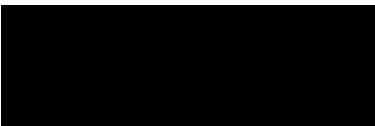


Colchester Borough Local Plan 2017-2033 Examination – Section 2**Further Written Statement by Keith Quinton BSc CEng MICE (Retired Highways Engineer).**

2 April 2021

1. I submitted Representations to Section 2 of the Colchester Publication Draft Local Plan on 10 August 2017.
2. I am making this written statement now with reference to Main Matter 9 – Sustainable Settlements, and in particular the Question relating to whether the site allocation is justified having regard to national guidance and local context. In particular, the requirements of the Essex Design Guide for Street Types.
3. My Representations related to the Section headed “Policy SS4: Copford and Copford Green” and were given ID’s, namely 6646, 6658 and 6662, and were all Objections. All related to the land East of Queensberry Avenue.
4. With respect to Representation ID 6646, I wish to update this to reflect the publication of a new edition of the Essex Design Guide since 2017.
5. The latest edition of the Essex Design Guide uses different terminology for the various Street Types to the previous version. Referring to the Street Type Table in the new Guide, it outlines the key design features of streets and the numbers of dwellings they should serve.
6. Referring to Street Type E, it is described as an “Access”. The carriageway width and footways are specified as 5.5m and 2 x 2m footways. This is exactly what Queensberry Avenue is. The previous Design Guide quoted in my ID 6646 gave the type as Road Type 3: Feeder. Clearly this is no longer relevant. However, it does not change the basic principle nor the substance of my objection.
7. Queensberry Avenue is a cul-de-sac, serving 156 dwellings (units). The Council’s proposal is to add 70 new dwellings with access via Queensberry Avenue and /or London Road. Unfortunately, the “access” wording is ambiguous. The Borough Council could take it to mean access via Queensberry Avenue or London Road in my opinion, and therefore Queensberry Avenue only. If that were to be done it would remain as a cul-de-sac for the new development.

8. That would mean a total of 226 dwellings served by a Type E Access, which would be a cul-de-sac. Reference to the Design Guide Street Type Table, Type E Access, the number of units to be served is stated as 200. Hence there are 26 units too many, and the development would be limited to 44 only.
9. With respect to the LPA initial response for Copford taken from the documents on the Examination web site link, the only relevant statement is that “adequate infrastructure improvements and safeguards will be supported”. Frankly, this is very general and not good enough in my opinion. They have never provided a reasoned argument for departing from the Essex Design Guide. Yes, it is titled a “Guide” but in the absence of reasoned arguments and evidence as to why it should be ignored or varied, it is the local guidance that must be adhered to. Essex County Council is the Highway Authority and has produced the Design Guide. It is not for the Borough Council to unilaterally interpret / vary the requirements of that Guide.
10. Hence, I respectfully ask that the Local Plan be amended to state that 70 dwellings (units) can only be provided by accessing the site from Queensberry Avenue **and** London Road, or **just** London Road given a suitable Street Type that complies with the Essex Design Guide, to be built with the development. The Design Guide provides that A Type E Access can serve 400 units if it is “on a loop”, ie two separate points of access from the main road (London Road in this instance). Alternatively the Plan should be amended to state that only 44 units can be provided by using Queensberry Avenue as the only access.
11. My two other objections, ID’s 6658 and 6662 stand as submitted previously.
12. Thank you for taking the time to consider my objections.

Keith Quinton
2 April 2021

