



29<sup>th</sup> April 2021

## **Colchester Local Plan Section 2**

### **Colchester Local Plan Section 2 – Main Matter 9**

#### **Supplementary Statement in response to Bloor Homes' Supplementary Statement [prepared by Strutt and Parker]**

The following comments are made in direct response to the Supplementary Statement prepared by Strutt and Parker and submitted on behalf of Bloor Homes on 26<sup>th</sup> April 2021. Their comments are primarily focused on changes to the Tiptree Policies Map.

#### **Policy Context**

It is our understanding that the purpose of Policy SS14 is to provide a policy framework to guide the Tiptree Neighbourhood Plan. This is important, as a draft neighbourhood plan must be in general conformity with the strategic policies of the development plan, and when they are brought into force, will become part of the development plan for the neighbourhood area. Policy SS14 therefore has the important function of guiding the direction of the Tiptree Neighbourhood Plan.

In this case, whilst the Tiptree Neighbourhood Plan had reached a point of examination in 2020, due to the conclusions of the examining Inspector, the Neighbourhood Plan has had to take a step back in process to enable Tiptree Parish Council to update part of the plan to make it sound. It will now come forward after the adoption of the Colchester Local plan Section 2.

#### **Policies Map Modifications**

The role of the Policies Map is to illustrate geographically, the application of policies in the plan. Regulation 5(1)(b) of the 2012 Regulations refers to a map accompanying a Regulation 5(1)(a) document showing how the adopted policies map would be amended if it were adopted. This map (referred to as the "submission policies map" in Regulation 2(1)) is not defined as a DPD or local plan under Regulation 2(1).

The Policies Map is therefore not a development plan document and it is not before the Inspector for examination. This means that the Inspector has no powers to recommend main modifications directly to it.

The changes made by Colchester Borough Council to the Policies Map for Policy SS14 remove the broad location for growth to the west of Tiptree and introduce a broad location to the north of Tiptree. The broad location to the north-west of Tiptree remains unchanged.

The Key to the Policies Maps clearly describes the arrows as 'Neighbourhood Plan Preferred Direction of Growth'. This is not a definitive allocation, but a broad direction of growth. The Council explains in their Topic Paper that the arrows were included as a tool to guide development in the event that a neighbourhood plan did not define site allocations. These are therefore just indicative symbols on the Policies Map and are not site allocations.

The Council clearly expressed the reasons for the change to the broad locations, i.e.

- The preferred strategy for growth to the north and north-west of the settlement was derived from community consultation through the Neighbourhood Plan process.
- A review of the Local Wildlife Sites modifies the site boundaries, which affects the Inworth Grange and Brook Meadow LWS, which were substantially extended.
- The need to avoid coalescence between Tiptree and Tiptree Heath, as highlighted in a recent appeal decision, which stated that 'the effective closing of the gap between Tiptree and Tiptree Heath would be highly damaging to both, and to the rural character in particular.

We note that the Bloor Homes representation tries to discredit the approach taken by the Council. However, the approach taken by Colchester Borough Council appears to be based on a robust response to the evidence accumulated since the submission of the Local plan. In particular:

- Whilst, the submitted Tiptree Neighbourhood Plan was found to not have met legal requirements, it was supported by a comprehensive consultation exercise that was commended by the examining Inspector. This represents valuable evidence that can be transferred to the consideration of Policy SS14.

Issues relating to the unsound elements of the Neighbourhood Plan are a matter for Tiptree Parish Council to address through the Neighbourhood Plan process. However, this does not prevent Colchester Borough Council utilising the evidence gathered through public consultation to inform the broad policy framework for Policy SS14. The amended arrows are based on the evidence gathered during public consultation.

- The Tiptree Neighbourhood Plan was based on an extensive evidence base, however this evidence does not appear to have been fully reviewed by the examining Inspector. Please refer to the '*Tiptree Neighbourhood Plan – Joint Examination Response – December 2020*', where the Neighbourhood Plan Examination was explained and clarified by the Council. If this evidence had been considered, a different outcome may well have occurred.
- The broad location to the west of Tiptree was identified in the evidence as having coalescence and ecology / wildlife constraints and as a result is not capable of delivering the necessary residential units. By contrast, no technical constraints were identified that would prevent development to the north of Tiptree. The broad location arrows within the submitted version of the local plan are therefore no longer effective and now need to be adjusted.

## Highways Evidence

The Bloor Homes representation questions the highways evidence submitted with Topic Paper 6, titled 'Review of Transport Issues raised by the Tiptree Neighbourhood Plan'. This document provides a high-level transport assessment.

This document indicates that a link road to the north of Tiptree would divert some of this additional traffic away from the existing road network. But it also points out further consultation is required with Essex

County Council and Highways England. This recommendation has been reflected in the proposed amendment to Policy SS14, which now makes the requirement for a detailed transport assessment as part of the Neighbourhood Plan to assess the first phases of a road between the B1022 and B1023.

### **Summary**

The proposed modifications are based on sound and proportionate evidence that has updated the policy position since the time of submission.

The Policies Map is not a development plan document and it is not before the Inspector for examination. But in any event, the changes made to it are proportionate based on public consultation, updated evidence and recent planning decisions.