for safe, adoptable pedestrian links, multiuser routes, and better green infrastructure, particularly for equestrians and non motorised users. • Support for the allocation from some respondents (including the Parish Council and landowners) provided strict conditions are applied, including infrastructure capacity confirmation and strengthened environmental protection. • Developer representations arguing the allocation is suitable and deliverable but recommending refinement for flexibility and practical implementation. • Alternative sites submitted. • Individual concerns about noise, disruption, loss of privacy, and long-term negative effects on community cohesion and amenity.
Boxted	

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
PP26	Land north of Boxted Straight Road	<ul style="list-style-type: none"> • Opposition due to the scale of development, highway safety and traffic concerns, unsustainable location and car dependency, • Overstretched infrastructure concerns including schools, healthcare, wastewater and drainage capacity. • Heritage impact assessment is required. • Loss of high-quality agricultural land with concerns over the loss of food security. • Impact on landscape, tranquility and dark skies with impacts extending into the Dedham Vale National Landscape. • Many comments, including those from Boxted Parish Council, stated conflicts with the Boxted Neighbourhood Plan.
Chappel and Wakes Colne		
PP27	Swan Grove	<ul style="list-style-type: none"> • Some support for policy with respondents considering this is a good location and proportionate to size of village. • Concerns raised over impact on traffic on surrounding roads. • Some concern this is overdevelopment for a small village; inadequate services and infrastructure; incidents of flooding. • Concern over cumulative impact of development in the area. • Concern over lack of sustainable transport; lack of active travel infrastructure; road safety; busy road with no crossings. • Suggestions for new footpaths and safe pedestrian access, and additional parking. • Development should fit in with rural character. • The site is located within the setting of a number of Grade II listed buildings, and potentially within the setting of the Chappel Conservation Area. Historic England notes that a Heritage Impact Assessment will help to confirm suitability from a historic environment perspective and identify appropriate mitigation or opportunities for enhancement.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> Request for houses to meet local need.
PP28	Land West of Station Road	<ul style="list-style-type: none"> Repeated view that 200 homes is excessive, out of scale with Wakes Colne’s rural character, and represents overdevelopment; many call for a significant reduction in numbers. Repeated requests for directing growth to better-serviced settlements instead. Concern that the scheme would double the size of the village, seen as unsustainable. Infrastructure seen as inadequate: schools, healthcare, community facilities, and transport already operating under strain and unlikely to cope with further pressure. Significant worries about water supply, sewerage and treatment capacity, described as already struggling. Frequent mention of increased surface-water run-off and heightened flood risk. Significant concern for highway and road-safety impacts; existing routes (A1124, Station Road) viewed as narrow, dangerous, or unsuitable for traffic increases. Fears that traffic restrictions will shift vehicles onto unsuitable rural lanes (e.g. Spring Gardens Road), creating rat-runs and safety risks for walkers and horse riders. Concern about unsafe junctions and poor sightlines along the A1124; some view the proposed layout as hazardous. Views expressed that the proposal is environmentally damaging, threatening wildlife, habitats, farmland, and increasing light pollution. Comments placing an emphasis on protecting dark skies and the activities of the local observatory from increased lighting. Landscape concerns regarding the site’s visibility across the valley, and calls for design that respects the rural setting plus strict lighting controls. Many state the development lacks adequate active-travel provision; pavements are narrow/absent, walking routes unsafe, and public transport unreliable. Additional measures requested.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Rail service raised as an issue, with comments that the peak-hour train already at capacity. • Heritage concerns include proximity to the Grade II* Church of All Saints and Chappel Conservation Area; Historic England recommends a proforma Heritage Impact Assessment.
PEP12	Land at Wakes Hall Business Centre	<ul style="list-style-type: none"> • Concerns raised in relation to lack of infrastructure including accessibility by all modes and sustainable transport; and impact on local road network. • Concerns raised over loss of farmland and open space; encroachment into the countryside towards adjacent parishes; further urbanisation of rural village; and risk of flooding. • Comment regarding job creation and developments serving a wider catchment rather than local needs. • Site potentially located within the setting of five Grade II listed buildings and the Grade II* Church of All Saints. Historic England notes that a full Heritage Impact Assessment will be required to confirm suitability from a historic environment perspective and identify appropriate mitigation. • Anglian Water request policy criteria to mirror other policies; to recognise that network and WRC capacity is dynamic and can change over time owing to a range of factors; and in relation to discharging to the foul water network.
Copford		
PP29	Land East of School Road	<ul style="list-style-type: none"> • Concerns that the scale of development seen as disproportionate, risking harm to rural character and the Copford Green Conservation Area. • Viewed as conflicting with the Copford & Easthorpe Neighbourhood Plan, especially policies resisting large-scale growth; requiring high-quality design and safe access; and taking account of local housing need.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy	Summary of issues raised in representations
	<ul style="list-style-type: none"> • Concerns about cumulative impacts alongside nearby developments and lack of holistic cross-boundary assessment. • Suggestion to refurbish the existing village hall rather than replace it; local trustees should be involved in decisions. • Repeated concerns raised on infrastructure capacity: schools, healthcare, drainage, water supply, and sewage treatment already under strain. • Existing road network capacity considered inadequate; concerns over potential congestion issues; public transport is extremely limited and lack of parking at Marks Tey Station. • School Road described as narrow and used as a rat-run, posing safety risks for children near the school and village hall. • Comment that Copford will be on the line of a major cycle route. Suggestions made for reducing the attractiveness of country lanes for motor vehicle drivers and stopping rat runs. • Objections to loss of agricultural land and rural landscape erosion. • Concerns raised about impacts on Pits Wood Local Wildlife Site, sensitive biodiversity, protected species, and inadequate buffer zone; • Policy wording inadequate as drafted to address concerns regarding the LoWS and Woodland. • Concern at proximity to Roman River and threat to water quality by developments upstream. • Equestrian users request additional infrastructure in this area to increase accessibility to the existing network and be at least of bridleway status. • One site promoter supports Policy. Request for allocation boundary to be extended marginally, and flexibility to criterion to support timely delivery and community benefit. • One site promoter supports a residential allocation but objects to the extent of the proposed allocation and requests additional land to the north of Pits Wood.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Alternative sites suggested. • Anglian Water supports policy but requests exclusion of land around the pumping station and installation of a buffer. • National Highways state A12 J26 is currently operating very close to capacity and is not capable of accommodating additional growth without significant intervention.
Dedham and Dedham Heath		
PP30	Land South of Long Road	<ul style="list-style-type: none"> • General support for a high quality, conservation led approach with the proposed scale considered proportionate. • Dedham Parish Council supports the allocation but stresses the majority should be affordable to meet local needs. • Protection of the landscape character and rural setting noting the sensitive location adjacent to the Dedham Vale National Landscape: avoidance of urbanising features and protection of dark skies are mentioned. • Wastewater and drainage capacity concerns. • Request to improve the cycle connections to surrounding villages.
Eight Ash Green		
PP31	Land East of Wood Lane	<ul style="list-style-type: none"> • Some support for opportunities for linking bridle ways. • Support in principle from some respondents, citing alignment with the Council's spatial strategy, deliverability, consolidation of growth north of the A1124, and the use of defensible boundaries. • Strong objections to scale and location of development, with concerns that the proposed housing would fundamentally alter its rural character. • Significant transport and highway safety concerns, particularly congestion on the A1124/Halstead Road, unsafe junctions, limited pedestrian and cycle infrastructure, and cumulative impacts from recent and proposed developments.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Concerns with Infrastructure capacity constraints, including pressure on GP surgeries, schools, dentists, public transport, utilities and community facilities, with limited evidence that these can be adequately expanded. • Concerns about ribbon development, coalescence and loss of settlement identity. • Conflict with the adopted Neighbourhood Plan. • Landscape, townscape and visual impact concerns, including loss of open countryside. • Biodiversity and environmental concerns including impacts on Choats Wood. • Flood risk and drainage issues, with the need for further assessment through a Level 2 SFRA and robust SuDS design. • Water and wastewater infrastructure concerns, with Anglian Water highlighting the need for clearer policy criteria. • National Highways state A12 J26 is currently operating very close to capacity and is not capable of accommodating additional growth without significant intervention.
PP32	Land West of Fiddlers Wood	<ul style="list-style-type: none"> • Support for the allocation from some respondents, citing alignment with the Council's spatial strategy and preference over alternative sites south of the road. • Objections to the scale and location of development, with concerns that PP32 represents disproportionate growth, extends development into open countryside and fundamentally alters the rural character of Eight Ash Green and Aldham. • Landscape and visual impact concerns. • Concerns for ribbon development and coalescence. • Transport and highway capacity concerns. • Concerns for infrastructure facilities in the village, lack of public transport, poor pedestrian, cycle connectivity and including pressure on GP surgeries, schools, school transport, utilities and community facilities.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Impact on ancient woodland and biodiversity, with significant concerns regarding Fiddlers Wood. • Conflict with the Neighbourhood Plan, including objections that the site lies outside the village envelope. • Flood risk and drainage concerns, including impacts on watercourses, surface water runoff towards Fiddlers Wood, and the need for further detailed assessment and SuDS requirements. • National Highways state A12 J26 is currently operating very close to capacity and is not capable of accommodating additional growth without significant intervention.
PEP9	Bullbanks Farm	<ul style="list-style-type: none"> • Support for the allocation from some respondents, citing site availability, deliverability, good strategic road access, lack of constraints and contribution to local economic growth and job creation. • Questions over the need and justification for employment land at this rural location. • A number of concerns about Highway access and traffic impacts on the A1124, including concerns about multiple new access points in close proximity, congestion and road safety, with suggestions that access should be coordinated with nearby allocations to form a single junction. • Potential heritage impacts, as the site lies within the setting of several Grade II listed buildings, with requests for a Heritage Impact Assessment to confirm suitability and identify mitigation. • Drainage and wastewater infrastructure concerns, with Anglian Water seeking consistent policy wording, surface water management measures, and a requirement that surface water is not discharged to the foul network. • Landscape and environmental concerns, including loss of open countryside, impact on the green break between settlements and perceived urbanisation of a rural area.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> Relationship with the Neighbourhood Plan and Village Design Statement, with comments that any redevelopment should align with locally agreed design principles and spatial strategy.
Fordham		
PP33	Land East of Plummers Road	<ul style="list-style-type: none"> Concerns over scale and sustainability of development, with objections that the allocation represents disproportionate growth for a small rural village and an outward expansion into open countryside, eroding settlement character and landscape. Severe highway capacity and safety issues, focused on Plummers Road and surrounding rural lanes, which are narrow, poorly maintained and subject to high traffic levels. Infrastructure capacity constraints, including limited access to services, public transport, schools, healthcare and utilities, Repeated objections that the current supporting infrastructure is inadequate or not evidenced. Heritage and landscape impacts, given the site's proximity to multiple Grade II listed buildings within an open rural setting, requiring a Heritage Impact Assessment and careful mitigation. Questions over deliverability and justification, including doubts about housing demand, reliance on future mitigation, and whether safe access, biodiversity net gain, and active travel connections can realistically be achieved. Support for strong water management and green/blue infrastructure led solutions, including SuDS, water efficiency, pollution avoidance, and safeguarding of existing wastewater infrastructure.
Great Horkesley		
PP34	Land North of Coach Road	<ul style="list-style-type: none"> Divided views with some support for the logical extension to the village but others concerned with the scale for an edge of village location.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Supporters cite delivery of market and affordable housing, public open space, play areas, and improved pedestrian and cycle links as benefits of the scheme. • Concerns that Great Horkesley lacks shops, healthcare, employment and frequent public transport, resulting in heavy reliance on private cars and unsustainable travel patterns. • Concerns about congestion on narrow rural roads, school traffic, and reliance on limited access points. Some support additional access points to improve safety and resilience, but others consider this insufficient. • Existing walking and cycling infrastructure is poor. Some respondents highlight opportunities to create new multi-user routes, while others argue connectivity deficiencies undermine sustainability. • Objections that developer contributions may be insufficient to meet infrastructure needs identified in the Infrastructure Audit. Concern that homes are being approved ahead of infrastructure delivery. • Anglian Water confirmed the site lies within the West Bergholt WRC catchment, which currently lacks capacity and has no AMP8 growth scheme, requiring phased delivery and strict drainage controls. • National Landscape Team and others object that the allocation would extend development into undeveloped countryside, harming landscape character and rural setting. • Historic England advised the site includes or affects the setting of a Grade II listed building and a Scheduled Monument, requiring a Heritage Impact Assessment and mitigation.
PP35	The Old School	<ul style="list-style-type: none"> • Heritage sensitivity is the dominant concern; the site includes two Grade II listed buildings, Historic England raises concern and requires a full Heritage Impact Assessment (HIA) to confirm suitability, mitigation and opportunities for enhancement

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Speeding on School Lane, unsafe junction with A134, HGV movements and near-miss incidents. Requests for traffic calming, speed reduction and junction improvements. • Flooding and drainage - Localised flooding at School Lane / A134 junction; requirement for SuDS, separate drainage networks and compliance with drainage hierarchy. • Poor walking and cycling provision and cumulative car dependency from nearby growth; calls for integrated active-travel improvements. • Wastewater capacity - Development reliant on wider West Bergholt WRC capacity, which is constrained; phased delivery and infrastructure upgrades required. • Cumulative impacts – Concerns that PP35 adds to cumulative traffic, infrastructure and sustainability impacts alongside PP34 Coach Road.
Great Tey		
PP36	Land at Earls Colne Road	<ul style="list-style-type: none"> • Widespread objection to the scale of 125 homes, described as excessive for a small rural village. • Concern site is poorly connected to core village services and facilities. • Repeated concerns that the proposal conflicts with the adopted Neighbourhood Plan. • Concerns about cumulative growth across multiple parishes west of Colchester and the need for a holistic assessment. • Requests for a developer-led masterplan addressing issues, prepared with parish and neighbourhood plan input. • Concerns about inadequate infrastructure (roads, water, utilities), flooding and drainage; poor transport connectivity and a highly car dependent settlement. • Concerns about increased traffic impacts on surrounding villages and the A1124. • Opportunities suggested to connect to planned long-distance cycle routes; and reducing attractiveness of country lanes for rat-running.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Equestrian groups emphasise need for multi-user public rights of way with inclusive access and consistent byway/bridleway standards. • Concern about environmental and ecological impacts and loss of agricultural land • Concerns about harm to rural historic character and the importance of conserving the undeveloped setting of heritage assets. Historic England identifies need for proforma Heritage Impact Assessment to help confirm suitability from a historic environment perspective. • Anglian Water concerns about lack of criteria relating to flood and pollution risk mitigation, SuDS, water efficiency and network capacity; separate foul and stormwater drainage required; and new clause needed relating to surface water; limited wastewater treatment capacity and may need to phase development to align with future investment plans due to limited WRC capacity. • Site promoter support for the allocation, providing opportunity to deliver a development that respects the rural character and heritage of Great Tey. Suggestions to amend policy to ensure flexibility and deliverability including a higher housing number. • Development should follow standards in the Sustainable Drainage Systems Guide for Essex.
Langham		
PP37	Land north of Park Lane	<ul style="list-style-type: none"> • Concerns that the road network around Langham is not capable of accommodating the level of additional traffic which the development of this scale will generate. Access to the A12 is also inadequate. • Repeated comments stating the scale of growth at Langham is contrary to the Plan's Spatial Strategy and settlement hierarchy. It is disproportionate and would fundamentally change the character and rural identity of Langham. • Claims that The level of growth at Langham is not supported by the Langham Parish Council's Housing Needs Survey (2025)

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Concerns that the development would need to rely on the car due to its limited access to public transport and rural location. • Significant concerns that the waste water and sewerage capacity at Langham is inadequate and cannot support the additional growth. A funded and deliverable strategy to address the water issue is needed to support the allocation. • Objections are raised due to concerns about impacts on ecology and farmland habitats. Impacts on Black Brook LoWS are of particular concern. • Objection that the development would harm long views towards the Dedham Vale National Landscape. It would also harm a number of local heritage assets. • Objection suggests that the Council has failed to discharge its duty in relation to the national Landscape and failed to comply with the Habitats Regulations. • Concerns about the capacity for education to be met and the need for sufficient education provision to be delivered to support development of 900 homes. Similar concerns are also raised with regard to other community and social infrastructure including health facilities and shops. • Views expressed that the level of infrastructure required to support development of 900 homes in this location is significant (highways, water, health, etc will make development unviable. There is a lack of a clearly defined, funded and timetabled infrastructure delivery package. • Concerns expressed about the loss of agricultural land to accommodate development • A full Heritage Assessment is required with any resultant recommendations added to the allocation policy. • Comment that the site is close to existing to Bridleways so it is important that infrastructure is designed as multi-user routes (MURs) to ensure inclusivity for all non-motorised users, at a minimum, to Bridleway status. • A claim that there is inadequate air quality evidence to support the development at Langham

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • A call for a Masterplan for the village to be required to show how the new development is integrated and connected to the existing settlement and facilities. • Request that a site of this scale will need to ensure adequate provision for outdoor sports provision is secured which may be best achieved through expansion of existing facilities. • Comment that delivery may be quicker if planning permissions allow for phased implementation ahead of an agreed of a comprehensive masterplan • Infrastructure providers including Anglian Water and Essex County Council (Education) agree to continue to work collaboratively to confirm satisfactory solutions to support the allocation for essential infrastructure needs. • Various sites suggested elsewhere as being more suitable to take some or all of the numbers from Langham.
PP38	Land opposite Wick Road	<ul style="list-style-type: none"> • Heritage concerns that PP38 requires the same level of assessment as PP37, including a full Heritage Impact Assessment due to proximity to Grade II listed buildings. • Highways and traffic objections, highlighting that Langham’s narrow rural roads (Wick Road, School Road, Moor Road, Park Lane) cannot safely accommodate additional vehicle movements from significant development. • Pedestrian and active travel safety concerns, with requests for evidence that safe, rural-character-appropriate pedestrian and cycle links can be delivered. • Sewage, drainage, and wastewater capacity issues, including repeated reports of Langham’s failing or overloaded sewer system, frequent flooding, broken pipes, and lack of planned upgrades by Anglian Water. • Objections to large-scale development, arguing that 900+ dwellings would more than double the village, overwhelm infrastructure, and fundamentally alter Langham’s rural character and landscape.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy	Summary of issues raised in representations
	<ul style="list-style-type: none"> • Criticism of non-compliance with Colchester’s modal shift strategy, stating that placing major development in a rural village contradicts sustainable transport objectives. • Concerns over landscape harm, including loss of farmland, impact on long views toward the Dedham Vale National Landscape, and harm to local footpaths, village character and the historic airfield setting. • Ecology and environmental objections, including loss of wildlife habitat, farmland, and green spaces that form the village’s rural setting. • Requests for clear phasing and deliverability evidence, especially around wastewater treatment capacity, pedestrian access, and other infrastructure required to support development. • Road safety issues at key junctions, including the Wick Road/A12 junction described as dangerous, fast-moving, and an accident hotspot. • General infrastructure capacity concerns, including pressure on water supply, power reliability, and local services such as education and village facilities. • Equestrian access requirements, stressing that local routes must be designed as multi-user paths suitable for horse riders, given the rural location and existing bridleways. • Comments from utilities and statutory bodies, including Anglian Water requesting strict separation of foul and surface water systems and adherence to SuDS and drainage hierarchy principles. • Some limited support for small-scale development (around 10 dwellings) where proportionate, subject to sewerage capacity being proven adequate. • Site promoter support, indicating scope exists for more units, including via private on-site wastewater treatment solutions. • Langham Parish Council’s formal objection, stating PP38 (and PP37) fail all soundness tests.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
PEP10	Lodge Lane	<ul style="list-style-type: none"> • Direct impact on Bridleway 45 (BW45), with concerns that development could disrupt a well-used rural route for pedestrians, cyclists, and horse riders. • Requests for improved active travel links, including upgraded bridleways, enhanced cycle routes, and better connectivity to Colchester, Ardleigh, and neighbouring villages. • Drainage and surface-water management requirements, including following the Essex SuDS Guide.
Layer de la Haye		
PP39	Land at the Furze	<ul style="list-style-type: none"> • Concerns that local infrastructure is already overstretched, particularly GP capacity, school places, and the ability of the narrow rural road network to accommodate further development. • Objections that recent and ongoing developments have already placed the village under significant pressure, with residents feeling overdevelopment is occurring contrary to previous assurances. • Traffic and highway safety concerns on The Folley and surrounding lanes, which are described as narrow, poorly maintained, increasingly busy, and unsuitable for more vehicular movements. • Emphasis from equestrian users that rising traffic levels have made local roads dangerous for horse riding; calls for improved green routes, upgraded bridleways, and safe multi-user links. • Requests for development to incorporate green space, countryside access, and safe provision for walkers, cyclists, and horse riders. • Some landowners and agents object to PP39 on the grounds that their land should instead be included within the settlement boundary and allocated for housing. • Support for the allocation from the site promoters, who state the land can be delivered sustainably and are engaging with Essex Highways to improve access and reduce reliance on The Folley.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
PP40	Land West of the Folley	<ul style="list-style-type: none"> • The Folley is a narrow, bendy rural lane with no pavements and deteriorating verges, considered unsafe for additional traffic, pedestrians, and horse riders. • Views expressed indicating a feeling of cumulative overdevelopment, with residents emphasising that 70+ homes already under construction will create significant impacts that should be assessed before any further allocations. • Many state the Council previously promised no major further development before 2033, causing frustration and loss of trust. • Local infrastructure is overstretched, including GP capacity, school places, and road capacity, making further homes appear unsustainable. • Concerns that the scale of development is eroding the village’s rural character, and that Layer de la Haye risks becoming an extension of Colchester. • Arguments that The Folley sites are poorly located and distant from village services, with alternative sites (e.g., Malting Green Road) promoted as more sustainable and closer to amenities. • Equestrian related concerns, with increased traffic making riding dangerous; requests for bridleway standard routes, multiuser paths, and improved offroad connectivity. • Requests for development to include green space, safe active travel routes, and improved public rights of way to support walkers, cyclists, and horse riders. • Site promoters state the PP40 site is deliverable, that The Folley can safely accommodate traffic for 50–60 homes, and that an access to Essex Design Guide standards is achievable.
Rowhedge		
PP41	Rowhedge Business Park	<ul style="list-style-type: none"> • Concerns that local infrastructure is already overstretched, especially the village primary school and Rowhedge Surgery, both described as full or unable to cope with existing demand.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • The access onto Fingringhoe Road (60mph, poor visibility, no footpath) is widely regarded as dangerous for vehicles and pedestrians, with references to past serious/fatal accidents and deteriorating road conditions. • The site is seen as isolated from the village, with no safe pedestrian route to Rowhedge and reliance on a fast rural road for access. • Concerns that development will displace existing businesses, leading to loss of local employment opportunities and eroding the role of the site as a functioning business park. • Multiple comments highlight sewage capacity, groundwater issues, and environmental concerns, including references to pollution in the River Colne and existing problems with drainage. • Calls for improved active travel connectivity, including suggestions for exploring a cycle/foot bridge to Wivenhoe and upgrading the Rowhedge Trail and protection and enhancement of Bridleway 32. • Some argue the development would appear as a poorly integrated “spot” on the edge of the village, exacerbating recent changes to village character from other new schemes. • Site promoters state the location is deliverable, with viable access arrangements and capacity for at least 50 homes.
West Bergholt		
PP42	Land at White Hart Lane	<ul style="list-style-type: none"> • Some support (including WBPC with some amendments) for this site in preference to others in West Bergholt. • Highway capacity and traffic impacts, with concerns that existing roads (including Argents Lane, Chitts Hill and the railway crossing) are already congested and would be unable to accommodate additional development without significant mitigation.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Environmental and landscape constraints, including impacts on ancient woodland, loss of orchard land, and the need for adequate buffers and protection of irreplaceable habitats. • Heritage impacts, due to the site’s location within the setting of several listed buildings, requiring a Heritage Impact Assessment and appropriate mitigation. • Wastewater and utilities capacity concerns, particularly in relation to the ability of the Water Recycling Centre to accommodate additional development and the need for phasing and safeguards. • Access, layout and design considerations, including concerns over access via private roads, the relationship with surrounding development, and the need for detailed masterplanning. • Requests for supporting infrastructure and community provision, including education, healthcare, road safety, open space, and active travel connections. • Concerns over coalescence with Colchester
PP43	Land North of Colchester Road	<ul style="list-style-type: none"> • Some support (including WBPC with amendments to policy) for this site in preference to others in West Bergholt. • Highway safety and access concerns, particularly the suitability of access arrangements, reliance on private or constrained roads, construction traffic impacts, and cumulative traffic effects on Colchester Road and surrounding streets. • Infrastructure and service capacity constraints, including pressure on schools, healthcare, utilities and wastewater treatment, with repeated concerns that existing provision cannot support further growth. • Drainage, flooding, and water management issues, including surface water flooding risks, impacts on the local water table, and the need for robust SuDS and confirmation of wastewater capacity.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Environmental and landscape impacts, including loss of wildlife habitat, effects on trees and green space, and concerns about erosion of village character and rural setting. • Scale, density, and housing need concerns, with objections that the number of dwellings is disproportionate to West Bergholt, questions over local demand, and potential overdevelopment. • Design and amenity impacts, including overlooking, loss of privacy, building height adjacent to existing homes, and the need for sensitive layout and phasing. • Cumulative impact of multiple allocations, with concerns that combined development in and around West Bergholt would fundamentally change the character of the village and strain infrastructure. • Requests for improved walking, cycling, and equestrian connectivity, to reduce car reliance and support safer, more sustainable travel.
PP44	Land off Colchester Road	<ul style="list-style-type: none"> • Objections (including WBPC) relating to coalescence and settlement separation. • WBPC object but if successful have made an number of amendments to the policy. • Concern that the allocation would erode the countryside gap between West Bergholt and Braiswick.. • Landscape, visual and character impacts, including the prominence of development on elevated, sloping land, loss of rural character, and harm to sensitive landscape transition areas identified in earlier appeal decisions. • Conflict with previous appeal decisions and neighbourhood planning, with repeated references to the site having been refused at appeal and concerns that the allocation is inconsistent with adopted neighbourhood plan policies. • Infrastructure and capacity constraints, including pressure on highways, education, healthcare, and wastewater infrastructure, and objections that no credible or costed delivery strategy has been demonstrated.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> Heritage considerations, due to proximity to the Grade II listed Truman's Brewery complex and the wider historic setting, requiring a detailed Heritage Impact Assessment and mitigation. Residential amenity impacts, including loss of privacy, overlooking, and visual intrusion for existing properties adjoining the site. Active travel and countryside access considerations, with requests to improve walking, cycling and equestrian connectivity as part of any development.
PEP11	Land at Pattens Yard	<ul style="list-style-type: none"> Heritage constraints, due to the site's potential impact on the setting of the Pitchbury Ramparts Scheduled Monument and nearby Grade II listed buildings, requiring a Heritage Impact Assessment and appropriate mitigation. Compatibility with existing rural uses, particularly the need to safeguard the operation of the adjacent stables and protect the safety and continuity of Public Footpath 4 and countryside access. Infrastructure and utilities considerations, including the absence of existing gravity sewer connections, the need for on-site wastewater and surface water management, and safeguarding of existing Anglian Water assets. Access, movement and active travel, with requests for improved walking, cycling and equestrian connectivity and careful design to avoid conflicts between employment traffic and non-motorised users. Support for employment use and deliverability, with representations confirming the site is available, suitable and capable of delivering local jobs and supporting the rural economy within the plan period.
Aldham		
PP45	Land off New Road	<ul style="list-style-type: none"> Heritage concerns due to location opposite Grade II* Church of St Margaret and St Catherine. HIA required to confirm site's suitability from a historic environment perspective and identify appropriate mitigation.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Objection to scale of site, which is capable of accommodating more than the 15 homes referred to in Policy. Assurances are sought that permission will not be given for more than 15 dwellings. • Objections that growth in this location is unjustified; unsustainable location for housing growth; lack of services and infrastructure. • Comments on cumulative impact of large developments in Marks Tey and Eight Ash Green on transport infrastructure. • Anglian Water note lack of criteria to mitigate flood and pollution risks, manage surface water, improve water efficiency and ensure wastewater treatment capacity. Developer should engage with Anglian Water to confirm a sustainable sewer connection. • Development should adhere to the standards set out in the Sustainable Drainage Guide for Essex. • Site promoter supports allocation, which is deliverable and policy requirements can be achieved.
Birch and Layer Breton		
PP46	Land at Birch Green	<ul style="list-style-type: none"> • Concerns that Birch lacks essential services, with no village shop, no medical facilities, an oversubscribed primary school, and poor public transport, making additional housing appear unsustainable. • The access route (Greenfield Houses / Mill Lane) is described as narrow, constrained, single-track in places, unsuitable for two-way traffic, and unsafe for emergency vehicles, pedestrians, and children using the adjacent play area. • Several residents highlight existing flooding and drainage problems, stating that road drainage already fails during moderate rainfall and that development would worsen local flooding issues. • Objections regarding harm to wildlife and biodiversity, with repeated references to tawny owls, bats, deer, great crested newts, barn owls, red kites, buzzards, and dormice using the site and surrounding woodland as habitat.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> Concerns that 15 homes represent overdevelopment for a very small rural village, setting a precedent for further countryside encroachment and conflicting with conservation expectations for the Roman River Valley area. Heritage considerations raised by Historic England, noting proximity to two Grade II listed buildings and the need for a Heritage Impact Assessment to define acceptable mitigation. Equestrian groups emphasise that Birch has a strong horse riding community, calling for multiuser routes, protection of Restricted Byway 41, and safer green infrastructure connections for walkers, cyclists, and riders. Infrastructure concerns include narrow roads, lack of pavements or streetlighting, no gas supply, and anticipated disruption from construction traffic on constrained lanes. Some respondents argue that small villages like Birch, with minimal existing services, are inherently unsuitable for growth under Policy ST3, and that housing should be directed to more sustainably located settlements. Support from the landowner emphasising deliverability, policy alignment, and the site's potential to provide appropriately scaled housing that respects local character.
Fingringhoe		
PP47	Land at Picketts Farm	<ul style="list-style-type: none"> Objection to housing in Fingringhoe citing previous refusal (application 192686), with concerns repeated including odour, noise, flies, proximity to livestock buildings, asbestos roofing, and general unsuitability of the site for housing. Widespread concern that Fingringhoe is a non sustainable settlement with no shops, very limited services or facilities, minimal public transport, no pavements, and poor pedestrian connectivity. Several respondents argue the development conflicts with the Fingringhoe Housing Needs Survey, which identifies need only for affordable housing, not market housing.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<ul style="list-style-type: none"> • Significant issues raised about highway safety, including narrow country lanes, no passing space, high farm vehicle movements, lack of footways, and dangerous access onto Church Road. • Multiple representations highlight sewage treatment constraints, with councillor noting no spare capacity for additional homes for at least five years. • Strong concerns about environmental and landscape harm, including impacts on the Roman River Valley, protected species and habitats, hedgerows, wider biodiversity, and valued long distance views (including from Wivenhoe and Rowhedge). • Views expressed about fears of ribbon development and erosion of the separation between Fingringhoe, Langenhoe, and Abberton, contributing to loss of rural character. • Concerns that the development would undermine village identity, harm rural amenity, and alter the historic, tranquil, and scenic qualities that attract visitors. • Safety concerns raised about Church Road as the sole access and evacuation route for the eastern part of Fingringhoe, with risks highlighted in the event of wildfire or emergencies. • Objections to loss of privacy for existing and future residents due to proximity to existing farm buildings and neighbouring homes. • Equestrian groups request protection and enhancement of bridleways and active travel links, with multi-user green infrastructure appropriate for horse riders.
Messing		
PP48	Kelvedon Road	<ul style="list-style-type: none"> • Concern that level of housing proposed is not required given evidence from Messing Housing Needs Survey • Surrounding narrow roads and lanes are already unsafe for vehicles/pedestrians and this would be worsened by increased traffic volumes from the site, from proposed allocations nearby (e.g. PP19). Concern also about impact on surrounding roads,

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy		Summary of issues raised in representations
		<p>including B1023 to Inworth, especially given A12/A120 widening cancellation which may lead to more diverted traffic through the village.</p> <ul style="list-style-type: none"> • Site would be car dependent as village has extremely limited public transport service and surrounding roads and lanes are unsuitable/unsafe for walking and cycling. • Concern that development may impact upon conservation area and listed buildings and that further assessment required through a full Heritage Impact Assessment • Limited sewage treatment capacity at local pumping station which has operational issues • Site has had surface water flooding issues, as has the village, and there is concern development could exacerbate these issues (previously mitigated by works by ECC) • Messing has limited services, infrastructure and facilities (e.g. school places, medical facilities, data connectivity) to support increased growth • Requests for mitigation activities to be undertaken including traffic safety measures, site specific drainage strategy and proposed area of enhanced open space to include wetland area to aid dealing with run-off/flooding.
Peldon		
PP49	Land at St Ives Road	<ul style="list-style-type: none"> • Concerns that Peldon lacks essential services, including no shop, no GP or dentist capacity, no school places, unreliable public transport, and no street lighting, creating total car dependency. • St Ives Road is described as unsafe, narrow, single-track in parts, with limited passing places, steep gradients, dangerous junctions, and no pavements—raising major highway safety concerns for vehicles, pedestrians, buses, and agricultural machinery. • Multiple representations highlight drainage and sewage capacity problems, with frequent flooding, reliance on tankers, and uncertainty around the capacity of the local pumping station.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Settlement/Policy	Summary of issues raised in representations
	<ul style="list-style-type: none"> • Widespread objections to the scale and form of development, with a 25-unit estate seen as out of keeping with Peldon’s historic linear/ribbon settlement pattern and disproportionate to the village’s size. • Many respondents object to the loss of Peldon’s historic green core, an area considered the “green heart” or “lungs” of the village, with high wildlife value and longstanding landscape significance. • Significant concerns about habitat and biodiversity loss, including reports of nightingales, lizards, bats, owls, raptors, and other wildlife using the site; several note hedgerows and trees have already been removed prior to planning. • Objections that development would increase traffic congestion and risk at the Church Road junction and along rural lanes already pressured during high tides, accidents, or B1025 diversions. • Several representations state the allocation is unsound under the NPPF, citing issues around justification, sustainability, lack of infrastructure, light pollution affecting an intrinsically dark landscape, and failure to meet locally defined housing need. • Equestrian groups request multi-user routes and inclusive green infrastructure due to the lack of safe bridleways and the presence of national-speed-limit roads used by riders. • Concern about developers having removed hedgerows and trees before any planning approval, which residents consider unacceptable and potentially unlawful. • Some believe alternative sites around Peldon are more suitable and lower impact. • Historic England are concerned about allocating this site due to its proximity to several listed buildings, particularly the Grade I Church of St Mary the Virgin. • Support from site promoter but modifications suggested to policy wording.

Officer Summary of Representations to the Regulation 18 Draft Colchester Local Plan Consultation

Chapter	Key Issues of concern raised in Representations
Monitoring	<ul style="list-style-type: none"> • Concerns were raised that some policy criteria (for example, loss of best and most versatile agricultural land) do not have corresponding monitoring indicators, limiting the ability to assess whether plan objectives are being met. • Monitoring is perceived as reactive rather than preventative; several indicators focus on recording harm after permissions are granted (e.g. approvals contrary to Environment Agency advice or biodiversity impacts), rather than providing early warning triggers to prevent damage. • One representation considers the monitoring section insufficiently detailed, raising doubts about whether the Plan can be effectively implemented, reviewed and adjusted over time. • Essex County Council requests stronger, outcome-focused monitoring on flood risk and movement. • ECC suggests that some monitoring indicators (e.g. transport, travel plans, health and amenity-related indicators) may be more effective if clearly aligned with the Place and Connectivity chapter, improving coherence across the Plan.
Appendices	<ul style="list-style-type: none"> • No representations received
Glossary	<ul style="list-style-type: none"> • Under Infrastructure definition omit 'emergency services' and include 'police, fire & rescue and ambulance facilities'

Chapter	Key Issues of concern raised in Representations
Sustainability Appraisal (SA)	<ul style="list-style-type: none"> • Concerns that the SA does not accurately assess major site allocations, with several respondents citing overly positive scoring, outdated evidence, missing surveys, and unrealistic assumptions about infrastructure capacity and sustainable travel. • Objections that significant environmental and landscape impacts—particularly around Langham, Dedham Vale, Bullock Wood, and designated coastal sites—are understated, with insufficient consideration of biodiversity, hydrology, protected species, and cumulative effects. • Criticism that key infrastructure constraints (wastewater treatment, highways, schools, healthcare, utilities) are not reflected realistically in SA findings, with several respondents stating that planned mitigation is unproven or undeliverable. • Challenges to the SA methodology, including concerns about flawed sustainability metrics (e.g., SA4 transport scoring), gaps in cumulative assessment, and lack of alignment with emerging national tools such as the DfT Connectivity Tool. • Objections from rural and island communities (e.g., Mersea, Wakes Colne) that the SA fails to recognise local constraints, community pressures and the effects of large-scale growth on settlement character, traffic, and service availability. • Comments from statutory bodies and technical consultees highlighting missing assessments (e.g., MCZ and shellfish waters), risks to designated sites, and concerns about the treatment of MOD operational land within the SA. • Some support received where respondents consider the SA to provide a robust assessment for certain site allocations, though often accompanied by requests for continued refinement as evidence evolves.