

**Eight Ash Green Regulation 16 Schedule of Representations**

<b>Respondent</b>	<b>Obj/Sup/Com</b>	<b>NP Section</b>	<b>Representation</b>
Natural England	Comment	Introduction	<p>The Eight Ash Green neighbourhood plan follows previous consultation with Natural England on the Colchester Local Plan. At this time Natural England advised that the emerging strategic solution, the Essex Coast Recreational Avoidance and Mitigation Strategy (Essex RAMS) is a key consideration in the context of the Habitats Regulation Assessment. The Essex RAMS seeks to mitigate the recreational impacts as a result of new development, in-combination with other plans and projects within the Zones of Influence (Zol). We would direct you to Natural England's most recent letter to your Local Planning Authority, reference 244199 (dated 16 August 2018) for further guidance on the Essex RAMS in the interim period.</p> <p>Natural England previously commented on the Eight Ash Green Neighbourhood plan through the letters dated 12 April 2018 (reference 239098), however we note that the position on neighbourhood plans falling within the strategic solution has since changed.</p>
Natural Englang	Comment	Introduction	<p>The Eight Ash Green Parish falls in its entirety within the Zol of the Essex Coast RAMS and it is our understanding that 150 dwellings are allocated within the plan area. There is therefore residential development within the parish area which will be subject to the requirements of this strategic solution. This will be in accordance with the RAMS supplementary planning document once adopted.</p> <p>In addition to the allocated development, any windfall applications which would be in excess of what has been assessed in the Neighbourhood Plan Habitats Regulation Assessment (HRA), would need to be subject to their own, project level HRA.</p>
Hopkins Homes represented by Pegasus Group	Object	Introduction	<p>In Section 1 of the Basic Conditions Statement the SNP is considered against the 2012 NPPF. This was superseded by the NPPF of July 2018 and more recently the NPPF of February 2019. Whilst the most recent NPPF could not have been considered, and is largely similar to the 2018 NPPF, there was clearly a policy shift between the first and second NPPFs that the SNP has</p>

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			<p>not been considered against.</p> <p>As the SNP process has not been assessed against the most recent NPPF my client believes that the SNP conflicts with Basic Conditions A.</p>
Gladman Developments Ltd	Support	Introduction	<p>This letter provides Gladman’s representations to the submission version of the Eight Ash Green Neighbourhood Plan (EAGNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Gladman has considerable experienced in Neighbourhood Planning, having been involved in the process across the country. It is from this experience that this representation has been prepared.</p> <p>Gladman are the promoters of the Fiddlers Field, Site 226 (land off Halstead Road, Eight Ash Green. The EAGNP allocates the site 150 residential dwellings and includes supporting policies dealing with density, housing mix, accessibility and infrastructure.</p> <p>Gladman commend the community’s positive approach to the neighbourhood plan and have submitted an outline application (Reference: 175129) in line with the policy proposals within the EAGNP to demonstrate deliverability of this site. This application is supported by a full suite of technical documents demonstrating the sites suitability for residential development, available through the Council’s website.</p> <p><u>Legal Requirements</u></p> <p>Before a Neighbourhood Plan can proceed to referendum it must be tested against a set of basic conditions defined in Paragraph 8(2) schedule 4b of the Town and Country Planning Act 1990 (as amended) by way of independent examination. The basic conditions that the EAGNP must meet are as follows:</p>

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			<p><i>(a) Having regard to national policies and advice contained in guidance issued by Secretary of State, it is appropriate to make the order.</i></p> <p><i>(d) The making of the order contributes to the achievement of sustainable development.</i></p> <p><i>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</i></p> <p><i>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.</i></p> <p><u>National Planning Policy</u></p> <p>On the 24th July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework (NPPF). The first revision since 2012, it implements 85 reforms announced through the Housing White Paper. This version of the NPPF was itself superseded on the 19th February 2019, with the latest version, largely only making alterations to the Government’s approach for the Appropriate Assessment as set out in Paragraph 177 of the NPPF.</p> <p>Paragraph 214 of the 2019 NPPF sets out the transitional arrangements for the implementation of revised national planning policy. Paragraph 214 confirms that development plan documents submitted on or after the 24th January 2019 will be examined against the revised NPPF. Given that the EAGNP was submitted before the 24th January 2019, the comments provided within this representation reflect the national policy requirements as previously defined by the 2012 version of the NPPF.</p> <p>Paragraph 184 of the NPPF makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should</p>

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			<p>ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.</p> <p><u>Relationship to the Local Plan</u></p> <p>To be found in accordance with the Basic Conditions, Neighbourhood Plans should be prepared to conform to the strategic policy requirements set out within the adopted Development Plan. The adopted Development Plan relevant to the preparation of the EAGNP is the Colchester Core Strategy 2001- 2021, adopted in 2008. This plan was subject of a Focussed Review adopted in 2014 which sought to amend policies no longer in compliance with the National Planning Policy Framework, following its publication in 2012. Following adoption of the Focussed Review Colchester Borough Council started preparing a new Local Plan for Colchester in 2015. This plan was submitted to the Planning Inspectorate for Examination in Public in October 2017. The two sections of the Local Plan will be examined separately with Section One currently being subject to a joint examination with the neighbouring authorities of Braintree and Tendring. Section One includes strategic policies covering housing and employment, requirements and proposals for new Garden Communities.</p> <p>Section Two will not be examined until the completion of the examination in to the joint Section One plan. This examination is currently subject to a significant delay following a letter published from the Inspector to the North Essex Authorities (NEA) setting out his interim findings. Substantial further work is necessary to support the identification of the Garden Communities.</p> <p>Section Two of the Colchester Local Plan sets a housing target for Eight Ash Green, supporting the delivery of this through this neighbourhood plan and includes a specific policy on what else is expected from the EAGNP. Policy</p>

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			<p>SS5: Eight Ash Green of the submission Colchester Local Plan expects the EAGNP to define a new Settlement Development Boundary for Eight Ash Green, allocate a site for 150 dwellings and include associated policies to guide this development and other development in Eight Ash Green. Gladman are supportive that the EAGNP is progressing, with the draft policies aligned with the emerging Local Plan where possible to ensure conflicts are minimised, should planning policies in the Local Plan Part 2 be amended through the examination.</p> <p><u>Neighbourhood Plan Policies</u> Gladman have no specific comments to make in relation to the individual planning policies making up the EAGNP. We welcome and support changes that were made to the document in light of our Regulation 14 consultation response. We reiterate the deliverability of the Fiddlers Field, referencing our pending application currently on the site.</p> <p><u>Conclusions</u></p> <p>Gladman recognises the role of Neighbourhood Plans as a tool for local people to shape the development of their local community. In light of the current local planning position in the authority Gladman support the community and steering group in pressing ahead in producing the EAGNP.</p> <p>Gladman hope that the comments made within this representation have been found to be helpful and constructive to aid the appointed examiner in the upcoming examination. Should the examiner deem it necessary to hold a hearing session in public to discuss the neighbourhood plan Gladman request that we are given the opportunity to appear at any session(s).</p>
Highways England	Comment	Introduction	Thank you for your consultation. The plan is a level down from the broader Colchester local plan as such impacts on the Strategic Road Network should be taken account in their evidence base. There is significant growth pressures

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			on A12 J26 and these will need to be adequately mitigated as development comes forward. Therefore, we have no comment to make on the plan.
Telent	Comment	Introduction	Our client's apparatus, Teliasonera, is not located within the vicinity of the above reference and we therefore have no further interest in this current location.
Babergh & Mid Suffolk District Councils	Comment	Introduction	Thank you for consulting Babergh & Mid Suffolk District Council on the submission draft version of the Eight Ash Green N'hood Plan. I can confirm that we have no comments to make.
Forestry Commission	Comment	Introduction	<p>Thank you for consulting the Forestry Commission, unfortunately we do not have the resources to respond to Neighbourhood plans.</p> <p>If you have ancient woodland within your boundary to consider the Forestry Commission has prepared joint standing advice with Natural England on ancient woodland and veteran trees which we refer you to in the first instance. This advice is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It also provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees.</p> <p>The Standing Advice website will provide you with links to Natural England's Ancient Woodland Inventory, assessment guides and other tools to assist you in assessing potential impacts. The assessment guides sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland.</p>
Historic England	Comment	Introduction	<p>Thank you for your correspondence dated 23 January 2019 inviting Historic England to comment on the Regulation 16 Submission version of the Eight Ash Green Neighbourhood Plan.</p> <p>Aside from congratulating those involved, we do not wish to provide detailed comments at this time. We would refer you to our detailed advice on</p>

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			<p>successfully incorporating historic environment considerations into neighbourhood plans, which can be found here: <a href="https://historicensland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicensland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a></p> <p>I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed NP, where we consider these would have an adverse effect on the historic environment.</p>
Natural England	Support	Vision Statement & Key Issues	Natural England welcomes acknowledgement that biodiversity within the parish are is a key issue that requires consideration. Natural England would advise that this wording be strengthened to refer to the requirement to maintain and enhance the natural environment, in accordance with policies 118, 170 & 174 Of the National Planning Policy Framework (2019).
Colchester Borough Council	Comment	Background (para. 5.3)	Paragraph 5.3 contains a typing error in the title. This should be updated to "Neighbourhood".
Colchester Borough Council	Comment	Background (para. 5.4)	Paragraph 5.4 has an incorrect reference to the Emerging Local Plan extract regarding Eight Ash Green Neighbourhood Plan. This should be updated from 6.161 to 14.160.
Edward Gittins	Object	Future Provision of Additional Housing in the Village	<p>My representations are general rather than relating to any particular section of the NP.</p> <p>In the absence of a sound Section 1 Local Plan and in advance of an examined Section 2 Plan, it is difficult to know how compliant the proposals in this NP are likely to be with the LP in its ultimately adopted form. Faced with the level of housing commitments which the Borough must absorb in the period up to 2033, the contribution envisaged at EAG seems derisory, especially when one considers the geographic relationship of this village to</p>

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			<p>Colchester and its accessibility to the main road and rail transportation corridors. As things stand at present, with the emerging LP incomplete and delayed, the draft LP does not provide the necessary context to allow firm decisions and commitments to be made at the local level. Thus whilst I commend the attempt to provide more certainty for the future of EAG, this is not robust without appropriate context in the form of the LP.</p> <p>The emerging LP relies substantially on proposed garden communities to deliver housing outside the main built-up area of Colchester although this strategy is yet to be demonstrated as sustainable and alternative strategies must be sustainably appraised alongside the new garden communities. One such alternative is found in my own “Alternative Growth Strategy for North Essex” which proposes, inter alia, the controlled expansion of Key Satellite Villages and Primary Transport Corridor Villages around Colchester; EAG falls into both of these Classifications and hence this is a strong indicator that it is a sustainable location for future growth. Whilst this strategy does not quantify as yet the exact scale of future growth which would be directed to Key Satellite Villages and Primary Transport Corridor Villages, it does envisage these should play a significant role in relocating the 7,500 dwellings earmarked for the new garden communities by 2033. At least some of this large tranche of housing could be expected to be found at EAG.</p> <p>In coming forward with limited growth proposals for EAG, the NP has paid scant regard to the role it could and I believe should play in meeting wider housing requirements in North Essex generally and in Colchester Borough in particular. “The Alternative Growth Strategy for North Essex” identifies opportunities to create a coherent expanded community at EAG focused on a new village centre and featuring a major open space link between Fordham Heath and Seven Star Green as well as improved public transport services to Colchester and Halstead.</p>



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			<p>Whilst I fully understand the aspirations of the local community to either limit or resist change, that strategy must be tested against the wider needs of society and the strategic attributes of EAG as a focus for future housing. Seen in the context of a ring of Key Satellite Villages maintained as free-standing settlements but linked to Colchester by improved bus services, EAG could be expected to absorb a substantial number of new village houses associated with additional investment in community services.</p> <p>The proposals in the NP do not therefore adequately reflect the wider context and opportunities with regard to housing needs and sadly reflect an unacceptably conservative approach to planning the village's future.</p>
<p>James &amp; Philips French represented by Foxes Rural Consultants</p>	<p>Object</p>	<p>Future Provision of Additional Housing in the Village</p>	<p>Please find a consultation set out below on behalf of James and Philip French in respect of the Eight Ash Green Neighbourhood Plan.</p> <p>We write in support of the Eight Ash Green Neighbourhood Plan.</p> <p><u>Introduction</u></p> <p>This consultation is made by the owners of the land identified on the attached plan titled Land South of A1124 Halstead Road, Development Masterplan Option 2.</p> <p>Part of the land shown on the Masterplan is identified under Site 155 under the Eight Ash Green Neighbourhood Plan v15. (EAGNP). However, this Masterplan was actually the option consulted upon through the consultation process for the Neighbourhood Plan, as explain further in the Background section below.</p> <p><u>Background</u></p> <p>Site 155 was one the nine sites put forward in the original Call for Sites exercise.</p>

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			<p>Site 155 was submitted as part of the Colchester Borough Council Call for Sites during the collation of the Local Plan evidence base. Since the site was submitted, the Eight Ash Green Parish have been working on drafting a Neighbourhood Plan.</p> <p>As part of the Neighbourhood Plan consultation process, we were in discussions with the Neighbourhood Plan Group (NPG) about alternative options to the area submitted as part of the Call for Sites, since we are in ownership of a wider land holding to that presented as part of the Call for Sites.</p> <p>Three options were presented to the NPG for consultation:            Option 1 - the site shown as Site 155 in the Call for Sites Plan which was considered too small;            Option 2 - the attached Masterplan which could accommodate the proposed housing allocation of 150 houses for Eight Ash Green;            Option 3 - shows a split allocation between Site 155 and the preferred site under the draft Neighbourhood Plan - Site 225;            Reference Section 66 of the Consultation Statement dated 16th November 2018.</p> <p>All Options were presented to the NPG, although only Option 2 was consulted on.</p> <p>The Option 2 Masterplan was voted as the reserve site following the public consultation exercise by the NPG.</p> <p><u>Representation</u>            We propose a section is included in the EAGNP v15 that the Option 2 Masterplan is identified as the reserve site, in the event that Eight Ash Green</p>

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			<p>is expected or requested to increase its housing allocation above 150 units through the Local Plan Period.</p> <p>We have outlined our reasoning below:</p> <p>Voted as the Second Choice Site through the EAGNP Consultation Process</p> <p>Allocating the land as a reserve site will assist in protecting the village from applications on land which has not been voted for by the residents. Our land has been through an extensive consultation process undertaken by the NPG. Residents voted for the land as the second choice site for the proposed 150 unit allocation.</p> <p>The land also has the ability to integrate with Site 226 should a greater allocation be required over the Plan period.</p> <p>Compliance with EAGNP Vision and Objectives The land is located on the edge of the village, opposite Site 226 where the 150 unit allocation is proposed. Allocation of housing on the land would therefore not impact on the village being able to continue to enjoy its open spaces (Policy DH1). The land would also not impact on the protection of the green open spaces (Policy EP2), with the retention and protection of these spaces a key message through the EAGNP. If the land was developed, the village would be able to retain its distinct open character.</p> <p>Development of the land would also not cause coalescence with neighbouring settlements (Policy EP1 &amp; EP2). In particular, it is the other side of the village to Stanway, where coalescence is a notable concern.</p> <p>The land is not in an area of Flood Risk (Policy EP5) and is currently open arable land without trees or hedgerows across it. There would need to be the</p>

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			<p>removal of some landscaping to facilitate the entrance onto the A1124. Footpaths, cycle ways and bridleways (Policy EP4) could be incorporated into the scheme to create high quality and sustainable housing development.</p> <p>Colchester Borough Council Garden Communities Colchester Borough Council are facing challenges through the Examination of the proposed Local Plan, particularly in respect of the proposed Garden Communities. The financial viability of the proposals has been identified as a key issue through the initial stages of Examination.</p> <p>Colchester Borough Council has allocated a significant proportion of its overall proposed housing allocation through to the Local Plan period to the Garden Communities. Should these proposals not be found sound, an alternative option could be to ask settlements within Colchester Borough to increase their allocations in order to accommodate housing requirements. Being a close distance to Colchester and with strong transport links, Eight Ash Green could be a key settlement identified for further housing allocation.</p> <p>EAGNP Strategic Environmental Assessment Report dated January 2019 The land did not score any negative environment impacts when measured against EAGNP's Strategic Environmental Objectives. <u>Infrastructure</u></p> <p>The land sits adjacent to the A1124 and will be opposite the Site 226, which proposes a new bus stops and a recreational play area. The site also has the potential to offer its own amenities as part of any proposal.</p> <p>(Attachment of proposed option 2 of site 155 included with representation).</p>
Hopkins Homes represented by	Object	Policy VSB1	My client, Hopkins Homes, have serious concerns that the submission Neighbourhood Plan (SNP) is predicated on the delivery of single site allocation and that the site selection process is fundamentally flawed. As part

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Pegasus Group			<p>of the Neighbourhood Plan process my client has previously promoted site 039, which is one of the sites that has not been included in the SNP.</p> <p>Polices VSB1 and FF1 essentially deliver the same outcome, which is the accommodation of the 150 dwellings that are proposed to be allocated to the village through the emerging Colchester Borough Local Plan 2017 to 2033 (ELP), at a single site to the far west of the village. This site was originally identified as site 226 and is known as Fiddlers Field.</p> <p><u>Site Selection Process</u></p> <p>The Neighbourhood Plan Call for Sites process included an assessment of the 10 sites that came forward based on a Checklist of 31 criteria. Criterion 24 of the <i>Call for Sites Assessment Checklist</i> looked at how many existing properties would be affected by close proximity to the site and how. Paragraph 7 of the <i>Site Selection Process</i> document identifies that residents attached significant weight to minimising disruption with existing housing when assessing sites. This factor together with the offer of a relief road for Wood Lane clearly influenced the allocation of the Fiddlers Field site on the far west of the village.</p> <p>Criteria 25 to 29 of the Checklist looked at the proximity of sites to schools, retail and health services. However, there is no criterion in the Checklist that looks at the proximity of sites to places of employment. Given that travel to work is a key generator of traffic the fact that the site selection process did not consider this important factor calls into question the robustness of the selection process.</p> <p>The ranking exercise for sites 039 and 226 was heavily based on traffic impacts, with site 226 being considered to reduce impacts through the proposed 'relief road' and work to the A1124. Site 039 was considered to result in localised traffic impacts through using The Walk as its main vehicular</p>

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			<p>access. Whilst site 226 was considered positively as it is near to the school and shops any dwellings on site 039 would be similar distance from both the primary school and village shops. Though the ranking process did not take this into account, neither did it take into account proximity to wider retail facilities to the east of Eight Ash Green in Colchester.</p> <p>The <i>Neighbourhood Plan Group site assessments</i> table in Annex P of the <i>Site Selection Process</i> document shows that site 039 failed to meet two of the four Primary Criteria due to the lack of highway access onto the A1124 and loss of open views. It is only the sites that were considered to meet all the Primary Criteria that were then assessed against the Secondary Criteria. At this point the remaining sites were then considered with regards to their proximity to village services and facilities.</p> <p>The table below shows that on all counts site 039 performs better than site 226, other than proximity to the primary school, where site 226 is presently only 0.09km nearer.</p> <table border="1" data-bbox="825 927 1698 1304"> <thead> <tr> <th colspan="3">Secondary Assessment Criteria 5 to 10</th> </tr> <tr> <th></th> <th>Site 039</th> <th>Site 226</th> </tr> </thead> <tbody> <tr> <td>Proximity to primary school</td> <td>1.15km</td> <td>1.06km</td> </tr> <tr> <td>Proximity to secondary school</td> <td>2.63km</td> <td>3.45km</td> </tr> <tr> <td>Proximity to doctor's</td> <td>2.06km</td> <td>2.85km</td> </tr> <tr> <td>Proximity to pharmacy</td> <td>1.74km</td> <td>2.56km</td> </tr> <tr> <td>Proximity to supermarket</td> <td>1.74km</td> <td>2.56km</td> </tr> <tr> <td>Proximity to bus stops</td> <td>Adjacent (A1124)</td> <td>50m (Fiddlers Hill) 200m (A1124)</td> </tr> </tbody> </table> <p>It is also noted that site 39 also outperforms site 226 in respect of the travel distance to the other facilities in the village listed that are below.</p>	Secondary Assessment Criteria 5 to 10				Site 039	Site 226	Proximity to primary school	1.15km	1.06km	Proximity to secondary school	2.63km	3.45km	Proximity to doctor's	2.06km	2.85km	Proximity to pharmacy	1.74km	2.56km	Proximity to supermarket	1.74km	2.56km	Proximity to bus stops	Adjacent (A1124)	50m (Fiddlers Hill) 200m (A1124)
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			<table border="1" data-bbox="825 305 1698 586"> <thead> <tr> <th></th> <th>Site 039</th> <th>Site 226</th> </tr> </thead> <tbody> <tr> <td>Proximity to public house</td> <td>0.8km</td> <td>1.77km</td> </tr> <tr> <td>Proximity to allotments</td> <td>0.48km</td> <td>1.44km</td> </tr> <tr> <td>Proximity to sports pitches</td> <td>0.96km</td> <td>1.93km</td> </tr> <tr> <td>Proximity to site of new community facility</td> <td>0.16km</td> <td>1.12km</td> </tr> </tbody> </table> <p data-bbox="825 626 1917 987">The second criterion of the <i>Single Strategic Site</i> table in Annex Q of the <i>Site Selection Process</i> document states that ‘<i>The Site must have direct access on to the A1124</i>’. This is clearly a factor why site 039 was rejected. The accompanying remarks state that “<i>150 houses additional houses potentially means 300 cars + entering or leaving the Site</i>”. Such a statement demonstrates that little consideration was given to the transport modelling that would be carried out to support any detailed proposals. This modelling would demonstrate that vehicular movements from a development site would be dispersed throughout the day and that not all residents would use private motor vehicles to meet their daily travel needs.</p> <p data-bbox="825 1027 1917 1317">To the layman considering the proposed sites a statement that 300 cars + would enter and leave the site is misleading and would have clearly influenced residents’ decisions on what site to vote for. There is no evidence that the positive impact that travel planning could have in generating a modal shift away from private car use, especially in sites like 039 where existing public transport routes are in place and a greater number of services, facilities and employment opportunities would be within walking and cycling distance of the new dwellings.</p> <p data-bbox="825 1357 1917 1425">After reviewing the evidence base for the SNP it is clear that through the site selection process significant weight was given to minimising the impact on</p>		Site 039	Site 226	Proximity to public house	0.8km	1.77km	Proximity to allotments	0.48km	1.44km	Proximity to sports pitches	0.96km	1.93km	Proximity to site of new community facility	0.16km	1.12km
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			<p>existing residents, rather than considering the most sustainable location for the new dwellings to be located. The fact that none of the four Primary Criteria related to the sustainability of sites meant that my client's site was not then considered against the Secondary Criteria, where it outperformed site 226.</p> <p>Clearly this approach is at odds with the aim of achieving sustainable development through minimising vehicular traffic from new development as limited weight has been given to sustainable travel to village facilities and employment through this process. In fact, there is a distinct absence of robust technical evidence to adequately assess the travel impact of new residents. Instead the allocation is based on limiting the impact of new development and existing traffic on the village.</p> <p>Basic Condition A of Schedule 4B of the Town and Country Planning Act 1990 requires a Neighbourhood Plan to have regard to national planning policies and guidance. In this case the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG). The NPPF and NPPG place great emphasis on the importance of achieving sustainable development with paragraph 7 of the NPPF identifying that the purpose of the planning system is to contribute to the achievement of sustainable development. Indeed, achieving sustainable development is also Basic Condition D in preparing a Neighbourhood Plan. Paragraph 32 requires that significant adverse impacts on the three objectives of sustainable development should be avoided and wherever possible, alternative options which reduce or eliminate such impacts should be pursued.</p> <p>The decision not to allocate my client's site has not taken into account the benefits of delivering sustainable development in accordance with Paragraphs 7, 8 and 9 of the NPPF. This is specifically with regards to encouraging sustainable travel to the employment and retail areas of Colchester and the existing and proposed community facilities of the village.</p>



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			<p>In both cases the Fiddlers Field site offers less opportunities to encourage sustainable travel as a result of its location to the far west of the village.</p> <p>In light of the above the SNP is in conflict with Basic Conditions A and D as it would not result in the most sustainable site being allocated for the delivery of new housing in Eight Ash Green. This would be a clear conflict with the policies of the NPPF and the need to deliver sustainable development.</p>
Colchester Borough Council	Support	Policy VSB1	<p>It is unclear from the current map provided the extent of the revised settlement boundary as the colour is not distinctive and it appears that an area that is proposed for removal is shown in a darker grey, but no key is provided to clarify this. The map should be updated to show only the revised settlement boundary (excluding areas removed), and this should be easily distinguishable. This is to provide clarity.</p>
Hopkins Homes represented by Pegasus Group	Object	Fiddlers Field Policy FF1	<p>Policy SG2 of the ELP identifies a borough wide need to accommodate “at least 14,720” new homes between 2017 and 2033, as such, the allocation of 150 dwellings in the ELP should be viewed as a minimum number. This approach accords with paragraph 59 of the NPPF that states the Government’s objective to significantly boost the supply of homes.</p> <p>Paragraph 33 of the NPPF states that plans are likely to require early review if local housing need is expected to change significantly in the near future. If site 226 does remain the preferred site then it is recommended that my client’s site be identified as a preferred option for the future growth of the village. Given the proximity of Eight Ash Green to Colchester it is inevitable that it is an area where growth will be directed in the future.</p> <p>Whilst Policy SS5 identifies that the allocation can be at a site or sites the Site Selection Process document demonstrates that significant weight was given to the allocation of a single site during the Neighbourhood Plan allocation process. The allocation of a single site to accommodate the requirement of at least 150 dwellings does not provide the necessary flexibility to allow for other</p>

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Respondent	Obj/Sup/Com	NP Section	Representation
			<p>residential development to be delivered elsewhere in the village if through valid design and placemaking reasons the allocation at site 226 does not come forward. Moreover, Policy FF1 does not allow any flexibility if, through the examination of the emerging Colchester Local Plan the allocation numbers were to increase.</p> <p>The selection process has given a disproportionate amount of weight to the delivery of the entire allocation at a single site. This has resulted in a less sustainable site being allocated. As such my client believes that the SNP conflicts with Basic Conditions A and D.</p>
Hopkins Homes represented by Pegasus Group	Object	Fiddlers Field Policy FF2	<p>Policy FF2 is not consistent with Policy SS5 of the emerging Colchester Local Plan as it includes the wording 'up to' 150 new homes. The removal of 'up to' from a previous draft of Policy SS5 and the reference to at least 14,720 new homes in Policy SG2 demonstrate that the figure of 150 dwellings should not be seen as a maximum limit for Eight Ash Green, which accords with paragraph 59 of the NPPF that aims to significantly boost the supply of homes.</p> <p>This reinforces the argument the allocation of a single site for Eight Ash Green to the far west of the village does not give sufficient flexibility to accommodate future growth in more sustainable locations that promote greater opportunities for residents to use sustainable modes of travel. It also demonstrates that the SNP is in conflict with Basic Condition E as it would not be in general conformity with the strategic policies contained within the emerging Colchester Borough Local Plan.</p> <p>Proposed Policy Change: Policy FF2 should be amended so the words 'up to' are replaced by 'at least'</p>
Hopkins Homes represented by	Object	Fiddlers Field Policy FF4	From the Site Selection Process document it appears that the promoter of site 226 offered road access via a new link road between Fiddlers Hill and A1124 with a roundabout at each end to help divert heavy traffic from going past the

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Respondent	Obj/Sup/Com	NP Section	Representation
Pegasus Group			<p>school entrance as well as off Wood Lane and that no houses would 'front' on to the new link road. This developer promise has clearly been incorporated into the specific wording of Policy FF4. The accompanying text to Policy FF4 identifies that the proposed link road and associated junctions were key reasons why villages chose to allocate the Fiddlers Field site.</p> <p>However, the specific requirement to deliver a new direct access road to accommodate HGV traffic with access by way of a priority junction cannot be guaranteed and will be subject to the agreement of the Local Highway Authority. Moreover, having a road that has no dwellings fronting onto it running through the centre of the new development is not conducive to supporting pedestrian and cycle movements to destinations like the primary school, or other community facilities in the village, which are some distance from the proposed allocation.</p> <p>From a design point of view the proposed road would clearly be designed to accommodate vehicular traffic rather than being a street at the heart of a people focused development. This would fail to comply with CBC Policies UR2, TA1 and TA2 and paragraphs 78, 102, 110 of the NPPF that seek to enhance the places where people live and promoting walking and cycling. Clearly the emphasis of the site selection process was to improve the situation for existing residents with little regard for the living condition of future residents.</p> <p>There are clearly aspirations for community facilities to be delivered as part of the proposed allocation both on-site and off-site. Given the significant financial requirements of providing the highway infrastructure identified in Policy FF4 there is the potential for viability to be a material consideration in the determination of any planning application. This could negatively impact upon the provision of off-site community facilities and wider road network improvements identified in Policy FF14. This could also result in a negative</p>

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Respondent	Obj/Sup/Com	NP Section	Representation
			<p>impact upon the level of affordable housing that the development would be capable of delivering in conflict with CSP Policy H4 and NPPF paragraphs 20 and 34.</p> <p>The selection process has given a disproportionate amount of weight to the delivery of this piece of infrastructure for site 226 to be accepted by the village, which cannot be guaranteed. This has resulted in a less sustainable site being allocated. As such my client believes that the SNP conflicts with Basic Conditions A and D.</p>
Hopkins Homes represented by Pegasus Group	Comment	Fiddlers Field Policy FF8	<p>Criteria 10 of the Call for Sites Assessment Checklist looked at how far is the site from existing public transport. Based on this criteria site 039 performs better than site 226, which is at the far western end of the village, the furthest away from Colchester, the Stanway retail area and the nearest secondary school. At present, the nearest bus stop on the A1124 to the proposed allocation is some 200m away and Policy FF8 seeks to deliver new bus stops on the A1124. In contrast to this, there is an existing bus stop to the south of site 039 on the A1124 that presently connects the village with Colchester.</p> <p>There is no guarantee that the Fiddlers Field development will deliver new bus stop on the A1124 or that the provision of a new bus stop would not have an adverse impact on the existing service for the village. Moreover, depending on the timing of any new bus stops and the phasing of the new homes it could be that new residents move in before the bus stops are provided. Once residents move in and establish travel habits using the private car it will be difficult to encourage use of public transport. The need for a bus stop to make the allocation acceptable reinforces the lack of robustness of the site selection process that identified it. Therefore, it is inevitable that a greater number of residents of the preferred Fiddlers Field site would use private cars to access most of the village facilities and the employment and retail areas of Colchester. This would result in additional traffic on the already heavily used A1124.</p>

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Respondent	Obj/Sup/Com	NP Section	Representation
			<p>Whilst the bus stops are required to increase the sustainability of the site by allowing greater access to public transport there is no guarantee that they can be delivered.</p> <p>Therefore, greater weight should have been given to sites that are presently well served by public transport through the site selection process. This has resulted in a site being allocated that will not deliver a sustainable form of development. As such my client believes that the SNP conflicts with Basic Conditions A and D.</p>
Natural England	Support	Fiddlers Field Policy FF9	<p>Natural England welcomes the inclusion of a policy requiring 'landscaping' for the allocated development, however this policy should extend to landscaping and the inclusion of green infrastructure (GI) for the benefit of the natural environment. High quality GI should be sought with the aim of achieving an enhancement to the natural environment and net gain, consistent with policies, of the NPPF. This policy wording therefore needs to be broadened and strengthened. The creation of suitable green infrastructure within new development is important to create robust environmental linkages to the wider natural environment and on-site mitigation; for instance appropriate GI forms part of the requirements for the Essex RAMS strategic solution to ensure mitigation for recreational impacts (in-combination) is met.</p>
Anglian Water Services	Object	Fiddlers Field Policy FF10	<p>Reference is made to the preparation of a scheme to demonstrate appropriate surface water drainage is provided within the allocation site.</p> <p>The Revised National Planning Policy Framework (February 2019) states that major development sites will be expected to incorporate Sustainable Drainage Systems (SuDs) unless can shown to be technically unfeasible.</p> <p>Anglian Water support the requirement for applicants to include the provision of Sustainable Drainage Systems (SuDS) so as not to increase flood risk and</p>

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Respondent	Obj/Sup/Com	NP Section	Representation
			<p>to reduce flood risk where possible. The use of SuDS would help to reduce the risk of surface water and sewer flooding.</p> <p>We therefore ask that Policy FF10 be amended to refer to the provision of Sustainable Drainage Systems as follows:</p> <p><b>'f) Adopting best practice in sustainable urban drainage with development proposals incorporating the provision of Sustainable Drainage Systems (SuDS) unless it can be demonstrated to be technically unfeasible.'</b></p>
Essex County Council	Comment	Fiddlers Field Policy FF10	<p>Essex County Council as Lead Local Flood Authority request the following additional wording to FF10</p> <p>'... in line with the Essex SuDS guide. Where possible SuDS should incorporate above ground features to maximise the provision multifunctional green infrastructure.'</p>
Colchester Borough Council	Support	Fiddlers Field Policy FF14	<p>To provide clarity of the proposed extent of the allocation, a policies map should be included.</p> <p>Clause FF14 should be updated to provide greater flexibility of how developer contributions could be secured. This clause should be updated to "A Section 106 Agreement and/or, through a Community Infrastructure Levy (CIL) payment or other planning obligation".</p> <p>As noted in the Eight Ash Green Strategic Environmental Assessment (SEA) Report (January 2019), an additional clause should be added to the Fiddlers Field Policy in relation to the adjacent Local Wildlife Site (LWS). This clause could read as:</p> <p>FF15 - Without adversely affecting the Local Wildlife Site, provision of sufficient open space to meet the daily needs of future residents.</p>

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<b>Respondent</b>	<b>Obj/Sup/Com</b>	<b>NP Section</b>	<b>Representation</b>
Essex County Council	Comment	Fiddlers Field Policy FF14	Essex County Council (ECC) make the following comment on Policy FF14. This may be read as a comprehensive list of infrastructure requirements. ECC as Local Education Authority may, for example, also require a secondary school contribution. It should be made clear that these are the priorities of the Parish Council and that other parties may seek other contributions, through the planning process (via the Local Planning Authority).
Mrs Bewg Emily	Object	Fiddlers Field Policy FF1-FF14	<p>The introduction of a mini-roundabout + a bus stop at the entrance to the development on the A1124 side will increase the amount of standing traffic outside of the existing houses (particularly Choats cottages to the south of the development). This will be a detrimental impact to existing residents. While those residents currently experience high speed traffic - at least it is not sitting idle outside of homes.</p> <p>The plans are still unclear as to how traffic will access the existing businesses at Fiddlers farm. will there be a route through the new housing development or will there be access directly from fordham road?</p>
Mrs Bewg Emily	Object	Fiddlers Field Policy FF1-FF14	<p>We contest that residents were aware of the tiered voting process to determine the final site location. The notices/newsletters/website did not make it clear at the point when 9 sites were selected that there would be a ranking process and voting. The consultation sessions were advertised as awareness sessions not voting.</p> <p>We also contest that describing site 226 as a single site is mis-leading with the plan to establish an HGV traffic link road right through the middle of the development. There seem to be two developments here - one on one side of the road and one on the other. This will squish the housing into small pockets and will be less appealing for residents and will not join the village together.</p>
Mr Prestwich Colin	Object	Fiddlers Field Policy FF1-FF14	<p>I write on the subject of the Eight Ash Green Neighbourhood Plan and the proposed adoption of Site 226 for development.</p> <p>My major concern is the increase in traffic that any such development would</p>

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Respondent	Obj/Sup/ Com	NP Section	Representation
			<p>cause and if the proposal is to go ahead mitigating factors must be implemented.</p> <p>Firstly, I would like to complain about this process which, in and of itself, has all along precluded options which would have minimised the impact of additional traffic; clearly, a village the size of Eight Ash Green, and its associated road infrastructure, would more easily accommodate additional houses if they were spread over several sites. However, it has always been presented as a choice of a site in an "all or nothing" manner.</p> <p>There are already significant problems of traffic in the evenings caused by cars wanting to turn right onto Spring Lane and Wood Lane. The Spring Lane junction is a particular problem and traffic can back up as far as the A12 roundabout. Clearly, this will be exacerbated by any more traffic trying to reach any part of the village. Mini-roundabouts are required at the Spring Lane and Wood Lane junctions to reduce the back up of traffic. The cost of this should fall to the Council as it is an existing problem.</p> <p>I am also firmly of the view that if Site 226 is to be developed then a footpath is needed all the way from Fiddlers Folly down to Fiddlers Farm so that pedestrians have a chance of getting to Fordham via footpaths with less of a risk of being run over. The cost of this should fall to the developer.</p>
Colchester Borough Council	Support	Policy DH1	It is common practice for policy to be written in present tense. Within Policy DH1 "be able to" and "it should" should be deleted.
Natural England	Support	Policy DH1	Natural England would advise that this policy should make reference to a requirement for high quality green infrastructure.
Colchester Borough Council	Support	Policy EP2	The term "village" should be updated to "Neighbourhood Plan Area" to provide greater clarity and consistency.



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Respondent	Obj/Sup/Com	NP Section	Representation
Hopkins Homes represented by Pegasus Group	Object	Policy EP2	<p>Policy EP2 identifies the importance of green spaces within the village. The Neighbourhood Plan offers an opportunity to bring the different parts of the village together whilst still according with the vision of continuing to enjoy wide open spaces within the village with uninterrupted views of the countryside.</p> <p>Through the site assessment process it was acknowledged that my client's site would not result in coalescence as it is screened from views from the north by the existing, mature landscaping. However, the Neighbourhood Plan Group site assessments table in Annex P of the Site Selection Process document shows that site 039 failed to meet one of the four Primary Criteria due to loss of open views.</p> <p>The amenity land to the west that my client has proposed would secure an important part of the green separation in perpetuity and avoid ribbon development along the A1124. Site 039 is also capable of meeting the other objectives of the Neighbourhood Plan and would perform better than site 226 with regards to reducing the environmental impact of travel and supporting local businesses and facilities. Therefore, an alternative development site to meet future housing need, or if the numbers cannot be successfully accommodated on site 226, should also be proposed at site 039.</p> <p>The selection process has given a disproportionate amount of weight to the protection of the green space at the centre of the village. This has resulted in a less sustainable site being allocated. As such my client believes that the SNP conflicts with Basic Conditions A and D.</p> <p>Proposed Change: The wording of Policy EP2 needs to allow greater flexibility for the future development of some of the villages green spaces where there would be clear public benefits to accommodating new homes in the most sustainable locations.</p>

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<b>Respondent</b>	<b>Obj/Sup/Com</b>	<b>NP Section</b>	<b>Representation</b>
Natural England	Support	Policy EP2	Natural England welcomes that there is a policy restriction on existing green spaces to prohibit their development or change of use. This policy requirement is supported.
Colchester Borough Council	Support	Policy EP3	<p>The term "village" should be updated to "Neighbourhood Plan Area" to provide greater clarity and consistency.</p> <p>To be consistent with the NPPF, the policy wording should be updated:</p> <p>"Any development in the Neighbourhood Plan Area that may result in the destruction and/or removal of existing hedgerows, trees or woods, will only be permitted if these elements are replaced with equivalent features, on the same site or plot."</p>
Natural England	Support	Policy EP3	The protection of hedgerows, trees and woodland is supported and Natural England welcomes this policy, however this should extend to all aspects of the natural environment. Natural England would expect an overarching natural environment policy to ensure that in addition to relevant habitats and species, development looks to avoid significant effects to designated sites, both national and international. It is therefore advised that this also extends to the requirement for an environmental assessment, or habitats regulations assessment (HRA), with any required mitigation or compensation sought through the appropriate methods.
Environment Agency	Comment	Policy EP5	<p>Thank you for your letter relating to the Eight Ash Green Neighbourhood Plan. We have assessed the draft Neighbourhood Plan as submitted and our letter contains our response and information in relation to environmental issues that should be considered during the development of the Neighbourhood Plan.</p> <p>Our principal aims are to protect and improve the environment, and to promote sustainable development, we:</p> <ul style="list-style-type: none"> <li>• Act to reduce climate change and its consequences</li> <li>• Protect and improve water, land and air</li> <li>• Work with people and communities to create better places</li> </ul>

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Respondent	Obj/Sup/Com	NP Section	Representation
			<ul style="list-style-type: none"> <li>• Work with businesses and other organisations to use resources wisely</li> </ul> <p>You may find the following two documents useful. They explain our role in in the planning process in more detail and describe how we work with others; they provide:</p> <ul style="list-style-type: none"> <li>• An overview of our role in development and when you should contact us.</li> <li>• Initial advice on how to manage the environmental impact and opportunities of development.</li> <li>• Signposting to further information which will help you with development.</li> <li>• Links to the consents and permits you or developers may need from us.</li> </ul> <p>Our role in development and how we can help:  <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c8ed3d.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c8ed3d.pdf</a></p> <p>Environment Policy 5 refers to surface water flooding and does not involve fluvial flooding. The supporting text rationalises that the fluvial flood risk is a narrow strip along the boundary. However, we wish to highlight that the statutory main river 'Tributary of the Colne' is currently unmodelled and may be modelled in the future by ourselves. If any planning applications are received within 16 meters of the main river we may request that the applicant models the river themselves in order to determine the flood risk.</p> <p>Please note that the view expressed in this letter by the Environment Agency is a response to the proposed Neighbourhood Development Plan only and does not represent our final view in relation to any future planning or permit applications that may come forward. We reserve the right to change our position in relation to any such application. Please contact me on the details below should you have any questions or</p>

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Respondent	Obj/Sup/Com	NP Section	Representation
			<p>would wish to contact any of our specialist advisors. Please continue to keep us advised on the progress of the plan.</p>
Essex County Council	Object	Policy EP5	<p>Policy EP5 addresses works affecting Ordinary Watercourses. Permission to carry out works should not be considered a planning matter and must be dealt with under section 23 of the Land Drainage Act. Works to any ordinary watercourse must be approved by the Lead Local Flood Authority before work can take place. A range of issues will be taken into consideration when assessing an application for ordinary watercourse consent including flood risk but also covering topics such as biodiversity and amenity. It is expected that where ordinary watercourses are within the boundary of a proposed development, they should form part of the wider green infrastructure of that development. Maintenance of the existing ditch network is the responsibility of riparian owners of those ditches, failure to carry out necessary maintenance may lead to enforcement action.</p> <p>Consideration of flood risk associated with development within the plan area should not just include risk associated with the plan area but should take into account wider flood risk. These techniques should encompass the four pillars of SuDS, that is addressing water quantity, water quality, biodiversity and amenity. In order to achieve these results the use of above ground SuDS should be promoted. Where possible, these features should be multifunctional, not only providing flood risk mitigation but also enhancing green infrastructure within the plan area.</p> <p>All drainage strategies for major development within the plan area should be based on the Essex SuDS Guide. It is recommended that developers engage in pre-applications discussions with the Lead Local Flood Authority to ensure that any recommendations can be incorporated into site design as early into the planning process as possible. While the lead Local Flood Authority is not currently a statutory consultee on minor application it is still recommended that the principles of the Essex SuDS design guide are implemented on</p>

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			<p>smaller sites to ensure that the cumulative effect of multiple smaller developments does not have a significant increase downstream flood risk.</p>
Colchester Borough Council	Support	Policy EP5	<p>The term "village" should be updated to "Neighbourhood Plan Area" to provide greater clarity and consistency.</p> <p>Work which may affect an ordinary watercourse (which can include drainage ditches) or main river, may require consent under the Land Drainage Act 1991 from Essex County Council as the Lead Local Flood Authority (LLFA) for ordinary watercourses or the Environment Agency for main rivers. As such it is not appropriate for the policy to support the stopping up or diverting of drainage ditches to enable development if no additional flood risk is created. The policy should be updated as below:</p> <p>Development will be supported where it is shown that it will not negatively impact upon the existing network of drainage ditches within the Neighbourhood Plan Area. The protection and enhancement of these facilities is encouraged. Where it is necessary to enable development, any changes to a watercourse may require consent from Essex County Council as the Lead Local Flood Authority (LLFA) for an ordinary watercourse, or the Environment Agency for main rivers. Developers should contact the LLFA or Environment Agency for further advice.</p>
Colchester Borough Council	Support	Policy HER1	<p>As noted in the Eight Ash Green Strategic Environmental Assessment (SEA) Report (January 2019), to be consistent with the NPPF, "historic asset" should be replaced with "heritage asset".</p>
Colchester Borough Council	Support	Policy BP1	<p>As noted in the Eight Ash Green Strategic Environmental Assessment (SEA) Report (January 2019), wording should be included in policy BP1 to ensure sufficient mitigation for extension of employment sites. Policy BP1 should be updated to include the following clause:</p> <p>Moat Farm (shown above) is designated as a new business area. Proposals for the enhancement of existing facilities or for new business premises on the</p>

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<b>Respondent</b>	<b>Obj/Sup/Com</b>	<b>NP Section</b>	<b>Representation</b>
			<p>site will be supported provided they are of suitable design, provide satisfactory car parking for staff and visitors, have implemented a strategy for the contaminant and subsequent disposal of waste, and sufficiently mitigate any negative effects resulting from the expansion of existing employment areas.</p> <p>A boundary should be added to the policy map to clearly outline the extent of the Moat Farm business area.</p>
Colchester Borough Council	Support	Policy BP2	A boundary should be added to the policy map to clearly outline the extent of the Fiddlers Farm business area.
Colchester Borough Council	Support	Policy CA1	<p>To ensure consistency with the NPPF, the policy should be updated to ensure sufficient provision of the community facility. The policy should be updated to the following:</p> <p>"To protect and enhance the allotments site (as shown below) from any future potential development."</p> <p>A boundary should be added to the policy map to clearly outline the extent of the allotments area.</p>
Colchester Borough Council	Support	Policy CS1	A boundary should be added to the policy map to clearly outline the area designated for a new Community Hub/Hall
Hopkins Homes represented by Pegasus Group	Support	Policy CS1	<p>The objective to introduce new amenity facilities within the central part of the village needs to be supported by new residential development that will result in new residents being within easy walking and cycling distance of them. Site 039 clearly meets this objective better than site 226 for the reasons mentioned previously.</p> <p>As the proposed community facility will be partly funded by developer contributions it is critical that other financial burdens placed on development to make them acceptable are reduced. This reinforces the concern that</p>

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Respondent	Obj/Sup/ Com	NP Section	Representation
			development on the Fiddlers Field site is so heavily dependant on delivering the new road and priority junctions that the development will offer little in the way of wider community benefits.  Proposed Change: None
Natural England	Support	Policy RAMS1	Natural England supports the inclusion of an Essex RAMS policy which is consistent with the approach being taken within the Colchester Local Plan and its accompanying HRA.
Colchester Borough Council	Comment	Projects	Project boxes should be highlighted in a different colour from the policies and objectives of the Neighbourhood Plan to clearly demonstrate their differences.
Colchester Borough Council	Support	Annex B	Although it is noted this annex is intended as an indication of the type, style and number of properties to be built at the site allocation of Fiddlers Field, the affordable housing provision should be updated to 30% to reflect the figure being pursued in the Emerging Colchester Local Plan.
Gladman Developments Ltd	Support	Habitats Regulation Assessment and Appropriate Assessment	To support the EAGNP a HRA screening assessment was undertaken. In light of the People Over Wind (People Over Wind and Sweetman v Coillte Teoranta (Case C-323/17) judgement it was determined that a full Appropriate Assessment (AA) would need to be undertaken to support of the plan to demonstrate how the effects of the EAGNP either alone or in combination with other projects or development plans produced in the area would not have a significant effect on Habitat Sites. The AA was published for comment during the consultation period. As such, to ensure a robust consultation exercise and so that all parties who may wish to have done so have had a fair and equal opportunity to comment on this document, Gladman suggest that further consultation on this document should be considered prior to submission of the neighbourhood plan to the Independent Examiner. Notwithstanding this, Gladman have reviewed the AA and are broadly supportive of its conclusions.
Natural England	Support	Habitats Regulation	Having reviewed the Habitats Regulations Assessment, Natural England agrees with the conclusion that the Eight Ash Green Neighbourhood plan is

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Respondent	Obj/Sup/Com	NP Section	Representation
		Assessment – Appropriate Assessment	<p>unlikely to have likely significant effects on internationally designated sites when considered alone.</p> <p>It has been identified that there are likely to be significant effects through recreational disturbance (to both species and habitats). Further assessment on this matter has been considered in-combination with other plans and projects which is consistent with Natural England’s advice on the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy. The assessment has identified that mitigation to these impacts will be provided in accordance with the emerging strategic solution, in particular through the requirement for residential developments to provide an appropriate financial contribution, which Natural England supports. Reference should also be made to the importance of on-site mitigation measures in addition to the off-site financial contribution as per our letter reference 244199 in providing adequate mitigation for these coastal designated sites. Natural England would otherwise agree that subject to the identified mitigation and emerging strategic solution, that this will be sufficient to avoid adverse effects on the integrity of the Essex coast designated sites.</p>
Natural England	Support	Strategic Environmental Assessment	<p>Natural England acknowledges that recent changes to the legislation now allow for Neighbourhood Plans to proceed to Appropriate Assessment when conducting a HRA, in the case of the Eight Ash Green Neighbourhood Plan an SEA is now required following the need for an AA in light of the identified recreational disturbance issues to the Essex Coast designated sites. We welcome the further opportunity to comment on this report and note that within the SEA Framework Objective 4 refers to the protection and enhancement of the green/open spaces and biodiversity.</p> <p>It is welcomed that the SEA includes objectives aimed towards conserving and enhancing biodiversity. The scope of this objective should also look to protect and enhance other aspects of the natural environment, in accordance with the NPPF such as geodiversity and local landscape.</p>



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			<p>Natural England supports the intention of these objectives, but would also recommend a wider scope of indicators in relation to the natural environment. We would also recommend that the Indicator for biodiversity which is currently "<i>Area of land offset for biodiversity</i>" should be amended to "<i>Area of land identified for biodiversity enhancement and/or protection</i>" as offsetting has a very specific meaning.</p>