

# **Colchester Submission Version**

## **Draft Local Plan**

### **Appendices**

## **Colchester City Council**

#### **Final report**

Prepared by LUC

August 2026

| Version | Status       | Prepared                                                                   | Checked    | Approved   | Date       |
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Colchester Submission Version Draft Local Plan

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## Appendix A

### Consultation Comments

#### Comments received on the Scoping Report and how they have been addressed

##### Environment Agency

**A.1** We have undertaken an initial review of the SA Scoping Report. Following an initial overview of the document, we cannot see any gaps of information or other documents for review at this time. You should ensure that any evidence-based documents are the most up to date available. For any data you require that we hold please contact our customer and engagement team at [enquiries\\_eastanglia@environment-agency.gov.uk](mailto:enquiries_eastanglia@environment-agency.gov.uk) and they shall process any data request for you.

**A.2** We are able to carry out a more in-depth review under our charged for service if this is required by yourselves. If you wish for us to review this under our charged for service, please contact me further to discuss this in more detail.

#### Response

Comment noted. The evidence is being progressed as the plan progresses. The summary of relevant policies, plans and programmes will be kept updated as part of further stages of the iterative SA process.

## Historic England

**A.3** Thank you for consulting Historic England about the Colchester Local Plan Review SA Scoping report consultation.

**A.4** In terms of the historic environment, we consider that the report has identified the plans and programmes which are of relevance to the development of the Local Plan Review, that it has established an appropriate Baseline against which to assess the Plan's proposals and that it has put forward a suitable set of Objectives and Indicators. Overall, therefore, we believe that it provides an appropriate framework for assessing the likely significant effects which this plan might have upon the historic environment.

**A.5** Historic England strongly advises that the conservation and archaeological team of your authority are closely involved throughout the preparation of the SA of this Plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. Historic England has produced guidance for all involved in undertaking SEA/SA exercises which gives advice on issues relating to the historic environment.

**A.6** This opinion is based on the information provided by you in the document dated April 2024 and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SA/SEA, have adverse effects on the environment.

**A.7** If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

## Response

The Council welcomes the comment that the scoping report provides an appropriate framework for assessing the likely significant effects which this plan might have upon the historic environment. The Council will involve the Historic Environment Officer in the preparation of both the plan and SA.

## Natural England

**A.8** Thank you for your consultation on the above dated 16 April 2024.

**A.9** Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**A.10** Natural England is pleased to see reference in the Scoping Report to making enhancement of the green network and waterways in Colchester the priority for the Plan. We are also pleased to see that officers would like to allocate strategic biodiversity net gain sites and biodiversity net gain corridors/stepping stones to deliver the greatest benefits for biodiversity and enhance connections between existing and new wildlife sites. We wish to see areas highlighted as having significant importance for biodiversity recognised with nature recovery measures enacted there for the benefit of people and nature; for example Middlewick Ranges Local Wildlife Site.

**A.11** We have been asked to provide comments on the following considerations:

- Are there any other plans and programmes that we should review?

**A.12** Within the sections on Biodiversity and Landscape, Natural England welcomes the inclusion of the Environmental Improvement Plan (2023) and the 25 Year Environment Plan, England Biodiversity Strategy Climate Change Adaptation Principles, Essex Local Nature Recovery Strategy (LNRS) etc. We have not critically reviewed the plans listed, however, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area:

- Green infrastructure strategies
- Biodiversity plans
- Rights of Way Improvement Plans
- Shoreline management plans
- Coastal access plans
- River basin management plans
- AONB management plans.
- Relevant landscape plans and strategies.

**A.13** We acknowledge the importance of these plans and programmes which should ensure that the Colchester Local Plan is used to shape and build a Nature Recovery Network both in the Borough and working with the wider Essex LNRS, with an emphasis on enlarging, connecting and improving management of remaining biodiverse areas. We wish to see the LNRS and Biodiversity Net Gain used as tools over the lifetime of the Local Plan to spatially highlight and deliver the Nature Recovery Network.

- Is anything missing from the baseline information?
  - Please see the annex attached to our covering email for our advice on sources of local plan evidence on the natural environment.
- Are there any other sustainability issues facing Colchester that we have not identified?
  - No comment.

## Appendix A Consultation Comments

- Do you agree with the comments on the likely evolution without the local plan?
  - No comment.
- Will the sustainability objectives and assessment criteria ensure that the sustainability of Colchester's plan options are robustly tested and is the wording of the objectives optimal for appraisal purposes?
  - We note that there is no reference to the restoration of biodiversity, with the issues referring only to protection and enhancement. We recommend that the restoration of biodiversity is included in line with the National Planning Policy Framework.
  - We note that there is a reference to increasing access to open spaces, green infrastructure and recreational facilities and suggest that this also mentions improving people's access to nature as a key issue.
- Are there any monitoring indicators that should be added?
  - As set out in Strategic environmental assessment and sustainability appraisal - GOV.UK, you should be monitoring the significant environmental effects of implementing the current Local Plan.
  - The natural environment metrics in the baseline information are largely driven by factors other than the plan's performance. They are thus likely to be of little value in monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.
  - Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.

### A.14 Biodiversity:

- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.
- Percentage of major developments generating overall biodiversity enhancement.

## Appendix A Consultation Comments

- Hectares of biodiversity habitat delivered through strategic site allocations.

### A.15 Landscape:

- Amount of new development in AONB with commentary on likely impact.

### A.16 Green infrastructure:

- Percentage of the city's population having access to a natural greenspace within 400 metres of their home.
- Length of greenways constructed.
- Hectares of accessible open space per 1000 population.

**A.17** In addition to our comments above we advise your authority to refer to Natural England's comments provided in response to consultation on the Colchester Local Plan Review - Developing a vision for Colchester, in our letter dated 19 March 2024 (ref. 466454). Our comments in relation to climate change, BNG, green infrastructure and Middlewick Ranges are particularly relevant.

**A.18** We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

## Response

The Council welcomes the support for the approach to the Local Plan Review.

The types of plans and evidence related to the natural environment listed have and will continue to be considered as the plan and SA progress.

The Council is a Supporting Authority in the Essex LNRS and will continue to work with partners on the LNRS and incorporate relevant parts of the

LNRS into the plan, inline with the agreed approach to planning for a better environment.

Amendments have been made to the SA Framework, both the assessment criteria and monitoring indicators, to address the comments.

## Comments received on the SA of the Regulation 18 Local Plan and how they have been addressed

### Mr David Williams

**A.19** This SA, added to the portal post commencement of the S18 process, relates to the Site IDs as per the call for sites, and not, in the case of the proposed North East Colchester Housing Development to the site as a whole, as it is now described. The information regarding the positive and negative impacts, for the proposed North East Colchester development, PP9, is therefore not aligned to what the public are being consulted on. It is the whole site that should be considered, not its component parcels of land.

### Response

Paragraphs 5.198 to 5.206 of the SA report explains the process undertaken in relation to the appraisal of the Place policies.

The Place policies did not provide for development and instead have safeguarded land. Therefore, a detailed policy appraisal of a specific site within the policy was not able to be undertaken. Instead the individual site

options that were previously appraised were considered in relation to the mitigation set out within the Place policies.

### Mrs Faith Hobbs

**A.20** I am submitting this objection because the SA/SEA supporting the draft Local Plan does not properly or accurately assess the impacts of allocating up to 900 homes at Langham, nor does it comply with national planning guidance in the NPPF (Dec 2023).

- **Sewerage and Wastewater (Major Flaw)**
  - The SA fails to acknowledge clear evidence from Anglian Water and the Parish Council that Langham Water Recycling Centre has no spare capacity and has even breached environmental limits. This makes the scale of development undeliverable and conflicts with national policy requiring plans to be supported by realistic, deliverable infrastructure.[JP1.1][SB1.2]
- **Rural Character and Landscape Harm**
  - The SA dramatically underplays the level of harm caused by large-scale development in what is a small, rural village close to the Dedham Vale AONB setting. The suggestion that landscape harm can be “mitigated” is inaccurate and unsupported.
- **Transport, Car Dependency and Local Services**
  - The SA assumes that sustainable transport improvements will occur, but provides no evidence or commitments. Langham lacks: high-frequency bus service; safe cycling routes to Colchester; adequate footpaths; and, spare school/health capacity. The SA therefore overstates sustainability and underestimates negative impacts.
- **Methodological Issues — Alternatives Not Properly Assessed**
  - The appraisal does not objectively test reasonable alternatives, including:
    - modest growth in Langham (as per previous plans),

- a brownfield/urban-focused strategy,
- or distributing housing more proportionately across villages.
- Planning Inspectors have repeatedly criticised SA reports that fail to provide a genuine comparative assessment.
- Conclusion
  - Because the SA contains major omissions, optimistic assumptions, and does not properly evaluate alternatives, the allocation of 900 homes in Langham is not justified or sustainable. Removal should be considered until proper evidence and a lawful appraisal are undertaken.

### Response

The SA is only able to rely on the evidence base that is available at the time. If any new evidence base becomes available then this will be included within the SA Report.

The SA provides a high level appraisal when considering the environmental effects of every reasonable alternative site option. This appraisal work will help the council in deciding the most sustainable sites to be allocated. Other factors and evidence will be taken into consideration by the Council when selecting sites to be allocated which will include infrastructure capacity constraints and any detailed, site-specific environmental constraints. In relation to sewerage and wastewater, during Regulation 18 stage the WCS was not available at the time. It is acknowledged that the Langham WRC has capacity issues, however, evidence through the WCS will inform the SA of the submission plan.

The SA assesses the potential impacts of a policy within the Local Plan. Therefore, the SA is only considering wording that is contained within policies in the Local Plan. The SA has the ability to influence the plan but

the overall spatial strategy has been developed through the Local Plan process. However, as part of this process the SA has appraised a number of growth strategy options set out by the Council and identified the most and least sustainable option. Option 4: Intensification in the City Centre and Option 6: Hubs and Spokes were both tested through the SA. Option 4 considered the use of regenerating and intensify development in the City Centre. Option 6 focused development in the smaller settlements with Colchester. However, Option 6 was identified as the least sustainable option due to the higher number of negative effects particularly around environmental effects and the need to travel to key services.

### Mrs Faith Hobbs

**A.21** Policy PP37 is unsound because it fails to identify or assess the impacts of allocating land that is known to support roaming roe deer and associated rural wildlife. Roe deer are a protected wild species under the Wildlife and Countryside Act 1981 and the Town and Country Planning Act 1990 (as amended) and are a material consideration where development would result in habitat loss, fragmentation, severance of movement corridors, or increased mortality risk. The SA records only minor or negligible biodiversity effects but does so without any assessment of large mammal displacement, habitat permeability, lighting impacts, fencing, or increased traffic associated with a 900-dwelling allocation. These impacts cannot be adequately mitigated through generic hedgerow retention or green infrastructure at application stage. By deferring consideration of protected species impacts, the Plan fails to address a known environmental constraint at plan-making stage, contrary to NPPF paragraphs 20, 174 and 180, rendering Policy PP37 unjustified and ineffective.

## Response

The SA considers the proximity of the site to an internationally or nationally designated site, Local Wildlife Site, Local Nature reserve, Priority Habitat or Ancient Woodland.

The SA is a high level appraisal and is not able to consider specific issues associated with each individual site option. The HRA will determine if the Local Plan might negatively affect the protected features of European sites.

It is for the Local Plan to provide adequate protection for local biodiversity on a site specific basis.

## Mr Paul Armstrong

**A.22** The SA findings for Langham site PP37, summarised in table 5.46, present an unrealistically positive picture in respect of SA objective SA4 and SA5. This arises from the overly simplistic site assessment criteria used in the SA report.

**A.23** Transport Sustainability is modelled on a weighted balance of site distances from railway stations, bus stops and cycle routes. But the thresholds used in the scoring framework do not align well with achievability of the transport modal shift goals necessary to successfully deliver CCC's Local Plan vision and strategy.

**A.24** Looking at Rail first, Langham is situated approximately 9km from the nearest Railway station by road (or 6km as the crow flies), which is far above the 2km threshold for the highest available negative score in the modelling framework.

**A.25** Looking at public bus transport, the modelling framework considers only the distance to the nearest bus stop, with no consideration given to the frequency of bus service available. Langham's bus service is extremely limited in both frequency and flexibility of service destinations.

**A.26** Looking at cycle routes, the only realistic cycle route connectivity into Colchester is via Langham Lane, a derestricted and heavily potholed ratrun unsuitable for all but the most intrepid cyclist. But the scoring methodology only considers distance from a cycle route, not quality of cycle route.

**A.27** The scoring methodology therefore produces a totally unrealistic nett positive assessment of transport sustainability.

**A.28** In a similar vein, the Community and Health and Wellbeing modelling framework also produces a totally unrealistic positive assessment in which access to Langham Recreation Ground and a public right of way more than outweighs the 6km car journey to the nearest GP surgery in Ardleigh in the scoring framework.

### Response

The SA must assess a large number of site options across the plan area. Given this scale, it is not proportionate for the SA methodology to assess detailed qualitative factors such as the condition of individual walking and cycling routes or the frequency, reliability, and destination coverage of public transport services, as these characteristics vary over time and cannot be applied consistently to all sites.

For this reason, the SA uses high-level, distance based approach. While this approach cannot capture every local transport issue in detail, it ensures that all sites are appraised on an equal basis.

When appraising sites against SA5, loss of greenspace, levels of deprivation and noise pollution are also considered. The scores for each sub-criterion are totalled and averaged to provide an overall significance rating, ensuring that no single issue outweighs the rest. Proximity to key travel destinations is considered under other SA objectives and related site appraisal criteria, e.g. 3d Access to jobs, 3e/6a Town centres, 5a Open space, 5d GP surgeries, 6b/6c Schools.

### Mrs Norma Dinnie-Weall

**A.29** Policy PP9 (North-East Colchester) is not environmentally sound and has not been supported by the level of evidence required under the SEA Regulations, the NPPF, or Natural England Standing Advice. The SA is internally inconsistent and contradicts the Council's own ecological evidence.

- No On-Site Ecological Surveys Have Been Undertaken
- The Council's Emerging Biodiversity Assessment confirms that PP9 is based entirely on desk study, not fieldwork. There is no Phase 1 or Phase 2 survey, no breeding bird or winter bird survey, no botanical, mammal, invertebrate or hydrological ecology survey for St John's Fields.
- This is a serious omission for land directly beside Bullock Wood SSSI.
- No Updated Condition Data for Bullock Wood SSSI
- Natural England's publicly accessible SSSI condition data is outdated, with no recent species surveys, hydrological data, or condition assessments.
- The Council has not obtained any updated information on SSSI condition, despite allocating 2,000 homes beside it.
- This leaves a complete evidence gap, contrary to Natural England's requirement for current, site-specific information when assessing impacts on SSSIs.

## Appendix A Consultation Comments

- The SA Downplays Impacts Described as “Significant” in the Evidence Base
- The Emerging Biodiversity Assessment states a “significant impact” is likely on Bullock Wood SSSI from noise, lighting and increased recreation.
- The SA, however, assigns PP9 only an “uncertain/negligible” biodiversity impact (SA8).
- This is a clear contradiction and shows the SA has downplayed its own evidence.
- The SA Assumes Impacts Can Be “Mitigated to Neutral” Without Any Baseline Data
- Because no ecological surveys exist, the SA has no baseline from which to judge impact or mitigation. Despite this, it claims SSSI impacts could be reduced to “minor/neutral”.
- Natural England Standing Advice requires site-specific survey evidence before mitigation can be relied upon. Here, none exists.
- These SA conclusions are therefore unsupported and unsound.
- BNG Claims Are Not Supported by Spatial Evidence
- The SA repeatedly asserts that PP9 can deliver 10%+ Biodiversity Net Gain, but: no habitat mapping; no buffer mapping; no land budget; no hydrology zones; and, no spatial feasibility testing has been carried out.
- Given the proximity to a SSSI and multiple Local Wildlife Sites, BNG cannot be assumed without spatial modelling.
- The claim is unfounded.
- Hydrological Impacts Are Poorly Analysed and Scored Inconsistently
- Bullock Wood’s plateau Alder wet woodland relies on specific hydrology.
- The SA rates Water (SA14) as “significant negative” but Flood Risk (SA11) as “negligible”, an internal inconsistency that fails to reflect the woodland’s hydrological sensitivity.
- No hydrological modelling or field assessment has been undertaken.

## **Appendix A** Consultation Comments

- This is a methodological flaw.
- The Importance of the Ecological Corridor is Under-Recognised
- The Strategic Biodiversity Assessment identifies the Salary Brook – Bullock Wood – Welsh Wood corridor as a key ecological spine.
- PP9 occupies the last open farmland linking these habitats, yet the SA rates its landscape/ecological impact as only “minor/uncertain”.
- This materially understates the strategic importance of the corridor.
- No Cumulative Impact Assessment Has Been Undertaken
- PP9 affects a SSSI, two Local Wildlife Sites, a priority wet woodland habitat, a hydrological system, and a strategic ecological corridor, yet the SA provides only single averaged scores with no cumulative analysis, contrary to the SEA Regulations (2004).

### **A.30** From the evidence base, it is clear that:

- The SA contradicts the Council's own biodiversity evidence.
- BNG claims are unsupported.
- Hydrological effects are poorly analysed.
- No current condition information exists for Bullock Wood SSSI.
- The ecological corridor is under-recognised.
- No cumulative assessment has been undertaken.
- The allocation fails to meet NPPF para 193(c) regarding irreplaceable habitats.

**A.31** Policy PP9 is therefore not environmentally sound, not justified, and not legally robust.

**A.32** A full suite of ecological field surveys, hydrological studies, and a revised SA are required before PP9 can be considered for allocation.

## Response

Site allocation Policy PP9 covers site options 10616a, 10616b and 10256a. These sites were appraised against the site assessment criteria set out within Appendix D of the SA report. The SA incorporates a proportionate, relevant evidence base that was available at the time of undertaking the assessment for all site options. The site assessment criteria were developed to ensure that any accessible environmental or spatial evidence could be reflected consistently across all site appraisals.

Detailed, site-specific ecological, hydrological, and site-specific survey work undertaken at the planning application stage or that has been submitted to the Council as part of the Call for Sites is disproportionately detailed for the SA of a Local Plan. However, the Council has taken such information into account in drafting site allocation policies such as PP9 and the SA considers whether the policy requirements alter the 'policy-off' effects identified by the SA of the related site options.

In relation to biodiversity, the sites were appraised based on to their distance to designated wildlife sites. All three site options scored significant negative effect, given the sites' close proximity to a SSSI and Local Wildlife Site.

## Mrs Jacqueline Williams

### A.33 Table 5.25

- Site 10256: Many of the scores allocated are too positive when taking CCC's evidence-based reports into account.

## Response

The SA of site options and site allocations relied on a consistent and proportionate evidence base that was available at the time of assessment. If any significant new evidence base becomes available then this will be taken into consideration within the SA Report.

## Mr David Williams

**A.34** Many of the scores allocated in Table 5.25 relating to site 10256 are too positive when the evidence from CCC's own reports is taken into account.

**A.35** The basis of this objection is that the scores to many of the policies are too positive based upon Colchester City Council's evidence-based reports, their content and omissions.

**A.36** Specifically:

- SA4 Transport; ECC traffic study states that even with a significant shift in modal transport to cycling, walking and public transport, there will still be congestion on the local road network. No where has any mitigation work to alleviate congestion been set out. The score should be changed from -to--.
- SA5 Community, Health and wellbeing. The loss of this site will have a significant adverse impact on the community who use this area for leisure activities will lose this to development. St John's Residents Association has produced foot fall survey to evidence the leisure use of this site, and it is included in their Objection Report. The score should be changed from+ to--.
- SA6 Services. The provision of new services, GP services, hospital facilities, schools, community centre, shops, is not mandatory, nor are

such services set out. Until both these criteria are met the score should be changed from+ to--.

- SA7 Historic Environment. There is a serious omission here in the CCC evidence-based reports. Site 10256 is part of the Langham High Plateau and has an association with the Landscape from the 1100s to today. I would draw your attention to the SSSI citation for Bullock (Sowan) Wood to evidence this historic association. The score should be changed from Oto--.
- SA9 Landscape. See comment for SA7 above. Also the landscape will be irreversibly harmed should housing development be permitted on this site. The score should be changed from-? to--.
- SA10 Climate Change. Climate change will impact upon this site through milder wetter winters resulting in increased rain fall. The unique feature of this site is its geology, loam topsoil overlaying a shallow layer of sand and gravel on London Clay. This results in the land being waterlogged during the winter, with a perched watertable being evident. This is essential to safeguarding Bullock Wood. Unusually for a proposed development site, surface water run-off needs to be held on site, and not drained away.
- SA11 Flood risk. See comment for SA10. Surface water flooding (perched watertable) is to be facilitated on this site. Flooding is therefore going to be a 'fact of life' on this site. The score should be changed from Oto--.
- SA13 Air Quality. Refer to comment for SA4. Traffic congestion will have an adverse impact on air quality. The score should be changed from -to --
- SA14 Water. There are significant challenges to provide potable water to this site, and to educate future inhabitants to use only 88l/person/day, when the average daily consumption is c135l. Until these issues are addressed the score should be changed from - to--.

## Response

The SA of site options and site allocations relied on a consistent and proportionate evidence base that was available at the time of assessment.

If any significant new evidence base becomes available then this will be taken into consideration within the SA Report.

The reasons for each of the scores are given below:

- Due to the high level nature of the SA, a distance based approach was used in appraising site options against a number of SA objectives. This has impacted the score for SA4, SA7 and SA13. The Local Plan will be supported by additional evidence base that will help to identify and mitigate any areas of concern within Colchester.
- The SA considered the loss of open space, sport, recreation facility, open country and registered common land in relation to SA5. However, it was identified that the development of site 10256 would not result in the loss of open space.
- In relation to SA6, the provision of new will infrastructure be dealt with through the Infrastructure Delivery Plan that supports the Local Plan.
- Development is likely to cause some level of harm to the local landscape. However, site 10256 was score minor negative as the impact on the landscape is not expected to be as severe due to its location within a medium landscape character area.SA9:
- Where surface run-off is a concern on the site, there will likely be on-site mitigation to relief this issue. This level of detail would come through any future planning application.
- The assessment of individual sites in relation to SA14: Water relates to water quality. The effects of the Local Plan in relation to water resources are discussed in chapter 6: Cumulative Effects of the SA, which includes recognition that Eastern England is severely water stressed. This issue will be further considered in light of the findings of the emerging Water Cycle Study at the next stage.
- All of these effects identified for the site option are 'policy off', i.e. based on the principle of development, before taking into consideration any mitigation or other detail provided by site allocation policy PP9 or future planning applications.

## Rik Andrew

**A.37** The appraisal of site options in relation to SA objective 4 has considered the potential for residents and site users to make use of more sustainable modes of transport Existing residents need to be persuaded not to drive – not just incomers.

**A.38** Colchester benefits from 3 existing railway stations and further stations at Wivenhoe, Marks Tey, Chappel & Wakes Colne. Most only get 1 train per hour – a major deterrent.

**A.39** A minor negative effect is expected in relation to this SA objective for around 40% of the residential site options... and around 70% of employment site options. Major negative surely ? A significant positive effect is recorded for only around 10% of residential site options

**A.40** Where there is a need to allocate sites in areas which are currently poorly served by public transport, there is potential to mitigate negative effects through the delivery of new public transport and active travel connections, in advance of or early in the delivery of development. No proposals to improve rail; very few to improve buses.

**A.41** Many LCWIPs are not viable e.g. Old Heath Rd-Barrack St !

**A.42** ...around half are less well related to a secondary school and over half do not benefit from good access to a town centre Another major negative

**A.43** Ensuring that congestion is mitigated as much as possible will be essential to ensuring economic growth and job creation 21,000 new jobs unlikely... most will commute

**A.44** A significant positive effect is expected for Policy PC2: Active and sustainable travel... given that it promotes the use and development of active

and sustainable travel modes Mersea, Rowhedge, etc do not have frequent buses. Nor is cycling into town an option. PC2 seeks to clarify and strengthen the policy approach relating to active travel in the plan. For example, it includes the additional requirements... that cycling infrastructure is designed to have regard for the latest best practice Head St junctions are poor; Seg.Track ends too soon.

### **A.45** East Hill NOT 'best practice' Nor is St.Botolphs rdbt

**A.46** Policy PC2 could be strengthened by setting out an approach that not only supports the provision of infrastructure for active and sustainable modes of transport but also encourages provisions that will support the use of these features by a range of users, including those with disabilities and older people. Wishful thinking... vague

- no real changes proposed
- Wivenhoe, Marks Tey, others have poor station access
- Monitoring indicators: SA objective 4 Very Weak
- Monitor modal splits via Census only every 10 years !
- To obtain an agreed Travel Plan for all major commercial/community developments does not guarantee modal shift actually occurs
- % of housing with efficient, easy & affordable access to key services by public transport but that % will be too low
- Bus patronage has declined: some run empty !
- what about rail? walking to school ? cycling to college ?
- Monitoring indicators: SA objective 5 Better but Incomplete
- Key infrastructure delivered through planning obligations
- Life expectancy not a short term measure !
- Obesity rates schoolchildren especially
- % of population having greenspace within 400m of home

- Length of greenways constructed. and other AT infrastructure

**A.47** Conclusion: 8.7 claims: "It is expected that the policies set out in the plan to achieve higher levels of travel by sustainable modes will also help to minimise negative impacts on air quality and help to mitigate climate change" – Unrealistic aspiration, unachievable given this Local Plan proposes:

- ZERO investment in rail: the District needs more frequent trains – especially on under used branch lines; all stations must be fully accessible, and we need new mainline stations.
- Little investment in our antiquated buses : old diesel DDBs should be replaced by cleaner, quieter, smaller, faster, electric buses, with two-doors to reduce stopping time, and no paying the driver.
- Bus services do not run late enough into the evening & are poor at weekends; yet fares are up 50% RTS-bus will not achieve significant modal shift – it could be upgraded to a Tram, which will.
- LCWIPs are unfunded & fragmented : Colchester does not / will not have a coherent NETWORK as per other towns e.g. Chelmsford; nor does it have a traffic free city centre as per e.g. Norwich, Leeds; and it is surrounded by major roundabouts – every radial route is stymied by a major barrier & deterrent – there are no proposals herein to make them all cycle safe & pedestrian friendly.

**A.48** Not only does this lack concrete plans to make sustainable transport attractive, the COST of rail at peak times is a deterrent: Colchester-Tendring... needs a prepaid Oyster card giving 30-40% discount to all ages as e.g. Bilbao; this could be (part) funded by ending free car parking at retail parks.

**A.49** I would also like to highlight page 223 of Transport Evidence which makes it clear that the very limited ST measures proposed will only reduce existing car trips by 1688 – nowhere near enough to mitigate the increase in peak traffic due to new housing of 5472.

## Response

The monitoring indicators will be continually reviewed as part of the SA process, and we will ensure that these indicators align with the monitoring framework within the Local Plan. The SA will also incorporate any new evidence base as it becomes available.

The SA is a high-level appraisal, and given the large number of sites assessed across the plan area, it applies a consistent, distance-based approach. This approach allows for a fair comparison of all sites but does mean that the SA cannot assess the quality, frequency, or reliability of individual transport services, as these factors change over time.

Some of the issues raised fall outside the scope of the SA. Where appropriate, however, the SA will make recommendations to strengthen policy wording to help enhance policy performance against the SA objectives.

The Local Plan itself will be supported by the evidence base available at the time of preparation.

## West Mersea Town Council

**A.50** The Plan now proposes an additional 300 dwellings at Dawes Lane, increasing total development pressure in West Mersea to approximately 600 dwellings, yet the SA continues to treat the sites in isolation, without cumulative or in-combination assessment, contrary to SEA and Habitats Regulations. Additional development increases load on the West Mersea Wastewater Recycling Centre (CSO), creating pathways for likely significant effects on the MCZ, SPA, Ramsar site, and SAC. The Plan should therefore explicitly assess

the MCZ, cumulative impacts, and CSO/wastewater effects, and reconsider whether the scale of development is consistent with SA Objective 8, Biodiversity harm scoring, and statutory obligations.

### Response

The SA includes an assessment of the cumulative effects of the Local Plan, including the Place Policies. Where relevant, the SA will also take into consideration the findings of the Habitats Regulations Assessment (HRA) to ensure that any potential impacts on European sites are appropriately reflected.

## The 2008 Angora Bare Trust (Cheffins)

**A.51** The 2008 Angora Bare Trusts agree with the overall findings of the SA in relation to the assessment of the draft allocation PP29.

**A.52** The SA states: Policy PP29 requires that the development of site 10226 and 10611 should be supported by a Minerals Resource Assessment. This requirement is likely to help support more efficient use of land and natural resources by preventing the loss of access to viable minerals in the plan area. However, the policy would not mitigate the loss of greenfield land and Grade 2 and 3 agricultural soils within the site. As such the significant negative effect recorded for the site in relation to SA2 remains applicable.

**A.53** We would like to make the observation that whilst the SLAA categorizes the land to the south of the village hall as comprising Grade 3b agricultural land, this does not appear to have been reflected in the Sustainability Appraisal has highlighted above. Grade 3 is subdivided into 3a and 3b, with 3b being at the lower end of versatile agricultural land. Thereby the loss of this area of

greenfield land as part of the draft allocation would have a lower overall negative effect in regard to efficient use of land.

**A.54** In line with SA4 and SA5, the indicative Parameter Plan submitted as part of this representation demonstrates that additional pedestrian connections can be achieved to the existing PROW network providing active travel links to the settlement and countryside. Alongside this, connections can be provided to the existing play area, located behind the village hall, as well as providing further opportunities for an additional play areas and open space, ensuring that future development contributes to enhancing existing and future residents health and wellbeing opportunities

**A.55** As highlighted in the previous section of this representation, Copford Parish Council have acknowledged our client's option of retaining and refurbishing the village hall (alongside additional parking) as opposed to its replacement. The village hall is conveniently located and one of the key development principles is to provide some additional car parking for the village hall which can also be utilised by the community such as parents dropping off and picking up for the local primary school. This in turn will help to elevate congestion along School Road associated during peak school drop-off and collection hours. There is a footpath that runs along School Road which provides a safe and convenient access route to the school which new links through the site will connect to.

**A.56** SA8 and SA9 require opportunities to be provided for green infrastructure, recreational access to the countryside and active travel links. To ensure that these objectives are incorporated, key development principles shown on the indicative Parameter Plan demonstrate that green buffers will be implemented along the site boundaries, reinforcing the site's landscape value and ensuring that the development can be sensitively integrated into the landscape to reflect character of the area. Alongside this, strategic open space will be provided, and landscape community spaces with links to connect to the wider network of public footpaths, ensuring that there is a contribution to habitat connectivity.

## Response

The comments on sites 10226 and 10611 are noted.

A high-level, policy-off appraisal was undertaken for all reasonable alternative site options, without taking into account policy mitigation. This approach ensures consistency and transparency by applying the same, mainly proximity-based assessment criteria to each site option and is proportionate in light of the strategic nature of SA/SEA of development plans and the large number of site options requiring assessment. Following this, a policy-on appraisal of allocated sites also considered the mitigation and requirements set out within the relevant Place Policies.

The SA did not take into consideration technical assessments or supporting evidence submitted for individual site options. Such evidence can vary significantly in scope and availability and reliance on it by the SA could introduce inconsistency, and potentially bias, into the assessment process. It would also be disproportionate to the strategic nature of SA/SEA. However, any such technical work was reviewed separately by the Council to help inform the decisions on which sites to take forward for allocation.

At the time of assessment, the GIS datasets available were not able to distinguish reliably between these sub-grades of Grade 2/3 land. As a result, the SA treated Grade 2/3 land as a single category. This data limitation is acknowledged within the SA.

## Manor Oak Homes & Charles Gooch (Ceres Property)

**A.57** Both the Site and the wider allocation (PP24) have been considered within the evidence base documents to the emerging Local Plan, including the SA Report (February 2025) which assesses whether the emerging Local Plan will help achieve sustainable development when compared with reasonable alternatives. The SA confirms that Wivenhoe is a sustainable settlement and has good infrastructure provision and is one of the four largest towns beyond the City of Colchester. However, it also indicates that the proportion of growth directed to Wivenhoe and West Mersea is lower than the other two larger settlements of Marks Tey and Tiptree owing to the internationally important biodiversity designations.

**A.58** At Table 5.36, a summary of the SA findings in respect of Policy PP24 is provided and expanded upon at Paragraphs 5.323 to 5.329. It is considered that this provides a fair assessment of the Policy based on the existing evidence base. It is noted that the conclusion is that no recommendations are proposed for any changes to the Policy. In respect of the assessment, some of the areas where negligible effects have been recorded, for example in respect of the SA7, SA8 and SA9 a higher score may well be achieved following the completion of the Site specific technical assessments currently being undertaken by the Promoters, which will provide further detail and clarification on the potential positive mitigation which can be delivered.

**A.59** In conclusion, it is considered that the SA provides a robust assessment of the proposed allocations and policies in the emerging plan. It has considered a comprehensive range of reasonable alternatives, identified suitable and relevant options, and as such, is supported.

## Response

Comments are noted

## The Dedham Vale Society

**A.60** There does not appear to be any mention of assessment work for the setting of the Dedham Vale National Landscape within the SA.

## Response

Any policies within the Local plan and site options were appraised against SA Objective 9: Conserve and enhance the character and distinctiveness of the landscape. One of the appraisal questions relates to: maintaining and enhancing the landscape character including the Dedham Vale National Landscape. In addition, development site options were appraised by reference to a Landscape Character Assessment that provided a high-level assessment of areas for inherent landscape value and sensitivities.

## Mrs Faith Hobbs, Mr Barry Hobbs

**A.61** The SA for Langham confirms key concerns about PP37. While minor positive effects are noted for community access and active travel, these benefits are assumed rather than evidenced. Crucially, infrastructure delivery — particularly wastewater, education, and transport — is not demonstrably achievable within the plan period. Flooding, water contamination, and residual impacts on landscape, heritage, and biodiversity remain, showing that policy mitigation is limited. Overall, the SA reinforces that PP37 is undeliverable,

ineffective, and poses significant environmental and community risks, supporting objections under NPPF paragraphs 20 and 161–163.

### Response

Policy PP37 sets out criteria in relation to the development of land north of Park Lane, Langham. The policy requires the provision of green infrastructure connections and recreational access to the countryside.

The policy also sets out requirements in relation to transport, water and wastewater while providing mitigation in relation to the impacts of development on biodiversity, heritage, landscape, flooding and water provision. The SA highlights that a number of the potential negative effects identified for the site on a policy-off basis have been mitigated by the requirements of Policy PP37 (see Table 5.46 and following text). the positive and negative effects of the policy. It is for the Council to decide whether to allocate the site in light of this and other evidence.

## Landvest and Harding Homes (Ceres Property)

### A.62 Land east of Layer Road

- In terms of the SA Report there are some areas in which the site is scored more negatively than is justified. A pre-application enquiry has now been undertaken on the site including technical reports which shows the site is fully deliverable and sustainable.
- In light of the above considerations including the sustainable location of the Site and the ability to develop residential schemes to take into account air quality and water resources sensitively, it is considered that the Site was marked significantly more negatively in the SA than it should bearing in mind the substantial benefits it offers in terms of a sustainable

residential site and the contribution it can provide to the local community in terms of supporting facilities and services.

- The Site has been assessed more negatively than justified, particularly given its sustainable location, strong relationship to the existing settlement, and absence of any fundamental environmental or technical constraints. The factors identified as constraints are in reality capable of being appropriately addressed through design, mitigation, and collaboration where necessary. The Site therefore represents a suitable, available, and deliverable opportunity for residential development that can make a meaningful contribution to local housing needs. Our client intends to consider to work with the Council to develop the design detail of the proposals and supporting plan work to support site promotion. On this basis it is considered that the site should be allocated in the emerging Local Plan.
- Land east of Layer Road represents a highly sustainable and deliverable opportunity to contribute towards Colchester's housing needs as set out at Policy ST5. Its proximity to existing and proposed allocations, combined with the absence of significant environmental or heritage constraints, makes it an ideal site for allocation.
- The SLAA and SA assessment should be revised to take into account the latest work and evidence as presented in this submission and in the previous pre-app which show the site is sustainable and deliverable. The allocation of the site will also support the wider allocation of land to the east at Berechurch Road, including improving active travel connections, whilst avoiding remaining independently deliverable without the need for wider masterplanning.

## Response

Site option 10515 Land east of Layer Road has scored negatively against some of the SA Objectives for the following reasons:

- The site is located on greenfield land (Grade 2 agricultural land)

- The site is not located within close proximity to either a town centre, district centre or local centre.
- The site is not located near a Public rights of Way or a GP Surgery.
- The site is located in close proximity to Gosbecks Iron Age and Romano-British Site Scheduled Monument.
- The site is located in close proximity to a Local Wildlife Site
- The site is located within a Landscape Character Area considered to have medium inherent landscape value.
- The site is located in an area with higher pollutant concentrations for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>.
- The site partly falls within Source protection Zone 2 or 3.

Mitigation proposed through the pre-app and site evidence base is not able to be considered as part of the SA of site options. As explained in Chapter 4 of the SA report, in order to ensure that all site options were appraised on a consistent and proportionate basis, all site options were appraised on a 'policy-off' basis, prior to consideration of mitigation. This approach served to highlight potential effects on the environment and potential gaps in existing services, facilities and sustainable transport links. The Council has taken this and other relevant information into account in deciding whether to allocate sites.

## Environmental Law Foundation

**A.63** The SA correctly records that the site is within 1km of Blackwater Estuary SPA, Ramsar and SSSI (para. 5.321, p.406). However, no reference is made to the proximity to the designated shellfish waters of the Colne, Pyefleet, Strood, Salcott Channel, Blackwater and Dengie or the hydrological connection the West Mersea WRC has to the Essex Estuaries SAC. As such, the proposed ecological mitigation measures - namely, enhancement of retained grassland,

delivering of standing freshwater habitat to support the Essex LRNS and requirements for development to avoid impacts on overwintering birds - fail to provide any mitigation to the risks identified in the WCS Technical Note in terms of the potential impacts on the Essex Estuaries SAC, the MCZ and the designated shellfish waters.

### Response

The separately prepared HRA will consider the impact of any policy or proposed development within the Local plan and how it will impact any Habitats Site, including Essex Estuaries SAC. If required, mitigation will be proposed through the HRA to ensure that adverse effects on the integrity of Habitats sites are avoided.

The Council's attention is drawn to the other issues raised to consider the need for further evidence or policy mitigation re. potential impacts on the MCZ or designated shellfish waters.

## Mr Mike Williamson

**A.64** The SA report for PP29 at table 5.40 is hardly a glowing report for the proposed site at School Road. The only positive finding appears to be the fact the houses will be built. In almost all of the other criteria considered by LUC, particularly SA2 and the loss of good grade agricultural land, the effect is negative. How can this site be good for this Parish?

### Response

Given the limited available brownfield land within Colchester, the take up of some greenfield land will be required to support the growth strategy.

The SA provides an evidence base to support the Council's decision in choosing the most sustainable site options. The Council will outweigh the positive and negatives of each site but development will likely result in some negative effects on the environment. Appropriate mitigation will be provided within the Local Plan to ensure the negative effects of development are kept to a minimum.

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**A.65** Appendix C includes the results of the site sustainability appraisals, but does not offer visibility of the site assessment criteria and assessment methodology, for which one has to visit Appendix D in the Evidence Base. Meaningful consultation must necessarily allow one to comment on the methodology used to produce the results in Appendix C, so this representation focusses on the methodology documented in Appendix D, and in particular the methodology used to assess sustainability measure SA4 and SA5 for all sites across Colchester, particularly PP37 site allocation.

## **A.66** SA4 :

- The only 3 scoring metrics used to assess the level of compliance relate to distances from the nearest rail station, bus stop and cycle route. There are no scoring metrics relating to proximity of likely travel destinations. The scoring methodology is therefore flawed and "one-sided", since all journeys need both a travel mode and a travel destination. This flawed methodology introduces a systemic bias into all the site sustainability appraisals, producing unrealistically favourable results for more rural and remote sites situated far from amenities and essential services.
- A better scoring metric for SA4 would be to directly adopt the DfT Connectivity Tool, which considers both travel modes and travel destinations, giving a fairer and far more balanced appraisal. This Connectivity Tool is in fact mandated for use in the draft new NPPF currently out for consultation, so it would make sense for CCC to review

and update the Sustainability Appraisal to incorporate this now, because the Secretary of State for Housing announced in December 2025 that once the new NPPF is adopted, any local plans approved under an earlier NPPF that is not consistent with the emerging NPPF (once adopted) will be given very little weight. If the DfT Connectivity Tool were to be utilised, it would likely call into serious question the soundness of several of the large proposed allocations across Rural North Ward.

### Response

Noted.

Appendix C of the SA Report contains the baseline information. The site assessment criteria are documented in Appendix D and the results of the appraisal of the site options in Chapter 4 of the main SA Report.

As noted, the Department for Transport Connectivity Tool was published after the site option appraisal work for the Colchester Local Plan had already been undertaken. Furthermore, the platform is a beta version and does not readily allow third parties to access the underlying data or export results for large batches of sites, as would be required for its use in the SA of large numbers of site options. For these reasons, it is not practical to amend the SA methodology used for site appraisal at this point in the process.

Proximity to key travel destinations is considered under other SA objectives and related site appraisal criteria, e.g. 3d Access to jobs, 3e/6a Town centres, 5a Open space, 5d GP surgeries, 6b/6c Schools.

## Langham Parish Council

### A.67 SA5

- A composite assessment of 7 scoring metrics is used to assess the level of compliance.
- The PP37 site is given a composite + rating across these 7 metrics. Based on the overall scoring schema, we infer that the scores for the individual metrics must have been as follows:
  - A) ++
  - B) 0
  - C) ++
  - D) –
  - E) 0
  - F) 0
  - G) 0

**A.68** We would question the validity of the scores for metrics b) and g).

**A.69** A 0 score for b) would fail to recognise the total loss of open space and rural PRow network resulting from the allocation.

**A.70** A 0 score for g) appears totally inconsistent with the stated intention to provide an on-site sewage treatment facility.

**A.71** We would appreciate clarification of, and an explanation of, the actual scoring used in the sustainability appraisal of metric SA5 for the PP37 site.

**A.72** It is Langham Parish Council's view that SA4 and SA5 should have been assessed as – rather than +, in which case the single remaining positively scored metric (out of a total of 14) would be SA1.

**A.73** If this is indeed the case, then it calls into question whether due weight has been given to the SA when selecting site 10664 for inclusion in the Local Plan.

## Response

The scores are as follows for Site option 10664 under SA Objective 5:

- A) ++
- B) –
- C) ++
- D) –
- E) 0
- F) 0
- G) 0

Regarding the methodology applied to SA4 and SA5, the SA has assessed all site options using the criteria set out in Appendix D of the SA Report. As part of this, scores for each sub-criterion are totalled and averaged to provide an overall significance rating, ensuring that no single issue outweighs the rest. All of these effects identified for the site option are 'policy off', i.e. based on the principle of development, before taking into consideration any mitigation or other detail provided by site allocation policy PP37 or future planning applications.

Against criteria 5b, the site scores minor negative as development of the site would result in the loss of a small portion of open space, sport, recreation facility, open country or registered common land.

The appraisal of the site against criteria 5g is based on the principle of development of 900 homes and does not take into account any infrastructure required by Policy PP37 or a specific proposal for the site. Policy PP37 requires proposals to demonstrate adequate capacity for managing wastewater including proposed phasing requirements or alternative solutions to the satisfaction of the Council and Anglian Water. The site promoter is developing plans for a private WRC as there is no capacity at Langham and no plans in the current AMP.

## Boyer

**A.74** Colchester Council has considered several approaches to the growth to develop options for the spatial strategy for growth in the plan area. The approaches were not subject to SA. The spatial approaches that were used by the Council to inform the development of the options are: Substantial Growth – Garden Communities and Suburbs, Hubs and Spokes Model, Environment Led, Transport Corridors, Expand and Regeneration of Colchester urban area, Proportionate Growth, Community Gain. The majority of information relating to West Bergholt are within Option 5 or 6.

**A.75** Option 5: Transport Corridors have identified strength and weaknesses for the options for the spatial distribution of growth in the District.

### ■ Strengths:

- Opportunity to connect to the Rapid Transit System (RTS);
- Good access to the strategic road network;
- Support regeneration in the urban area;
- Good access to employment areas and centres;
- Attractive to investors;
- Increase access to sustainable transport modes;

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- Development along the A12 likely to have less impacts on biodiversity than other locations;
- Opportunities for improving the relationship between the settlement edge and surrounding countryside.
- Weaknesses:
  - Good access to the strategic road network over access to public transport could lead to a high number of journeys being made by private vehicle;
  - Less distribution of growth within Colchester's villages;
  - Loss of greenfield land;
  - Adverse effects on historic environment;
  - Impacts on local landscape character;
  - Development in north Colchester could adversely affect Dedham Vale National Landscape.

**A.76** Option 6: Hubs and Spokes. The majority the information relating to West Bergholt in the SA is within option 6, discussing hubs and spokes. The SA has provided both strength and weaknesses for the options for the spatial distribution of growth in the District.

- Strengths:
  - Recognises the relationship between Colchester's settlements;
  - Helps to sustain services and facilities within Colchester's settlements
- Weaknesses:
  - Does not take account of Wivenhoe, as Wivenhoe's 'spokes' are in Tendring;
  - Loss of greenfield land;
  - Development on Grade 2 and 3 soils;
  - Less likely than other options to lead to regeneration;

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- Less supportive of growth in the City Centre;
- Range of services and facilities is more limited in the hubs than the urban area;
- Only a few hubs have both school and healthcare provision;
- Adverse effects on the historic environment;
- Likely to result in harm to biodiversity at a number of locations through the inclusion of hubs for development at West Mersea and Marks Tey;
- Development in villages in the north could adversely affect Dedham Vale National Landscape.

**A.77** In respect of West Bergholt and the location of Hopkins Homes land interest, we recognise that the Council through the SA have identified West Bergholt as a sustainable settlement that has a key role to play in delivering the spatial strategy proposed at this stage.

**A.78** The SA is clear that much of the development is directed towards the most sustainable and accessible locations which provides many residents with good access to the necessary services and facilities. We acknowledge that the SA has considered each policy against the SA objectives set out and recommend that the Council continue to monitor and assess these as the plan evolves in response to consultation representations and the Regulation 19 stage.

**A.79** West Bergholt performs well as a sustainable settlement when judged against the SA objectives and we would anticipate this to remain as the plan evolves. PP43 also performs well as a site allocation when considered against the SA objectives as detailed within the documentation supporting the consultation.

**A.80** As noted in our responses to the policies, we are concerned that there may be some internal conflict between strategic policies and the site-specific policies and also with national policy or legislation such as the Building Regulations. The SA is the most appropriate route to consider the relationship between emerging policies, and the Council should continue to develop their

plan alongside emerging evidence and continually undertaking the SA considerations.

### Response

Comments in relation to West Bergholt are noted.

The SA is an iterative process and will continue to be updated as the Local Plan progresses. As further policy refinement, updated evidence, and consultation responses become available, these will be incorporated into future iterations of the SA.

The SA will appraise all policies within the plan, including site-specific and strategic policies. In addition to individual policy appraisals, the SA will also consider the cumulative effects of all policies to provide an understanding of how the plan performs as a whole.

## Welshwood Park Residents Association

**A.81** The SA has assessed the wider allocation as Farm Buildings (Ref: 10256 and 10256a - presumably this is the same as St Johns Road given the same SHLAA reference?) and 'Land North of Bromley Road' (Ref: 10616). It appears (from mapping provided in the SA) that 'Welshwood Park (Ref: 10616a) and Land North of Bromley Road (Ref: 10616b) have been assessed as part of the SA, but to reiterate, were are not assessed as part of the SHLAA.

**A.82** Individual sites (refs: 10616, 10616a and 10616b) were assessed against the SA Objectives. The allocation of these sites were assessed as having a minor negative effect on SA2, SA6 and SA13. Potential significant adverse effects were identified in relation to SA8 and SA9.

**A.83** With specific reference to biodiversity, appendix C of the SA, misunderstands nature conservation legislation. In paragraph C.90, on page 80, it states that Local Nature Reserves (of which Welsh Wood is one) is a non-statutory nature conservation site. This is incorrect as a 'Local Nature Reserve' is a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949. This error may have resulted in the impacts on Welsh Wood not being categorised correctly. Furthermore, the assessment criteria for biodiversity in Table D8, page 112-113, omits to include veteran trees as ecological features which might be harmed by development.

**A.84** The detailed assessment of PP9 as set out on pages 355 – 359 given a significant negative score for biodiversity, the lowest possible. However, even after considering mitigation in policy PP9, it still scored negative for biodiversity, indicating that full mitigation isn't possible. The appraisal (paragraph 5.250) confirms that harm to Welsh Wood (LNR/Local Wildlife Site / Ancient Woodland) and Wall's Wood (Local Wildlife site and part Ancient Woodland) is reduced but not prevented. Veteran trees are not mentioned as part of the assessment, nor is the newly identified remnant of Welshwood Park historic parkland (see paragraph 2.40), which is a significant oversight.

**A.85** It is also noted that other sites promoted for development within the Local Plan have been rejected, due to harm to woodland biodiversity. Given the existing context and designations on and adjoining PP9, it appears inconsistent that PP9 this has not been discounted for similar reasons.

**A.86** While high level general mitigation measures are discussed in the SA, as will be set out in this representation, detailed information/evidence is provided to demonstrate that the constraints identified by the Council in both the SA and SHLAA need to be considered in far more detail. It is Welshwood Park residents view that the evidence presented in this representation acts to undermine the deliverability of proposed allocation PP9 as currently drafted. The evidence provided in this representation clearly demonstrates that areas of the proposed allocation are in need of protection and enhancement and are not suitable for any development, certainly not at the scale currently proposed. It is Welwood Park residents view that the policy PP9 needs to be significantly modified to respond to the evidence presented and ensure that it is 'sound'.

## Response

Data on Local Wildlife Sites and Local Nature Reserves used within the SA was supplied directly by the Council, based on the datasets available at the time of assessment. Paragraph C.91 refers specifically to Local Wildlife Sites, which are non-statutory designations. We acknowledge that this could have been clearer, and the wording will be refined in a future iteration of the SA.

A comprehensive, digital dataset relating to veteran trees was not available to inform the SA of all site options, and therefore these were not included within the appraisal framework.

Decisions regarding the allocation of specific sites sit with the Council through the Local Plan process. The SA's role is to inform that decision, alongside other evidence, by identifying the positive and negative environmental and social effects of each policy or site.

## Defence Infrastructure Organisation

**A.87** The SA identifies several key risks and issues associated with the proposed housing allocations. While the following are considered and scored, there are significant risks which have not been fully considered and addressed through the SA and the Local Plan itself. These are as follows:

**A.88** The spatial strategy (Policy ST3) directs much of the development required to the urban area and the larger settlements that sit directly below this in the settlement hierarchy and supports the re-use of previously developed land. However, this is not correct and significant amounts of development are also directed to greenfield sites in village locations that comprise best and most

versatile agricultural land, particularly to the north and west of the main urban area. It is notable that the Tendring Colchester Borders Garden Community comprises a large greenfield site that takes in areas of Grade 1 and 2 agricultural soils. This is also particularly the case on settlement edges and strategic growth locations such as Marks Tey, Tiptree, and Langham. This represents a substantial adverse impact, for which full mitigation may not be possible given the scale of development required and is directly referenced in the SA report. The plan does not identify a robust mitigation strategy for the full loss of this land; instead, it suggests directing the lowest levels of growth to the highest sensitivity areas but concedes this cannot wholly avoid the impact due to development requirements.

**A.89** Colchester is classified as ‘seriously water stressed’ and projected housing growth will increase overall water demand and wastewater generation. Some allocations are within water protection zones, raising pollution risks. The capacity of water resources and wastewater infrastructure is not conclusively established; flood risk persists at some sites, notably in the Hythe area and parts of Mersea and Marks Tey.

**A.90** The scale and distribution of planned housing places significant pressure on educational, health, transport, and community infrastructure. Larger new sites require substantial supporting investment to avoid congestion and capacity issues with key services. The SA concedes there are “uncertainties to effectiveness of delivery”, especially for large, infrastructure-dependent allocations. In some cases, infrastructure phasing, funding, or detailed solutions remain to be worked up, with the risk placed on future masterplanning

**A.91** Edge-of-settlement and strategic allocations may adversely affect rural landscape character, visual amenity, and the distinctiveness of settlements. Areas such as Dedham Vale National Landscape, Dedham, Mersea, Langham, and Marks Tey are identified as particularly sensitive. The Plan includes landscape and green infrastructure policies, requirements for masterplanning and screening, and the intention to focus growth in less sensitive settlements. However, the SA admits that “full mitigation may not be possible given the scale of development required,” and some area-specific policies still score adversely

or as uncertain in the Appraisal, particularly in relation to Dedham Vale and the rural/urban fringe

**A.92** Delivery risk is highlighted for large-scale and complex sites (e.g., Garden Communities), particularly in relation to infrastructure dependency, lead-in times, and effective phasing. Ensuring a continuous and sustainable housing trajectory will require robust masterplanning and coordination.

**A.93** The SA identifies a number of negative effects have largely been identified in relation to the substantial land take required to support the level of development over the plan period and the location of development in relation to sensitive environmental receptors. Furthermore, much of the development beyond the urban area will be on greenfield land. This includes the development of the large-scale development at the Tendring Colchester Garden Community as well as further large-scale sites at Marks Tey, Tiptree, and Langham. Furthermore, the District contains large areas of Grade 2 and 3 agricultural soils and many of the sites proposed for allocation lie within these areas.

**A.94** Our client therefore objects to the SA as currently drafted. The SA underscores substantial challenges, particularly regarding environmental impacts, infrastructure capacity, landscape protection, and the potential for localised adverse effects. Addressing these risks will require ongoing evidence gathering, site-specific safeguards, professional masterplanning, and proactive infrastructure investment which all come with significant uncertainties. The SA therefore acknowledges significant risks to the Plan's deliverability and recognises uncertainties regarding the effectiveness of reliance on the strategic allocations as currently drafted. It also highlights negative scores or uncertainties for landscape, biodiversity, water management, and public transport for some sites.

## Response

The greenfield land take and the potential loss of higher quality agricultural land associated with the preferred spatial strategy (Policy ST3) is identified

at para. 5.41 of the SA Report. A variety of other potential environmental effects are also identified by the SA, as noted by the consultee.

The SA is able to assist in comparing the reasonable growth strategy options and identifying which approaches are likely to be the most sustainable. However, even the most sustainable option will still require some take-up of greenfield land in order to meet the housing needs of Colchester over the plan period. All growth options supported development across the wider Colchester area, while also focusing higher levels of growth in particular locations to ensure a deliverable spatial strategy.

Further evidence base work will continue to support the Local Plan, including transport, infrastructure capacity, environmental, and utilities evidence. This will help ensure that necessary infrastructure can be planned and delivered alongside development. Where negative environmental effects are identified, mitigation measures will continue to be recommended by the SA so that the Council can consider whether these can be incorporated through Local Plan policies to minimise impacts.

## Natural England

**A.95** Natural England welcomes the discounting of Middlewick Ranges as a site allocation in the Colchester Preferred Options Local Plan, and the rationale provided:

**A.96** Development of the site is likely to significantly harm biodiversity. The site is almost all LoWS, woodland and acid grassland Priority Habitat, corridor of Birch Brook. Recent ecological evidence has provided extensive updated information supported by Natural England.

**A.97** As noted, above we welcome the proposed new enhanced biodiversity and open space dedication on this land, to ensure its importance is recognised in the long-term. Our advice is that its delivery should be secured through the relevant Local Plan policy.

**A.98** We note that alternative 10953a (larger site including additional land to the south towards Weir Lane) was also considered. We assume that alternative site 10953a is also discounted.

### Response

Comments are noted.

## Cala Homes (Isabel Ede)

**A.99** The SA evaluates the social, economic, and environmental impact of all suitable sites, proposed spatial options and reasonable alternatives. This section of discussion seeks to comment solely on the appraisal of the Site (reference 10760), Land north of Halstead Road and east of Wood Lane (reference 10656) and Land north of Halstead Road and west of Fiddlers Wood (reference 10090).

**A.100** The SA aims to evaluate the environmental, social, and economic effects of different site allocations. However, the scoring of the three assessed sites- 10760 (Land South of Halstead Road), 10656 (PP31) (Land north of Halstead Road, east of Wood Lane), and 10090 (PP32) (Land north of Halstead Road, west of Fiddlers Wood)-does not accurately reflect the comparative merits of each location. The only elements that distinguish Site 10090 (PP32) in the SA are its minor or potential minor adverse impacts against SA7, SA5, and SA9, yet the technical evidence provided in Section 3 contradicts this assessment. Similarly, Site 10656 (PP31) is scored more positively for Transport (SA4),

despite clear evidence within the Transport Technical Note that demonstrates otherwise.

**A.101** This level of exposure is a direct consequence of the site's elevated and open landscape context, rather than the absence of design mitigation at this stage. As such, the scale of landscape harm associated with Site 10090 (PP32) is inherent to the site itself and would persist irrespective of future masterplanning or planting proposals. The extent of visual intrusion, particularly when viewed from surrounding public rights of way and the wider countryside, indicates that development would result in a pronounced and irreversible change in character. In contrast, Site 10760 benefits from a more contained and defensible landscape setting, where development can be integrated in a manner that respects existing settlement form and limits the perception of urban encroachment.

**A.102** In contrast, Site 10760 benefits from strong boundary vegetation that provides a natural screen, ensuring that development integrates into the landscape more effectively. The LVIA identifies that Site 10090 (PP32) would require substantial mitigation, including extensive tree planting and green buffers, which are not inherent site characteristics but rather burdens on viability and deliverability. Given this, Site 10760 should have received a more favourable landscape score (SA9) than Site 10090.

**A.103** In terms of SA5, the Ecology Technical Note in Section 3 highlights that Site 10090 (PP32) is adjacent to Ancient Woodland and requires significant buffer zones to mitigate ecological harm. The presence of protected species and priority habitats places additional constraints on development. Site 10760, on the other hand, can deliver around 20% BNG on-site without the need for extensive mitigation, an achievement that Site 10090 (PP32) is unlikely to match given its ecological constraints. On this basis, it is considered that SA should have reflected the fact that Site 10090 (PP32) presents a higher risk of ecological harm and a lower likelihood of achieving meaningful biodiversity enhancements compared to Site 10760. In this context, the Sustainability Appraisal does not appear to have applied sufficient differentiation between sites that merely require ecological enhancement and those, such as Site 10090 (PP32), where development must first avoid and mitigate harm to

irreplaceable habitats before any net gain can be contemplated. The need to prioritise avoidance and buffering around Ancient Woodland significantly constrains the scope for meaningful on-site biodiversity enhancements and increases the risk that biodiversity outcomes will be marginal or displaced off-site. By contrast, the ability of Site 10760 to deliver substantial on-site Biodiversity Net Gain reflects its comparatively unconstrained ecological baseline. This distinction is material and should have been more clearly reflected in the appraisal of reasonable alternatives, particularly given the emphasis in national policy on minimising harm before relying on mitigation or compensation.

**A.104** Regarding the SA7, the Built Heritage Note referred to in Section 3 clarifies that Site 10090's (PP32) proximity to sensitive heritage assets poses a greater risk of impact than suggested by the SA scoring. Unlike Site 10760, which has no intervisibility with nearby heritage assets, Site 10090 (PP32) is closer to historic features and requires mitigation to minimise harm to their setting. The SA's assertion that Site 10090 (PP32) presents only a minor or potential minor adverse impact on the historic environment is therefore misleading. Site 10760, with its lack of direct impact on heritage assets, should be scored at least equally if not more favourably than Site 10090 (PP32).

**A.105** The SA also distinguishes Site 10656 (PP31) as performing better in SA4, but the Transport Technical Note provides clear evidence to the contrary. While Site 10656 (PP31) benefits from proximity to bus stops, it is not significantly better connected than Site 10760. Site 10760 is adjacent to Halstead Road, with existing pedestrian infrastructure and frequent bus services linking to Colchester and surrounding areas. The proximity of Site 10760 to the A12 further enhances its strategic connectivity, making it an efficient location for development. In contrast, Site 10090 (PP32) faces greater accessibility constraints, requiring additional infrastructure investment to improve pedestrian and transport links. The SA does not account for these disparities accurately, and the transport scoring should be revisited to reflect the stronger credentials of Site 10760.

**A.106** The Colchester Infrastructure Audit and Development Plan (October 2025) sets out the active travel routes that are key to the Local Plan's growth

mitigation package. In addition, it identifies the need for a network of mobility hubs across Colchester. This includes the following:

**A.107** The Further Transport Evidence (October 2025) expands on initial transport evidence published in February 2025. This evidence found that the A12 Junction 26 operates over-capacity and considers that the junction experiences peak hour queueing. Development in the area will add pressure to the network and measures are likely required to help mitigate this impact.

**A.108** In summary, the SA does not robustly assess the comparative sustainability of these three sites. The scoring fails to reflect the evidence presented in Section 3, particularly regarding landscape, biodiversity, heritage, and transport. A reassessment of these categories should result in a more accurate representation, reinforcing the case that Site 10760 is at least equal to, if not superior to, Site 10090 (PP32) and Site 10656 (PP31) in sustainability terms. The evidence clearly supports the allocation of Site 10760 as a more appropriate and sustainable development location within the Local Plan.

### Response

A high-level, policy-off appraisal was undertaken for all reasonable alternative site options, without taking into account policy mitigation. This approach ensures consistency and transparency by applying the same, mainly proximity-based assessment criteria to each site option and is proportionate in light of the strategic nature of SA/SEA of development plans and the large number of site options requiring assessment. Following this, a policy-on appraisal of allocated sites also considered the mitigation and requirements set out within the relevant Place Policies.

The SA did not take into consideration technical assessments or supporting evidence submitted for individual site options. Such evidence can vary significantly in scope and availability and reliance on it by the SA could

introduce inconsistency, and potentially bias, into the assessment process. It would also be disproportionate to the strategic nature of SA/SEA. However, any such technical work was reviewed separately by the Council to help inform the decisions on which sites to take forward for allocation.

### Gleeson Land Limited (Cere Property)

**A.109** As part of this Regulation 18 Consultation, a SA Report has been provided for review and comment. This latest report considers the site-specific policy text following earlier "policy-off" appraisals. This ensures that mitigation sought through the proposed policy wording is therefore now reflected in the assessment.

**A.110** The majority of assessments remain the same, apart from Economic Growth which improves to a minor positive, from a minor negative. Biodiversity and geodiversity also improves to a minor negative from a significant negative. We support this further consideration of these site constraints.

**A.111** Whilst the assessment remains unchanged, we continue to have concerns over the recording of a significant negative effect for the site (Policy PP9) in relation to SA2. This is based on the loss of greenfield land and Grade 2 and Grade 3 agricultural soils. The majority of agricultural land around Colchester is in fact Grade 2 or 3 and thus not considered a scarce resource. Additionally, some areas are Grade 1 and therefore it would be expected that development in these locations would be seen to have the most significant negative impact but there is no greater. Given that this would apply to the majority of allocations for the City, it is considered disproportionate to consider this as a significant negative effect and a categorisation as a minor negative effect would better reflect this constraint.

## Response

Noted.

It is acknowledged that there is a high amount of Grade 2 or 3 agricultural land within Colchester. However, Grade 2 or 3a agricultural land is regarded as the best and most versatile land therefore requires a higher protection. Therefore, a significant negative effect score for sites that result in the take up of a large amount of Grade 2 or 3 agricultural land is considered acceptable. It also helps to distinguish between development that is on brownfield land or greenfield land.

## Marks Tey Parish Council

**A.112** The SA/SEA identifies the Marks Tey Growth Area (§2.80 etc) and states that "The policies reflect the fact that it is not anticipated that all the growth promoted can be accommodated without significant upgrades to the A12 and A120. The Growth Area designation is intended to demonstrate that some development would be acceptable within the overall sites, subject to further evidence."

**A.113** The Growth Area is then assessed as the New Garden Community (Option 2) and as part of a number of the Spatial Options: Garden Suburbs, Transport Corridors and Hubs & Spokes. The SA/SEA concludes that "The delivery of (Marks Tey) could achieve critical mass to support the delivery of substantial new infrastructure". Its uncertainty as to whether or not the proposals will achieve this goal is compounded by its view that "The potential benefits of including an additional Garden Community in the plan area would need to be weighed against the potential difficulties of start up, delivery, appropriate phasing of new infrastructure and longer term issues of place making" (§4.155).

**A.114** There is no assessment of the Growth Area as a distinct set of proposals (as it is not a standalone policy); instead It separately assesses each of the four site allocation policies in §5.300 etc. As the details of each policy are unknown it identifies a series of uncertain positive and adverse effects across most of the assessment themes. Where the potential for positive effects is identified - for example in the delivery of new infrastructure or managing traffic - it acknowledges the proposals are very broad. Similarly, where it identifies the potential for harm across a range of environmental matters - noise and air pollution for example - it cannot offer firm mitigation measures.

### Response

The SA/SEA identifies the Marks Tey Growth Area (§2.80 etc) and states that "The policies reflect the fact that it is not anticipated that all the growth promoted can be accommodated without significant upgrades to the A12 and A120. The Growth Area designation is intended to demonstrate that some development would be acceptable within the overall sites, subject to further evidence."

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## Essex County Council Spatial Planning

**A.115** The SA at this stage is considered robust and thorough. Its identification of notional Spatial Strategy options and the consideration of sites within those previously appraised is suitable and the findings adequately evidence base for the Regulation 18 Preferred options stage.

**A.116** ECC welcomes the inclusion of transport considerations within the SA, with the recommendations to enhance connectivity through improving sustainable links welcomed. It is noted that the current framework does not fully reflect Essex's emerging transport priorities under LTP4. The LTP4 is scheduled for adoption in early 2026 and will need to be reflected in the Regulation 19 stage, particularly policies on sustainable transport, dynamic traffic management, mode share targets & monitoring, and integration of land use and transport planning.

## Response

Noted. Reference has been made to LTP4 in the SA at Reg. 19 stage.

## Bidwells

**A.117** The Council should correct inaccuracies in the evidence base which appear to have led to the non-allocation of site 10514 from the Plan. In doing so it should update the SA to take account of mitigation proposed as part of the masterplan proposals on 10514 that accompany these representations.

**A.118** We note that Appendix E of the SA (February 2025) and the Summary of Evidence paper (October 2025) provide rationale for discounting site 10514 which can be distilled into two principal reasons. Based on the above, impacts on biodiversity and flooding are identified as reasons why the site is discounted.

**A.119** Taking biodiversity first – the SA states that “development of the site is likely to significantly harm biodiversity as the site is adjacent to Marks Tey Brickpit SSSI (geological) and c.55m from Marks Tey Brickpit LoWS. Furthermore, it contains Priority habitat watercourse (Roman River).” It should be noted that the Local Plan Topic Paper – Site Allocations: Process paper (October 2025) states at paragraph 3.17 that the “Colchester Biodiversity Assessment considered all reasonable sites and identified likely harm to biodiversity. Sites identified as likely to significantly harm biodiversity have not been allocated in the Preferred Options Local Plan. A few sites identified as likely to harm biodiversity have been allocated where the evidence indicates that harm can be avoided or mitigated, for example by amending the site boundary or requiring buffers to adjacent Local Wildlife Sites.” Based on the above, the “significant harm” threshold appears to set a benchmark by which sites could be discounted.

**A.120** There does not appear to be an evidence-based approach as to why a “significant harm” assessment has been attributed to the Site. The Strategic Land Availability Assessment Methodology Paper (December 2023) provides a Red/Amber/Green Assessment scoring system by which sites should be appraised.

**A.121** Site 10514 is not located within a Local Wildlife Site, Local Nature Reserve or Coastal Protection Belt. Its western edge is located adjacent to but wholly outside of a SSSI, so would therefore score a “Green” in the RAG assessment. Additionally, the evidence on which the accompanying masterplan proposals have been formulated finds no natural or historic environment designation related reason for discounting the Site.

**A.122** A Preliminary Ecology Review (prepared by Essential Ecology) confirms that the Site is suitable for development from an ecological perspective subject to the implementation of its recommendations and further species-specific surveys. The opportunity exists to bring forward biodiversity benefits which would not be brought forward in the absence of proposals. In respect of geological significance of the Marks Tey Brickpit SSSI, two specific evidence base studies have been commissioned by Mr Hines covering this matter:

**A.123** Initial Geodiversity Statement (prepared by Harrison Geotechnical) identifies that the site abuts Marks Tey Brick Pit SSSI, the nature conservation interests of which relate to its geological assets. The study identifies that development would have no direct or indirect impact on active or disused pit or quarry lacustrine deposits lying within the SSSI boundary. However, there is likely to be direct or indirect impact on finite buried category lake deposits and Palaeolithic archaeology in the areas outside the SSSI boundary. The Initial Archaeology Assessment below takes this matter further.

**A.124** Initial Archaeology Assessment (prepared by Andrew Josephs Associates) identifies that there are no over-riding constraints to the promotion of the Site for development. It identifies that the wider landscape is quite rich in archaeology, in particular of Roman date. The overall potential for buried archaeology within the Site is moderate. Intensive ploughing across the proposed development area will however have truncated that which is present, so preservation is likely to be of low-moderate quality. As identified in the Initial Geodiversity Statement referred to above, the locality is well known for its Palaeoenvironmental and Palaeolithic archaeological potential, so further palaeolithic and geoarchaeological investigations were also carried out under the banner of the archaeology assessment. The evaluation work identifies an approximate location where the highest potential exists for palaeolithic

archaeology that could be preserved in situ. Not only are there no over-riding constraints to development, but there are also significant opportunities to increase our knowledge of the Hoxnian period as well as that of palaeolithic peoples – a research priority in English archaeology – whilst preserving the most sensitive locations within the site, providing educational opportunities within the proposed development. Further field-based evaluation would be required.

**A.125** The extensive evidence base undertaken in support of the Site confirms that proposals would not give rise to “significant harm” because they are capable of being appropriately addressed as part of a masterplan scheme, but this does not appear to have been considered. Furthermore, the development of the site has the potential to deliver educational and recreational public benefits, which are included as part of the masterplan. There is therefore no evidence-led reason why the site has been attributed a “significant harm” assessment in the Council’s evidence base.

**A.126** The SA states that a “significant portion of the site is located within Flood Zone 2 and 3.” The proportion of land within the flood zone should not in itself be a reason to discount the site, particularly when the remainder of the site could appropriately accommodate major residential development proposals of circa 136-160 new homes. Additionally, paragraph 3.1 of the SLAA Methodology paper states that “one RAG assessment does not necessarily rule out the site from further consideration”, so the SA should not identify it as a reason for discounting the Site. The Framework Masterplan contained within the Vision Document is informed by a Flood Risk and Drainage Appraisal and it shows how major development proposals could be delivered in a manner that would not be affected by the parts of the site that are affected by Flood Zone designation. The total site area put forward in the Call for Sites is 13.95 hectares but a benefit of its size is that it has a gross developable area of 4.65 hectares (approximately 33%). The northern parcel is entirely within the Flood Zone but is included within the masterplan proposals due to the connected public open space along the Roman River corridor it would provide as part of the wider development.

**A.127** Flood and natural/historic environment related constraints should not therefore be presented as reasons to discount development on the Site. On the contrary, Planning Practice Guidance provides clarity on the need for and role of a SA in relation to Plan development. It states that the SA is an iterative process, with proposals being revised as the Local Plan emerges to take account of the appraisal findings. It therefore stands to reason that appraisal findings presented at the regulation 18 draft stage should be amended at a later stage of the emerging Local Plan process to take account of evidence of suitable mitigation that addresses any significant effects. The suite of evidence included with these representations, as summarised above, identifies that the issues identified in the SA in respect of site 10514 can be addressed with suitable mitigation. The SA should therefore be updated.

### Response

The SA scoring provides a consistent, proportionate comparison to help the Council decide which site options to take forward for allocation but it is not the deciding factor. The Council has also taken account of other evidence through the plan-making process.

The SA did not take into consideration technical assessments or supporting evidence submitted for individual site options. Such evidence can vary significantly in scope and availability and reliance on it by the SA could introduce inconsistency, and potentially bias, into the assessment process. It would also be disproportionate to the strategic nature of SA/SEA. However, any such technical work was reviewed separately by the Council to help inform the decisions on which sites to take forward for allocation.

A high-level, policy-off appraisal was undertaken for all reasonable alternative site options, without taking into account policy mitigation. This approach ensures consistency and transparency by applying the same, mainly proximity-based assessment criteria to each site option and is

proportionate in light of the strategic nature of SA/SEA of development plans and the large number of site options requiring assessment. Following this, a policy-on appraisal of allocated sites also considered the mitigation and requirements set out within the relevant Place Policies. Any details that relate to the design of the site can only be considered by the SA if they are contained within a site allocation policy. Therefore, considering masterplanning and site design is outwith the scope of the SA.

This response relates only to matters within the scope of the SA. When assessing site options, a distance-based approach was used to consider potential impacts on biodiversity and historic environment, drawing on proximity to designated sites and heritage assets. Therefore, the distance of the site from Marks Tey Brickpit SSSI has resulted in a negative score. The site is also located in close proximity to Circular brick kilns, W H Collier Brick and Tile Works, Church Lane Schedule Monument.

Similarly, flood risk was appraised based on mapped flood risk datasets. A small part of the northern edge of the site falls within Flood Zone 3 and there are also areas of surface water flooding.

## JLL

**A.128** DIO Berechurch is located in South Colchester, bound by Berechurch Hall Road to the north and the MCTC (Military Corrective Training Centre) to the west. The SA identifies several key risks and issues associated with the proposed housing allocations. While the following are considered and scored, there are significant risks which have not been fully considered and addressed through the SA and the Local Plan itself. These are as follows:

**A.129** The spatial strategy (Policy ST3) directs much of the development required to the urban area and the larger settlements that sit directly below this

in the settlement hierarchy and supports the re-use of previously developed land. However, this is not correct and significant amounts of development are also directed to greenfield sites in village locations that comprise best and most versatile agricultural land, particularly to the north and west of the main urban area. It is notable that the Tendring Colchester Borders Garden Community comprises a large greenfield site that takes in areas of Grade 1 and Grade 2 agricultural soils. This is also particularly the case on settlement edges and strategic growth locations such as Marks Tey, Tiptree, and Langham. This represents a substantial adverse impact, for which full mitigation may not be possible given the scale of development required and is directly referenced in the SA report. The plan does not identify a robust mitigation strategy for the full loss of this land; instead, it suggests directing the lowest levels of growth to the highest sensitivity areas but concedes this cannot wholly avoid the impact due to development requirements.

**A.130** Colchester is classified as ‘seriously water stressed’ and projected housing growth will increase overall water demand and wastewater generation. Some allocations are within water protection zones, raising pollution risks. The capacity of water resources and wastewater infrastructure is not conclusively established; flood risk persists at some sites, notably in the Hythe area and parts of Mersea and Marks Tey.

**A.131** The scale and distribution of planned housing places significant pressure on educational, health, transport, and community infrastructure. Larger new sites require substantial supporting investment to avoid congestion and capacity issues with key services. The SA concedes there are “uncertainties to effectiveness of delivery”, especially for large, infrastructure-dependent allocations. In some cases, infrastructure phasing, funding, or detailed solutions remain to be worked up, with the risk placed on future masterplanning

**A.132** Edge-of-settlement and strategic allocations may adversely affect rural landscape character, visual amenity, and the distinctiveness of settlements. Areas such as Dedham Vale National Landscape (AONB), Dedham, Mersea, Langham, and Marks Tey are identified as particularly sensitive. The Plan includes landscape and green infrastructure policies, requirements for masterplanning and screening, and the intention to focus growth in less

sensitive settlements. However, the SA admits that “full mitigation may not be possible given the scale of development required,” and some area-specific policies still score adversely or as uncertain in the Appraisal, particularly in relation to Dedham Vale and the rural/urban fringe

**A.133** Delivery risk is highlighted for large-scale and complex sites (e.g., Garden Communities), particularly in relation to infrastructure dependency, lead-in times, and effective phasing. Ensuring a continuous and sustainable housing trajectory will require robust masterplanning and coordination.

**A.134** The SA identifies a number of negative effects have largely been identified in relation to the substantial land take required to support the level of development over the plan period and the location of development in relation to sensitive environmental receptors. Furthermore, much of the development beyond the urban area will be on greenfield land. This includes the development of the large-scale development at the Tendring Colchester Garden Community as well as further large-scale sites at Marks Tey, Tiptree, and Langham. Furthermore, the District contains large areas of Grade 2 and Grade 3 agricultural soils and many of the sites proposed for allocation lie within these areas.

**A.135** Our client objects to the SA as currently drafted. The SA underscores substantial challenges, particularly regarding environmental impacts, infrastructure capacity, landscape protection, and the potential for localised adverse effects. Addressing these risks will require ongoing evidence gathering, site-specific safeguards, professional masterplanning, and proactive infrastructure investment which all come with significant uncertainties. The SA therefore acknowledges significant risks to the Plan's deliverability and recognises uncertainties regarding the effectiveness of reliance on the strategic allocations as currently drafted. It also highlights negative scores or uncertainties for landscape, biodiversity, water management, and public transport for some sites. The Local Plan should be updated to respond directly to the risks and issues identified in the SA. This includes developing more robust safeguards for environmental protection, infrastructure capacity, and landscape sensitivity for all proposed housing allocations.

## Response

It is expected that some greenfield land will need to be developed to support the level of growth required across Colchester. However, directing the majority of growth to the urban area will mean that, where possible, previously developed land can be utilised. Some level of growth is also expected at villages to ensure an appropriate level of growth is supported across Colchester and to help sustain these settlements. The SA identified negative effects on SA Objective 2: Efficient use of Land in relation to Policy ST3 due to the substantial development of greenfield land and the large scale development at the Tendring Colchester Borders Garden Community. The SA also identified negative effects against a number of environmental SA objectives. Any mitigation as a result of development will likely come through the individual site allocation policies.

A Water Cycle Study is being prepared to accompany the Local Plan, which will assess the level of development planned for across Colchester with regard to water supply capacity, sewage capacity and any water quality issues or infrastructure upgrades that may be required, to identify any potential constraints to the water cycle which development may pose. This evidence will inform the plan and the SA at the next stage of plan-making.

It is acknowledged that large developments may place a strain on existing infrastructure. Such capacity issues are being identified through the separate Infrastructure Delivery Plan (IDP) process. Any infrastructure requirements will be set out through the site allocation policy. In addition, infrastructure phasing, development site phasing and funding will be dealt with through planning conditions and any legal agreements as part of the planning application.

In relation to site options, the SA largely uses a distance-based approach to appraise sites. The SA can appraise the wording of Local Plan policies and where potential negative effects are identified, the SA will make recommendations to strengthen policy wording and enhance proposed mitigation. Much of the detailed, site-specific mitigation for individual sites will be developed through the masterplanning process and then secured through the planning application process. The SA takes into consideration the evidence base that is available at the time of undertaking the appraisal. Final decisions on which sites are allocated lies with the Council but the findings of the SA of the site options have been taken into consideration.

When considering which site options to allocate, the deliverability of the site has also been considered by the Council but this is outside of the scope of the SA.

## Appendix B

# Review of Plans, Policies and Programmes

## International plans and programmes of most relevance for the Local Plan

**B.1** 2022 Convention on Biological Diversity [\[See reference 1\]](#) – COP15 Kunming-Montreal adopted the “Kunming-Montreal Global Biodiversity Framework” (GBF), including four goals and 23 targets for achievement by 2030.

**B.2** The Glasgow Pact (UN Framework Convention on Climate Change, 2021) - Nations adopted the Glasgow Climate Pact [\[See reference 2\]](#). The package of decisions consists of a range of agreed items, including strengthened efforts to build resilience to climate change, to curb greenhouse gas emissions and to provide the necessary finance for both. Nations reaffirmed their duty to fulfil the pledge of providing \$100 billion annually from developed to developing countries. They collectively agreed to work to reduce the gap between existing emission reduction plans and what is required to reduce emissions. They also agreed to phase down unabated coal power and inefficient subsidies for fossil fuels.

**B.3** United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021) [\[See reference 3\]](#) - An international commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

**B.4** The 2030 Agenda for Sustainable Development (2015) [\[See reference 4\]](#), adopted by all United Nations Member States, provides a shared blueprint for

peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all.

**B.5** The United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998) [\[See reference 5\]](#) establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

**B.6** The United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002) [\[See reference 6\]](#) - Sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

**B.7** The United Nations Paris Climate Change Agreement (2015) [\[See reference 7\]](#) is an international agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

**B.8** The International Convention on Wetlands (Ramsar Convention) (1976) [\[See reference 8\]](#) is an international agreement with the aim of conserving and managing the use of wetlands and their resources.

**B.9** The European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979) [\[See reference 9\]](#) aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

**B.10** The International Convention on Biological Diversity (1992) [\[See reference 10\]](#) is an international commitment to biodiversity conservation through national strategies and action plans.

**B.11** The European Habitats Directive (1992) [\[See reference 11\]](#), together with the Birds Directive, sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

**B.12** The European Birds Directive (2009) [\[See reference 12\]](#) requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

**B.13** The United Nations Declaration on Forests (New York Declaration) (2014) [\[See reference 13\]](#) sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

**B.14** The Valletta Treaty (1992) [\[See reference 14\]](#), formerly the European Convention on the Protection of the Archaeological Heritage (Revisited), aims to protect the European archaeological heritage “as a source of European collective memory and as an instrument for historical and scientific study”.

**B.15** The United Nations (UNESCO) World Heritage Convention (1972) [\[See reference 15\]](#) promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

**B.16** The European Convention for the Protection of the Architectural Heritage of Europe (1985) [\[See reference 16\]](#) defines ‘architectural heritage’ and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be

integrated into planning systems and other spheres of government influence as per the text of the convention.

**B.17** The European Landscape Convention (2002) [\[See reference 17\]](#) promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

## National Plans and Programmes (beyond the NPPF) of most relevance for the Local Plan

### Climate Change Adaptation and Mitigation

**B.18** Warm homes plan (2026) [\[See reference 18\]](#) sets out how we will help people find ways to save money on energy bills and transform our ageing building stock into comfortable, low-carbon homes that are fit for the future.

**B.19** A Well-Adapted UK: The Fourth Independent Assessment of UK Climate Risk (CCRA4-IA) (2026) [\[See reference 19\]](#) sets out climate risks, actions, and enablers across 14 key systems including health, land, and the economy. This includes targets in 2050 for excess heat-related mortality to be no greater, and ideally lower, than today's annual average.

**B.20** Clean Energy Industries Sector Plan (2025) [\[See reference 20\]](#) is the UK government's strategic initiative, under the Modern Industrial Strategy, to position the nation as a global leader in frontier clean energy technologies by 2035. The plan sets out an ambition to double investment across key clean energy industries, such as wind (onshore, offshore, floating), nuclear fission, fusion, hydrogen, carbon capture, usage and storage (CCUS), greenhouse gas removals, and heat pumps, to over £30 billion per year, while continuing to

support other vital technologies like solar, long-duration energy storage and bioenergy. It aims to catalyse private sector engagement by deploying targeted public investment, including more than £8.3 billion through Great British Energy and Great British Energy-Nuclear up to 2029 and a Clean Energy Supply Chain Fund, and by reducing barriers to investment, thereby providing industry certainty and encouraging deployment and innovation.

**B.21** Hydrogen Update to the Market (2025) [\[See reference 21\]](#) provides a detailed overview of the UK's hydrogen policy progress UK's and outlines forthcoming opportunities as part of the government's Clean Energy Superpower and Growth Missions. Significant investment commitments include over £500 million allocated toward developing the first regional hydrogen transport and storage network, aiming for operation by 2031, supported by a forthcoming Hydrogen to Power Business Model in 2026.

**B.22** Onshore Wind Strategy (2025) [\[See reference 22\]](#) presents the country's first dedicated strategy to accelerate onshore wind deployment as a key component of its Clean Power 2030 mission. The strategy sets a target of deploying 27-29 GW of onshore wind capacity across Great Britain by 2030, significantly increasing from existing capacity of over 16 GW, and backed by over 40 actions to tackle barriers such as planning delays, aviation and defence conflicts, grid access, and community engagement.

**B.23** Carbon Budget and Growth Delivery Plan (2025) [\[See reference 23\]](#) sets out how the government will meet its statutory carbon budgets and secure the benefits of this transition for people and businesses. The plan sets out a package of quantified and unquantified proposals and policies and associated timescales and delivery risks. This includes actions around energy security and lower bills, such as incentivising new clean electricity generating projects in Great Britain.

**B.24** Environmental Improvement Plan (2025) [\[See reference 24\]](#) is a long-term delivery plan setting out 10 goals, commitments and actions in relation to the natural environment. The plan sets out how the government will work with landowners, communities and businesses to deliver each goal for improving the

environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of the country. The overarching goal of the plan is achieving “restored nature”, including progress towards the commitment to protect 30% of UK land and sea for nature by 2030, alongside improving the condition and resilience of nature assets.

**B.25** Clean Power 2030 Action Plan: A New Era of Clean Electricity (2024) [\[See reference 25\]](#) sets out a pathway to a clean power system by 2030, outlining what the Government will do to support and accelerate delivery of the new infrastructure. It seeks to address the following challenges:

- To maintain a secure and affordable energy supply in an increasingly unstable world.
- To create new industries and investments around the country.
- To protect the environment, we live in from the most damaging effects of climate change.

**B.26** Energy Security Plan (2023) [\[See reference 26\]](#) sets out the steps that the government is taking to improve the UK’s energy system resilience, particularly in the current geopolitical context. Key commitments include

- Looking at the role gas storage and other sources of flexibility can play in gas security.
- Delivery of energy efficiency upgrades through the Great British Insulation Scheme.
- Extension of the Boiler Upgrade Scheme to 2028.

**B.27** Net Zero Growth Plan (2023) [\[See reference 27\]](#) outlines the Government’s plans to reach net zero and unlock the financial benefits that this can bring. Key commitments include:

- Responding to the consultation on a revised Waste Prevention Programme for England alongside the new programme ‘Maximising Resources, Minimising Waste’.

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- Providing up to £20 billion of funding for early deployment of CCUS to unlock private investment and jobs.
- Consulting on an ambitious Zero Emission Vehicle mandate; publishing the Low Carbon Fuels Strategy in 2023; and legislating to include recycled carbon and nuclear derived fuels in renewables transport fuel schemes.
- National Adaptation Programme and the Fourth Strategy for Climate Adaptation Reporting (2023) [See reference 28] sets out a series of actions for the following sectors over a 5-year period: Infrastructure - new commitments on resilience standards, investment in water quality and a new transport adaptation strategy
- Nature environment - Local Nature Recovery Strategies, incorporate climate change adaptation into the design of Environmental Land Management schemes and Nature Recovery Projects
- Health, communities and the built environment - investment in flood and coastal erosion schemes, Adverse Weather & Health Plan, update the National Planning Infrastructure - new commitments on resilience standards, investment in water quality and a new transport adaptation strategy
- Nature environment - Local Nature Recovery Strategies, incorporate climate change adaptation into the design of Environmental Land Management schemes and Nature Recovery Projects
- Health, communities and the built environment - investment in flood and coastal erosion schemes, Adverse Weather & Health Plan, update the National Planning

**B.28** The waste prevention programme for England: Maximising Resources, Minimising Waste (2023) [See reference 29] Sets out government's priorities for managing resources and waste, in line with the resources and waste strategy for England.

**B.29** National Flood and Coastal Erosion Risk Management Strategy for England (2022) [See reference 30] Sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk

management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are:

- climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the future in the face of climate change;
- today's growth and infrastructure resilient in tomorrow's climate: making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as infrastructure resilient to flooding and coastal change; and
- a nation ready to respond and adapt to flooding and coastal change: ensuring local people understand their risk to flooding and coastal change and know their responsibilities and how to act.

**B.30** The Industrial Decarbonisation Strategy (2021) [\[See reference 31\]](#) aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy sets out the government's vision for building a competitive, greener future for the manufacturing and construction sector and is part of the government's path to net zero by 2050. The strategy aims to reduce emissions by two-thirds in just 15 years and support up to 80,000 jobs over the next thirty years and includes measures to produce 20 terawatt hours of the UK industry's energy supply from low carbon alternatives by 2030. It also aims to introduce new rules on measuring the energy and carbon performance of the UK's largest commercial and industrial buildings, providing potential savings to businesses of around £2 billion per year in energy costs in 2030 and aiming to reduce annual carbon emissions by over 2 million tonnes - approximately 10% of their current emissions. Other key commitments within the Strategy include:

- The use of carbon pricing to drive changes in industry to focus on emissions in business and investment decisions.
- To establish a policy framework to accelerate the switch from fossil fuels to low carbon alternatives such as hydrogen, electricity, or biomass.

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- New product standards, enabling manufacturers to clearly distinguish their products from high carbon competitors.
- To ensure the land planning regime is fit for building low carbon infrastructure.
- Support the skills transition so that the UK workforce benefits from the creation of new green jobs.
- An expectation that at least 3 megatons of CO<sub>2</sub> is captured within industry per year by 2030.
- That by 2050, there will be zero avoidable waste of materials across heavy industries.

**B.31** The Heat and Buildings Strategy (2021) [\[See reference 32\]](#) sets out the government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050. Key aims of the strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial, and industrial buildings by 2030.
- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.
- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.
- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.

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- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.
- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning- Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

**B.32** The UK Hydrogen Strategy (2021) [\[See reference 33\]](#) sets out the approach to developing a substantial low carbon hydrogen sector in the UK and to meet the ambition for 5GW of low carbon hydrogen production capacity by 2030. The Strategy outlines the role of hydrogen in meeting net zero targets, the existing opportunity within the UK, a strategic framework, a roadmap for the economy, and the UK Government's commitments for a hydrogen economy. The Energy Performance of Buildings Regulations (2021).

**B.33** The Energy Performance of Buildings Regulations (2021) [\[See reference 34\]](#) seek to improve the energy efficiency of buildings, reducing their carbon

emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

**B.34** Waste Management Plan for England (2021) [\[See reference 35\]](#) sets out the measures for England to work towards a zero-waste economy.

**B.35** Flood and Coastal Erosion Risk Management: Policy Statement (2020) [\[See reference 36\]](#) sets out the government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, and in doing so, reduce the risk of harm to people, the environment and the economy. The Policy Statement sets out five policy areas which will drive this ambition. These are:

- Upgrading and expanding our national flood defences and infrastructure;
- Managing the flow of water more effectively;
- Harnessing the power of nature to reduce flood and coastal erosion risk and achieve multiple benefits;
- Better preparing our communities; and
- Enabling more resilient places through a catchment-based approach.

**B.36** The Waste (Circular Economy) (Amendment) Regulations 2020 [\[See reference 37\]](#) seek to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

**B.37** The Flood and Water Management Act 2010 [See reference 38] and The Flood and Water Regulations 2019 [See reference 39] sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

**B.38** Climate Change Act (2008) and Climate Change Act 2009 (2050 Target Amendment) Order (2019) [See reference 40] sets targets for UK greenhouse gas emission reductions of at least 100% by 2050, against a 1990 baseline (this was previously 80% but was updated to a net zero target in June 2019).

**B.39** Our Waste, Our Resources: A strategy for England (2018) [See reference 41] aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

**B.40** The Clean Growth Strategy (2017) [See reference 42] sets out the approach of the government to secure growth of the national income while cutting greenhouse gas emissions. The key policies and proposals of the Strategy sit below a number of overarching principles: acceleration of clean growth including through recommendations for private and public investment to meet carbon budgets; providing support to improve business and industry energy efficiency; improving energy efficiency in the housing stock including through low carbon heating; accelerating the shift to low carbon transport; delivering clean, smart, flexible power; enhancing the benefits and value of our natural resources; leading in the public sector to meet emissions targets; and ensure Government leadership to drive clean growth.

**B.41** The National Planning Policy for Waste (NPPW) (2014) [See reference 43] identifies key planning objectives, requiring planning Authorities to:

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- Help deliver sustainable development through driving waste management up the waste hierarchy;
- Ensure waste management is considered alongside other spatial planning concerns;
- Provide a framework in which communities take more responsibility for their own waste;
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment; and
- Ensure the design and layout of new development supports sustainable waste management.

**B.42** The Climate Change Act 2008 [See reference 44] sets targets for UK greenhouse gas emission reductions of at least 100% by 2050, against a 1990 baseline (this was previously 80% but was updated to a net zero target in June 2019).

**B.43** The Planning and Energy Act (2008) [See reference 45] enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

## Health and Well-being

**B.44** The Health Bill (2026) [See reference 46] was introduced to the House of Commons in May 2026 and seeks to improve patient care. The bill will:

- improve patient safety and experience through a new single patient record, enabling joined-up, proactive care and empowering patients
- put power and resources in the hands of frontline NHS organisations by abolishing NHS England and stripping back national bureaucracy

- clarify the role of local health bodies, giving them real flexibility to design and deliver health services to best meet the needs of their local populations.

**B.45** The Future Homes and Buildings Standards: Building Circular 01/2026 (2026) [See reference 47] sets out amendments to Building Regulations in England aimed at delivering highly energy-efficient, low-carbon new homes and buildings.

**B.46** Planning and Infrastructure Bill (2025) [See reference 48] sets out the Government's plan to support housing and economic growth. The Bill aims to speed up and streamline the delivery of new homes and critical infrastructure, supporting delivery of the government's Plan for Change milestones of building 1.5 million safe and decent homes in England and fast-tracking 150 planning decisions on major economic infrastructure projects by the end of the current Parliament. It will also support delivery of the government's Clean Power 2030 target by ensuring that key clean energy projects are built as quickly as possible.

**B.47** Renters' Rights Act (2025) [See reference 49] aims to improve renters' security and rights. The Act delivers the government's manifesto commitment to transform the experience of private renting, including by ending Section 21 'no fault' evictions. The Act will improve the current system for both the 11 million private renters and 2.3 million landlords in England. It will give renters much greater security and stability so they can stay in their homes for longer, build lives in their communities, and avoid the risk of homelessness.

**B.48** Healthy Homes — a foundation for healthier and resilient communities (2025) [See reference 50] sets out core specification and good practice guidance to help support the delivery of healthier living environments. The guidance also covers neurodiversity, and the adoption of an 'age-friendly' design approach that supports residents and households to live independently throughout the different stages of their life. Beyond individual wellbeing, Healthy Homes support sustainability and affordability, helping to lower energy costs and reduce carbon emissions.

**B.49** Planning Policy for Traveller Sites (2024) [\[See reference 51\]](#) sets out the Government's planning policy for traveller sites. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

**B.50** Plan for Change (2024) [\[See reference 52\]](#) sets out the Government's milestones for growing the economy as well as delivering an improved NHS, safer streets, opportunities for all, and infrastructure for clean energy.

**B.51** Policy Statement on New Towns (2024) [\[See reference 53\]](#) outlines a strategic vision to stimulate economic growth and enhance living standards by constructing 1.5 million new homes during the current parliamentary term. Central to this initiative is the development of large-scale communities, each comprising at least 10,000 homes, through both standalone new towns on greenfield sites and significant urban extensions or regeneration projects. These developments aim to address housing demand, alleviate constraints in existing urban areas, and align with national infrastructure plans.

**B.52** UK Health Security Agency (UKHSA) strategic plan 2023 to 2026 (2023) [\[See reference 54\]](#) outlines UKHSA's goals and strategic priorities for the 3-year period to protect the nation's health from current and future threats.

**B.53** Levelling Up and Regeneration Act (2023) [\[See reference 55\]](#) sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Act also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'.

**B.54** Homes England Strategic Plan 2023 to 2028 (2023) [\[See reference 56\]](#) sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

**B.55** Anti-Social Behaviour Action Plan (2023) [\[See reference 57\]](#) sets out a new approach to working with local agencies to tackle anti-social behaviour across England and Wales. The plan intends to change laws and systems to take a zero-tolerance approach and give the police and other agencies the tools they need to discourage anti-social behaviour.

**B.56** The Green Infrastructure Framework (2023) [\[See reference 58\]](#) by Natural England will help increase the amount of green cover to 40% in urban residential areas. The Green Infrastructure Framework provides a structure to analyse where greenspace in urban environments is needed most. It aims to support equitable access to greenspace across the country, with an overarching target for everyone being able to reach good quality greenspace in their local area. From parks to green roofs, and increased tree cover, the Green Infrastructure Framework will make a significant contribution to nature recovery by embedding nature into new developments. Increasing the extent and connectivity of nature-rich habitats will also help increase wildlife populations, build resilience to the impacts of climate change, and ensure our cities are habitable for the future

**B.57** Health and Care Act (2022) [\[See reference 59\]](#) aimed at making England's health and social care system less bureaucratic and more integrated, focusing on joined-up services through new bodies called Integrated Care Systems (ICSs). It dismantled some structures from the 2012 Act, removes competition rules, and gives the Health Secretary greater power, while also introducing new training mandates, such as for learning disability and autism awareness.

**B.58** The National Design Guide (2021) [\[See reference 60\]](#) sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

**B.59** Build Back Better: Our Plan for Health and Social Care (2021) [\[See reference 61\]](#) sets out the government's new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the

NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

**B.60** Using the planning system to promote healthy weight environments (2020), Addendum (2021) [\[See reference 62\]](#) provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

**B.61** The Charter for Social Housing Residents: Social Housing White Paper (2020) [\[See reference 63\]](#) sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

**B.62** The Environmental Noise Regulations 2006 (as amended 2018) [\[See reference 64\]](#) apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

**B.63** The Technical Housing Standards – Nationally Described Space Standard (2015) [\[See reference 65\]](#) sets out the Government’s new nationally described space standard. The standard deals with internal space within new dwellings and sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy, as well as floor areas and dimensions for key parts of the home.

## Environment (biodiversity/geodiversity, landscape and soils)

**B.64** Environmental Outcomes Reports: Roadmap to reform (2026) [\[See reference 66\]](#) sets out that the Government plans to replace Environmental Impact Assessments (EIA) and Strategic Environmental Assessments (SEA) with Environmental Outcomes Reports (EORs) by 2027, creating a simpler, outcomes-focused system that assesses how development contributes to environmental objectives rather than merely documenting impacts. The reforms aim to:

- allow communities to better understand the environmental effects of development
- give developers the certainty and clarity they need to embed environmental considerations from the outset
- provide decision-makers with the information they need to give the environment sufficient weight and support robust, informed decisions.

**B.65** Environmental Improvement Plan (2025) [\[See reference 67\]](#) is a long-term delivery plan setting out 10 goals, commitments and actions in relation to the natural environment. The plan sets out how the government will work with landowners, communities and businesses to deliver each goal for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of the country. The overarching goal of the plan is achieving “restored nature”, including progress towards the commitment to protect 30% of

UK land and sea for nature by 2030, alongside improving the condition and resilience of nature assets.

**B.66** Green Infrastructure Framework and associated 15 GI Principles (2023) [\[See reference 68\]](#). The ‘15 minute neighbourhood’ concept is encouraged as part of the new GI standards set out in the framework. Development should be designed to meet the 15 Green Infrastructure Principles. The GI Standards can be used to inform the quality, quantity and type of green infrastructure to be provided.

**B.67** Working with nature (2022) [\[See reference 69\]](#) discusses the importance of nature in providing ecosystem services and presents recent and historical trends in biodiversity. It outlines some of the main pressures affecting England’s habitats, wildlife and ecosystems: land use; climate change; pollution; invasive non-native species; and hydrological change.

**B.68** Establishing the Best Available Techniques for the UK (UK BAT) (2022) [\[See reference 70\]](#) sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

**B.69** The Environment Act 2021 [\[See reference 71\]](#) sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. Biodiversity elements in the Act include:

- Strengthened biodiversity duty. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development.

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- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity
- Local Nature Recovery Strategies to support a Nature Recovery Network.
- Duty upon Local Authorities to consult on street tree felling.
- Strengthen woodland protection enforcement measures.
- Conservation Covenants.
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation.
- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain, requires regulated businesses to report on their due diligence, introduces a due diligence enforcement system.

### B.70 The Conservation of Habitats and Species (Amendment) (EU Exit)

Regulations 2019 [\[See reference 72\]](#) protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

### B.71 Environmental Damage (Prevention and Remediation) Regulations 2015

[\[See reference 73\]](#) are wide-ranging government regulations that can potentially apply to many businesses. The regulations oblige those who create environmental damage, whether by water pollution, adversely affecting protected species or sites of special scientific interest (SSSIs), or by land pollution that causes risks to human health, to not only cease the damage, but also to implement a wide variety of remedial measures to restore affected areas.

**B.72** Defra Right of Way Circular (1/09) (2011) [\[See reference 74\]](#) gives advice to local authorities on recording, managing and maintaining, protecting and changing public rights of way.

**B.73** The Countryside and Rights of Way Act 2000 [\[See reference 75\]](#) is an Act of Parliament to make new provision for public access to the countryside.

**B.74** Safeguarding our Soils – A Strategy for England (2009) [\[See reference 76\]](#) sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention on tackling degradation threats, including better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and dealing with contaminated land.

**B.75** The Natural Environment and Rural Communities Act 2006 [\[See reference 77\]](#) places a duty on public bodies to conserve biodiversity.

**B.76** Wildlife and Countryside Act 1981 (as amended) [\[See reference 78\]](#) was enacted primarily to implement the Birds Directive and Bern Convention in Great Britain. The Act received royal assent on 30 October 1981 and was brought into force in incremental steps. It is supplemented by the Wildlife and Countryside (Service of Notices) Act 1985, which relates to notices served under the 1981 Act. The act contains four parts and 17 schedules, which cover:

- Part 1: Wildlife (includes protection of birds, animals and plants; and measures to prevent the establishment of non-native species which may be detrimental to native wildlife).
- Part 2: Nature conservation, the countryside and National Parks (including the designation of protected areas).
- Part 3: Public rights of way.
- Part 4: Miscellaneous provisions of the act.

**B.77** The National Parks and Access to the Countryside Act 1949 [\[See reference 79\]](#) is an Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities' powers for the establishment and maintenance of nature reserves; to make further provision for the recording, creation, maintenance and improvement of public paths and for securing access to open country.

## Historic Environment

**B.78** Historic England, Corporate Plan 2023-26 [\[See reference 80\]](#) provides a framework for Historic England's work as an organisation and helps maintain a collective approach to delivering on their long-term vision.

**B.79** The Heritage Statement 2017 [\[See reference 81\]](#) sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

**B.80** Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8 (2016) [\[See reference 82\]](#) sets out requirements for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

**B.81** The Planning (Listed Buildings and Conservation Areas) Act 1990 [\[See reference 83\]](#) is an Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

**B.82** The Ancient Monuments and Archaeological Areas Act 1979 [\[See reference 84\]](#) is a law passed by the UK government to protect the archaeological heritage of England and Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient

monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

**B.83** The Historic Buildings and Ancient Monuments Act 1953 [\[See reference 85\]](#) is an Act of Parliament that makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

## Water and Air

**B.84** The National Framework for Water Resources 2025: Water for Growth, Nature and a Resilient Future (2025) [\[See reference 86\]](#) Provides a strategic blueprint for managing England's long term water needs. It emphasises the twin imperatives of securing resilient water supplies to support housing, energy, food production, economic growth, and a thriving natural environment, while safeguarding ecosystems through sustainable abstraction and nature based solutions. The Framework projects significant pressures on water resources driven by climate change, population growth, and emerging industrial demands, forecasting a shortfall of up to 5 billion litres per day by 2055. It calls for integrated, multi sector planning across national, regional, and local levels, combining demand management (such as leakage reduction and efficiency improvements) with development of new infrastructure and environmental enhancements.

**B.85** Environmental Improvement Plan (2025) [\[See reference 87\]](#) long-term delivery plan setting out 10 goals, commitments and actions in relation to the natural environment. The plan sets out how the government will work with landowners, communities and businesses to deliver each goal for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of the country. The overarching goal of the plan is achieving “restored nature”, including progress towards the commitment to protect 30% of UK land and sea for nature by 2030, alongside improving the condition and resilience of nature assets.

**B.86** National Assessment of Flood and Coastal Erosion Risk in England (2025) ('NaFRA 2') [\[See reference 88\]](#) provides an assessment of flood and coastal risk in England. The assessment provides detailed maps and data for current and future risks from rivers, the sea, and surface water, incorporating climate change projections and confirms that approximately 6.3 million properties are in areas at risk of flooding from one or a combination of sources (rivers, the sea, and surface water). The total number of properties in areas at risk from surface water is around 4.6 million, representing a 43% increase compared with the previous assessment in 2018. NaFRA 2 also highlights significant increases in properties located in high-risk zones, especially for surface water flooding.

**B.87** Drought: how it is managed in England (2025) [\[See reference 89\]](#) details how drought affects England and how the Environment Agency works with government, water companies and others to manage the effects on people, business and the environment. It aims to ensure consistency in the way we co-ordinate drought management across England. It sets out:

- the impacts of drought in England
- who is involved in planning, managing and responding and how we work together
- the actions we and others take to effectively manage droughts
- how we report on drought and communicate with others
- our role in recovery and learning from drought events

**B.88** Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Water (2023) [\[See reference 90\]](#) sets out actions to transform the management of the water system, deliver cleaner water for nature and people, and secure a plentiful water supply. The plan also sets out measures to address sources of pollution, and boost water supplies through more investment, tighter regulation, and more effective enforcement.

**B.89** Air quality strategy for England (2023) [\[See reference 91\]](#) sets out local authorities' powers and responsibilities as well as the actions that Defra expects

local authorities to take in support of the governments long-term air quality goals, including new PM2.5 targets.

**B.90** Establishing the Best Available Techniques for the UK (UK BAT) (2022) [\[See reference 92\]](#) sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

**B.91** National Flood and Coastal Erosion Risk Management Strategy for England (2022) [\[See reference 93\]](#) Sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are:

- climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the future in the face of climate change;
- today's growth and infrastructure resilient in tomorrow's climate: making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as infrastructure resilient to flooding and coastal change; and
- a nation ready to respond and adapt to flooding and coastal change: ensuring local people understand their risk to flooding and coastal change and know their responsibilities and how to act.

**B.92** National Chalk Streams Strategy (2021) [\[See reference 94\]](#) was built around the “trinity of ecological health”: water quantity, water quality and habitat quality and included 30+ recommendations to Defra, the Environment Agency, Natural England, the water companies, NGOs and stakeholders.

**B.93** Managing Water Abstraction (2021) [\[See reference 95\]](#) is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

**B.94** The Environment Act 2021 [\[See reference 96\]](#) sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers:

- Resource efficiency, producer responsibility, and the management, enforcement and regulation of waste;
- Local air quality management frameworks and the recall of motor vehicles etc; and
- Plans and proposals for water resources, drainage and sewerage management, storm overflows, water quality and land drainage.

**B.95** Meeting our future water needs: a national framework for water resources (2020) [\[See reference 97\]](#) set the strategic direction for long term regional water resources planning. The framework is built on a shared vision to:

- leave the environment in a better state than we found it
- improve the nation's resilience to drought and minimise interruptions to all water users

**B.96** The Flood and Water Management Act 2010 [\[See reference 98\]](#) and The Flood and Water Regulations (2019) [\[See reference 99\]](#) sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

**B.97** The Clean Air Strategy 2019 [\[See reference 100\]](#) sets out the comprehensive action that is required from across all parts of Government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

**B.98** The Environment Agency's Approach for Groundwater Protection (2018) [\[See reference 101\]](#) contains position statements which provide information about the Environment Agency's approach to managing and protecting groundwater. They detail how the Environment Agency delivers government policy for groundwater and adopts a risk-based approach where legislation allows. Many of the approaches set out in the position statements are not statutory but may be included in, or referenced by, statutory guidance and legislation.

**B.99** The Environmental Noise Regulations 2006 (as amended 2018) [\[See reference 102\]](#) apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

**B.100** The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 [\[See reference 103\]](#) protect inland surface waters, transitional waters, coastal waters and groundwater, and outlines the associated river basin management process. These Regulations establish the need to prevent deterioration of waterbodies and to protect, enhance and

restore waterbodies with the aim of achieving good ecological and chemical status.

**B.101** The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations 2017 [\[See reference 104\]](#) sets out the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles, a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help Local Authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

**B.102** The Environmental Permitting Regulations 2016 [\[See reference 105\]](#) streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment. They set out how to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment and human health.

**B.103** The Nitrate Pollution Prevention Regulations 2016 [\[See reference 106\]](#) provides for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The Regulations also specify the amount of nitrogen to be spread on a crop and how, where and when to spread nitrogen fertiliser, and how it should be stored. It also establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

**B.104** The Air Quality Standards Regulations 2016 [\[See reference 107\]](#) set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO<sub>2</sub>). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

**B.105** The Water Supply (Water Quality) Regulations 2016 [\[See reference 108\]](#) focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

**B.106** Groundwater (England and Wales) Regulations 2009 [\[See reference 109\]](#) implement in England and Wales Community legislation on pollution of groundwater. They provide rules for the granting by the Environment Agency of a permit under these Regulations, consent under section 91(8) of the Water Resources Act 1991 and (with exceptions) an environmental permit under the Environmental Permitting (England and Wales) Regulations. In addition, the Regulations create an offence of discharge of a hazardous substance or non-hazardous pollutant without a permit, provide for powers of enforcement of the Environment Agency and prescribe penalties for offences committed under these Regulations.

**B.107** The Environmental Noise Regulations 2006 [\[See reference 110\]](#) apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

**B.108** The Urban Waste Water Treatment Regulations (2003) [\[See reference 111\]](#) protect the environment from the adverse effects of urban waste water discharges and certain industrial sectors, notably domestic and industrial waste water. The regulations require the collection of waste water and specifies how different types of waste water should be treated, disposed and reused.

**B.109** The Environmental Protection Act 1990 [\[See reference 112\]](#) makes provision for the improved control of pollution to the air, water and land by regulating the management of waste and the control of emissions. Seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

## Economic Growth

**B.110** Planning and Infrastructure Bill (2025) [\[See reference 113\]](#) sets out the Government's plan to support housing and economic growth. The Bill aims to speed up and streamline the delivery of new homes and critical infrastructure, supporting delivery of the government's Plan for Change milestones of building 1.5 million safe and decent homes in England and fast-tracking 150 planning decisions on major economic infrastructure projects by the end of the current Parliament. It will also support delivery of the government's Clean Power 2030 target by ensuring that key clean energy projects are built as quickly as possible.

**B.111** UK Infrastructure: A 10 Year Strategy (2025) [\[See reference 114\]](#) sets out an integrated plan to transform economic, housing and social infrastructure over the next decade. It commits to at least £725 billion in public investment, supplemented by private financing via carefully targeted public-private partnership models and a new National Wealth Fund. The strategy introduces multiyear capital budgets (initially five-year, reviewed biennially) and establishes the National Infrastructure and Service Transformation Authority (NISTA) to unify planning, improve project delivery, assure major schemes, and coordinate a transparent Infrastructure Pipeline launched in July 2025.

**B.112** The UK's Modern Industrial Strategy (2025) [\[See reference 115\]](#) outlines a 10-year plan to boost business investment and elevate the UK's performance in eight designated growth driving sectors: advanced manufacturing; clean energy industries; creative industries; defence; digital and technologies; financial services; life sciences; and professional & business services.

**B.113** UK Infrastructure Pipeline (2025) [\[See reference 116\]](#) provides industry and investors with up-to-date information on public and privately delivered infrastructure projects in construction, under development or in pre-project stages where a clear strategic need has been prioritised by the UK Government or in business plans.

**B.114** The Plan for Change (2024) [\[See reference 117\]](#) outlines the UK Government's framework for long-term policy delivery across five priority areas: economic growth, healthcare, public safety, opportunity, and clean energy. It sets out specific targets within this Parliament, underpinned by aims to ensure economic stability, reform public services, and implement a more mission-focused approach to governance.

**B.115** Invest 2035: the UK's modern industrial strategy (2024) [\[See reference 118\]](#) is the UK Government's credible, 10-year plan to deliver the certainty and stability businesses need to invest in the high growth sectors. The Strategy will focus on tackling barriers to growth, creating the right conditions for increased investment, high-quality jobs and ensuring tangible impact in communities across the UK.

**B.116** The Agricultural Transition Plan 2021 to 2024 [\[See reference 119\]](#) aims to drive competitiveness, increase productivity, reduce carbon emissions, and generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g., grants will be available for sustainable farming practices, creating habitats for nature recovery and making landscape-scale changes such as establishing new woodland and other ecosystem services).

**B.117** Levelling Up and Regeneration Act (2023) [\[See reference 120\]](#) sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The

Act also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as ‘Environmental Outcomes Reports’.

**B.118** The Agriculture Act 2020 [See reference 121] sets out how farmers and land managers in England will be rewarded in the future with public money for “public goods” – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace. Agricultural Transition Plan 2021 to 2024.

**B.119** The LEP Network Response to the Industrial Strategy Green Paper Consultation (2017) [See reference 122] seeks to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government’s strategy. Consultation responses set out how the 38 Local Enterprise Partnerships will work with Government using existing and additional resources to develop and implement a long-term Industrial Strategy.

## Transport

**B.120** Better Connected: A Strategy for Integrated Transport (2026) [See reference 123] sets out UK government’s vision for domestic transport in England under eight priorities. The following objectives are of particular relevance to spatial planning:

- Transport will help create healthier communities, where making healthy travel choices will be easy and convenient, supporting cleaner, quieter and more liveable places.
- Pavements and cycle paths must be planned, maintained, and managed with the same priority as road infrastructure.
- In urban areas: Spatial planning should consider proximity to public transport links and building at high and ambitious densities to support its

use, creating developments where people do not need to rely on private cars to access shops, jobs and education opportunities.

- In suburban area: Spatial planning should consider proximity to public transport links and building at higher densities to support public transport viability, considering proximity to shops, services and other facilities to encourage walking, wheeling and cycling for shorter trips.
- In rural areas: Spatial planning should consider how to minimise transport-related social exclusion and ensure that solutions align with local housing, environmental priorities and the Land Use Framework.

**B.121** Future of Transport: supporting rural transport innovation (2023) [See reference 124](#)] shows how innovative and emerging transport technologies could address some of the major challenges in rural communities. It highlights the importance of transport to everyday life rural life and provides guiding carbonising Transport: Setting the Challenge principles for the introduction of new technologies and services.

**B.122** National Highways Environmental Sustainability Strategy (2023) [\[See reference 125\]](#) sets out National Highways' vision for the organisation in terms of the role it can play in national prosperity and helping to protect and enhance the environment. It sets out that the organisation will deliver net zero corporate emissions by 2030, maintenance and construction emissions by 2040 and road user emissions by 2050.

**B.123** The second cycling and walking investment strategy (CWIS2) (2023) [\[See reference 126\]](#) Sets out the government's ambition for walking and cycling in England. The strategy sets out four objectives to 2025:

- increase the percentage of short journeys in towns and cities that are walked or cycled from 41% in 2018 to 2019 to 46% in 2025.
- increase walking activity, where walking activity is measured as the total number of walking stages per person per year, to 365 stages per person per year in 2025.

- double cycling, where cycling activity is measured as the estimated total number of cycling stages made each year, from 0.8 billion stages in 2013 to 1.6 billion stages in 2025.
- increase the percentage of children aged 5 to 10 who usually walk to school from 49% in 2014 to 55% in 2025.

**B.124** The Cycling and Walking Investment Strategy Report to Parliament (2022) [See reference 127] sets out the objectives and financial resources for cycling and walking infrastructure. It states the Government's long-term ambition is to make walking and cycling the natural choices for shorter journeys. It aims to double cycling by 2025, increase walking activity, increase the percentage of children that usually walk to school and reduce the number of cyclists killed or seriously injured on England's roads.

**B.125** Future of freight plan (2022) [See reference 128] the vision of the plan is to create a freight and logistics sector that is cost-efficient, reliable resilient, environmentally sustainable and valued by society. It identifies the main challenges, objectives and actions that need to be taken in the following 5 priority areas:

- National Freight Network (NFN)
- Enabling the transition to net zero
- Planning
- People and skills

**B.126** Decarbonising Transport: A Better, Greener Britain (2021) (Decarbonising Transport Plan (DTP)) [See reference 129] sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The DTP commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035. The DTP also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero

rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

**B.127** Decarbonising Transport: Setting the Challenge (2020) [\[See reference 130\]](#) sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting the country on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

## Regional Plans and programmes of most relevance for the Local Plan

**B.128** Essex Joint Health and Wellbeing strategy 2026 to 2029 (2026) [\[See reference 131\]](#) sets out how Essex County Council and partners will work together to improve health and wellbeing for all Essex residents. The vision is to enable all residents to achieve good health in safe and thriving communities, with access to support when they need it. The strategy focuses on:

- improving life chances for children and young people
- helping more people get jobs and stay in work
- building healthy, resilient and connected communities
- creating opportunities to improve health and reduce the impact of poor health

**B.129** Essex Air Quality Strategy (2025) [\[See reference 132\]](#): The Strategy brings together the 15 councils across Essex to work together to improve air

quality. The strategy aims to improve air quality for our health and to manage any factors that can negatively affect air quality. The strategy is accompanied by an Action Plan which sets out a number of actions to improve air quality.

**B.130** Essex Local Nature Recovery Strategy (LNRS) (2025) [\[See reference 133\]](#) seeks to find locations for the creation of habitat. It aims to identify the locations most likely to provide the greatest benefit for nature and the wider environment. The Essex LNRSs a tool designed to drive nature recovery action and bring about benefits for nature and the wider environment. The improvement, enhancement, and creation of habitats can deliver multiple benefits.

**B.131** Minerals Local Plan review 2025 to 2040 (draft) (2025) [\[See reference 134\]](#) provides an update to the current Essex Minerals Local Plan, which was adopted in July 2014. This Review acts to extend the current Plan period from 2029 to 2040. As part of this update, new mineral annual provision rates have been calculated. New sites will be needed to meet the forecasted demand for minerals. The future plan will ensure that forecasted growth and development demands can be supported Essex.

**B.132** Essex Climate Action Plan (2021–2028) (2025) [\[See reference 135\]](#) provides the third action plan to be published by Essex County Council, covering the period 2025/26 through to 2027/28. It is the strategic framework for reducing greenhouse gas emissions and building climate resilience across the county.

**B.133** The emerging Essex Local Transport Plan (2025) [\[See reference 136\]](#), titled "A Better Connected Essex," outlines a long-term vision to shift away from car reliance toward sustainable travel, decarbonize the network by 2050, and support housing growth.

**B.134** Water Strategy for Essex (2024) [\[See reference 137\]](#) aims to address the county's significant water challenges. It outlines 30 key recommendations to safeguard Essex's water future. These include reducing water consumption through efficient appliances and public awareness campaigns, changing land

use to increase natural green infrastructure, and developing new water sources like reservoirs and desalination.

**B.135** Essex Healthy Weight Strategy 2024 [\[See reference 138\]](#) outlines how the County will support Essex residents to achieve and maintain a healthy weight, including by creating an environment and culture where making a healthy choice is the easy choice.

**B.136** Waste Strategy for Essex 2024–2054 is a 30-year environmental framework developed by the Essex Waste Partnership (EWP) [\[See reference 139\]](#). The partnership is made up of the 12 district, borough and city councils in Essex. The strategy commits the partnership to work together to minimise the impact that waste has on the environment, particularly through embracing the circular economy.

**B.137** Essex Housing strategy 2021 to 2025 (2023) [\[See reference 140\]](#) sets out why housing is important to Essex County Council. The strategy sets out three strategic goals:

- Growing Essex while protecting the best of the county
- Enabling people to live independently throughout their life
- Supporting people facing homelessness or rough sleeping.

**B.138** These goals will only be realised by working in partnership across the housing system. For each strategic goal we have identified outcomes that ECC will work to achieve with our partners

**B.139** Meaningful Lives Matter: Our plan for a more inclusive Essex (2023) [\[See reference 141\]](#) seeks to enhance the lives of people with disabilities over the next four years. The plan focuses on four key aspirations: fostering meaningful relationships within the community, ensuring suitable living accommodations, promoting health and wellbeing, and providing access to fulfilling daily activities such as education, employment, and volunteering.

**B.140** Essex County Council Tree Management Plan (2023) [\[See reference 142\]](#) focuses on managing, improving, and extending the council's tree stock. It outlines objectives for tree planting, including increasing species diversity and retrofitting urban spaces with green infrastructure.

**B.141** Levelling up Essex (2022) [\[See reference 143\]](#) sets out how people living in priority areas of the county will be supported to benefit from the same opportunities and life chances as the wider Essex population. The Levelling Up Essex – A Thriving Essex: year three impact report, published in 2025, stipulates that over the past three years, Levelling Up Essex has delivered against our aims of ensuring:

- more children receive the support they need to learn and succeed at key stages of their development and ensure more low-income families have access to good quality, free or affordable childcare to widen access to employment
- it is easier than ever before for residents to be able to retrain and gain new skills and offer targeted support and advice for young people not in employment, education or training
- that we have created the conditions for more local jobs and opportunities for Essex residents by working alongside our public and private sector partners
- we have strengthened our communities by investing in community hubs and community supermarkets in the places that will benefit the most

**B.142** Transport East Active Travel Strategy (2021) [\[See reference 144\]](#): The vision for the region is that half of all journeys within towns and cities (up to three miles from the urban centre) will be made by walking and cycling. By 2050, half of all trips in the Transport East region will be made by walking or cycling. In Thurrock, a “Go Dutch” scenario (which applies Dutch rates for cycle commuting in England adjusting for distance and hilliness) would result in almost a twelve-fold increase of the population who could commute to work by cycle, to 24.9%.

**B.143** Everyone's Essex: Our Plan for Levelling Up the County 2021-2025 (2021) [\[See reference 145\]](#) sets out 20 commitments which seek to enhance the quality of life for all people in Essex. It focuses on four areas; the economy, the environment, children and families and promoting health, care and wellbeing for all ages.

**B.144** Thames Estuary Hydrogen Investment Routemap (2021) [\[See reference 146\]](#) aims for the Thames Estuary, including the section within Thurrock, to become a “hydrogen ecosystem”, highlighting that the Estuary is uniquely placed to support and realise the governments hydrogen ambitions.

**B.145** South East Inshore Marine Plan (2021) [\[See reference 147\]](#) introduces a strategic approach to planning within the inshore waters between Suffolk and Kent, including the Thames Estuary. This includes building resilience and adaptations to climate change, as well as consideration of renewable energy and potential for carbon capture and storage.

**B.146** South Essex Green and Blue Infrastructure Strategy: Resilient by Nature (2020) [\[See reference 148\]](#) sets out a vision for and integrated green and blue infrastructure (GBI) network across South Essex and sets out key objectives and projects to achieve this. This includes improving connectivity within and across the landscape through active travel links such as walking and cycling.

**B.147** Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) 2026 [\[See reference 149\]](#) aims to deliver the mitigation necessary to avoid significant adverse effects from ‘in-combination’ impacts of residential development that is anticipated across Essex; thus protecting the European sites on the Essex coast, including the Thames Estuary and Marshes Ramsar site and Special Protection Area, from adverse effects on site integrity. This includes a detailed programme of strategic mitigation measures which are to be funded by developer contributions from all new residential developments within the zone of influence.

**B.148** Green Essex Strategy (2019) [\[See reference 150\]](#) seeks to enhance, protect and create an inclusive and integrated network of high-quality green

infrastructure in Greater Essex, to create a county-wide understanding of green infrastructure – its functions and values, and to identify opportunities for implementing green infrastructure. The Strategy promotes the use of the green infrastructure network for sustainable and active modes of transport such as walking and cycling.

**B.149** Essex Local Flood Risk Management Strategy (2018) [\[See reference 151\]](#) sets out the aims and actions to reduce the impact of local flooding across Essex, with nine key objectives to help reduce flooding:

- To provide a clear explanation of everyone's responsibilities.
- To make sure people understand their risk of flooding and think about how we communicate this.
- To explain how we assess flood risk in Essex and then prioritise the work we do.
- To clearly set out our work so that communities and businesses can make decisions about how they also manage flood risk.
- To ensure that planning decisions properly consider flooding and the future impact of any development.
- To state how we share information and work with other authorities.
- To ensure that emergency plans and responses to flood incidents are effective and that communities are prepared for flooding.
- To encourage innovative new thinking, considering community needs, while working with the existing natural and built environment.
- To highlight where further detailed information and legislation regarding flooding can be found.

**B.150** While not a plan or policy, the Essex Design Guide (2018) [\[See reference 152\]](#) provides a reference to help create high quality places with an identity specific to its Essex context. The Design Guide covers a number of aspects of environmental and socio-economic considerations and therefore relates to a number of sustainability topics, including landscape.

**B.151** Thames Estuary Growth Commission 2050 Vision (2018) [\[See reference 153\]](#) seeks to celebrate the character and heritage of the Thames Gateway area, including the rivers and recognises that heritage assets can help build economic prosperity and create quality of life.

**B.152** Essex Minerals Local Plan (2014) [\[See reference 154\]](#) provides a policy framework for all parties involved in future minerals and minerals related development as it provides a picture of how Essex County Council see minerals development in the County taking place up to 2029, the steps needed to make this happen and the measures necessary to assess progress on the way

**B.153** Essex Historic Landscape Characterisation Project (2013) [\[See reference 155\]](#) seeks to characterise the distinctive historic dimension of the current rural landscape. The project identifies 54 Historic Landscape Characterisation (HLC) types across Essex which are broadly categorised into 10 categories (enclosed land, open land, woodland, parks & gardens, coastal, settlement, industrial, horticulture, military and land use).

**B.154** Thames Estuary 2100 (2012) [\[See reference 156\]](#) sets out the Environment Agency's recommendations for flood risk management for London and the Thames Estuary through to the end of the century and beyond. The Plan sets out the future shape of flood risk management, strategic action that is needed and options to achieve this, local actions that are needed, and how the impact of rising sea levels needs to be addressed. Action Zones 5, 6, 7 and 8 covers the sub-region. Actions have been identified which include hard and soft measures including a floodplain management programme, partnership arrangements to ensure that new development is safe, review and maintain future partnership arrangements and principles and management of defences.

**B.155** Essex Transport Strategy: the Local Transport Plan for Essex (2011) [\[See reference 157\]](#) is a long-term plan covering 15 years which sets out the aspirations for improving travel in the county, demonstrating the importance of the transport network to achieving sustainable long-term economic growth and enriching the lives of Essex residents. The Essex Transport Strategy seeks to achieve five broad outcomes that have been developed in parallel with those

being sought from the Council's Highways Strategic Transformation (HST) programme:

- Provide connectivity for Essex communities and international gateways to support sustainable economic growth and regeneration
- Reduce carbon dioxide emissions and improve air quality through lifestyle changes, innovation and technology
- Improve safety on the transport network and enhance and promote a safe travelling environment
- Secure and maintain all transport assets to an appropriate standard and ensure that the network is available for use
- Provide sustainable access and travel choice for Essex residents to help create sustainable communities.

**B.156** The Thames Estuary 2100 Plan [\[See reference 158\]](#) includes policy recommendations for public realm and access improvements, coinciding with other initiatives such as the Thames Gateway Parklands vision, which envisages improved access and connections with local communities. The Plan introduces the riverside strategy approach. This integrates improvements to flood risk management defences into wider redevelopment, enhancing the social, environmental and commercial aspects of the riverside.

**B.157** The Essex Climate Action Annual Report [\[See reference 159\]](#) highlights the progress made towards creating a cleaner, greener, and healthier environment in Essex. Key achievements include the adoption of a new 30-year Waste Strategy and the launch of a pioneering Water Strategy. Significant investments have been made in nature recovery, rewilding, and biodiversity, alongside commitments to deliver 30,000 net-zero new homes

## Local Plans and programmes of most relevance for the Local Plan

**B.158** Colchester Local Wildlife Sites Network: Partial Review Findings and Recommendations Report (2025) [See reference 160] assesses 26 existing LoWS located within 50 metres of emerging and/or preferred site allocations coming forwards as part of the new Local Plan. The existing LoWS network is considered to be in generally good condition, with one site at Rowhedge Pits identified as being ‘at risk’.

**B.159** Colchester’s Level 1 Strategic Flood Risk Assessment (2025) [See reference 161] provides an overview of the risk of flooding from all sources in the planning authority area. It accounts for the long-term impacts of climate change and considers the impact that land use changes and development could have on future flood risk. It also proposes measures to reduce the causes and mitigate the impacts of flooding.

**B.160** Colchester’s Strategic Biodiversity Assessment (2025) [See reference 162] sets out an approach to conserving and enhancing biodiversity across Colchester and defines strategic biodiversity areas that are of the highest priority for conservation. This comprises thirteen sites of existing blue and green infrastructure including Roman River Valley, River Colne, Salary Brook, Lexden Springs and Hilly Fields.

**B.161** The Water Cycle Study (2025) [See reference 163] assesses the impact of planned development on water supply capacity, sewage capacity and water quality across Colchester. It also identifies constraints to the water cycle and any infrastructure upgrades that may be required. It states that there is sufficient capacity at Birch, Layer-de-Haye, West Mersea and Wormingford water recycling centres (WRC) to accommodate preferred site allocations. Several others, including the Colchester City and Tiptree WRCs, were deemed at risk of future capacity exceedance.

**B.162** Planning for health and wellbeing (2025) [\[See reference 164\]](#) provides baseline health and wellbeing evidence to support Colchester's New Local Plan. The data covers active travel provision, population trends, housing, access to open green and blue spaces, health (in relation to lifestyles and food environments), education, employment and environmental sustainability.

**B.163** Colchester Local Plan Review: Transport Evidence (2025) [\[See reference 165\]](#) reviews the impact of planned development on transport and sets out corresponding mitigation measures. The report concludes that the transport network could accommodate the level of housing and employment growth anticipated through preferred site allocations in the emerging New Local Plan. However, it notes that investment and transport improvements will be required.

**B.164** Colchester Landscape Character Assessment (2024) [\[See reference 166\]](#) creates a comprehensive and up to date strategic-scale landscape evidence base. It also identifies general issues and changes that pose risks to the existing landscape, including development pressure, changes in agricultural practices, severances caused by transport infrastructure, recreational pressures and disturbance, and climate change.

**B.165** Colchester Housing Needs Assessment (2024) [\[See reference 167\]](#) considers the overall need for housing in Colchester. This includes the need for different types of homes, and the needs of different groups within the local community. It estimates that the number of households in Colchester will increase by 7,734 between 2024 and 2024, and forecasts an uncapped housing need equivalent to 1,043 new dwellings per year over the same period.

**B.166** Colchester City Council Gypsy and Traveller Accommodation Assessment (2024) [\[See reference 168\]](#) assesses current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in the council area. It identifies a need for 20 pitches in total: 6 pitches for households that met the planning definition of a Traveller, 9 pitches for undetermined households and 5 pitches for households that did not meet the planning definition.

**B.167** Colchester Retail, Leisure and Town Centre Study (2024) [\[See reference 169\]](#) provides a review of national trends in the retail and commercial leisure sectors and the potential implications the trends have for Colchester's main centres. Between 2024 and 2031, retail capacity is expected to increase by 6,000 sqm for comparison goods and by 850 sqm for convenience goods.

**B.168** Colchester Open Space Report (2023) [\[See reference 170\]](#) outlines what open space provision exists in the area, its condition, distribution and overall quality. This includes parks and gardens, natural and semi-natural greenspace, amenity greenspace, provision for children and young people, allotments and green corridors.

**B.169** Colchester Playing Pitch and Outdoor Sport Strategy (2023) [\[See reference 171\]](#) provides a strategic framework for the maintenance and improvement of existing playing pitch and accompanying ancillary facilities up to 2033. It also provides headline supply and demand figures for existing facilities, with shortfall anticipated for tennis and bowls facilities in particular. Capacity for netball, athletics, cycling golf and other sports is expected to be sufficient to the year 2033.

**B.170** Three-Year Plan 2023-26: A City fit for the Future (2023) [\[See reference 172\]](#) seeks to respond to the challenges of the City. The plan focusses on key topic areas of climate change, service provision, health and wellbeing, housing, economy and heritage and culture.

**B.171** Climate Emergency Action Plan 2024-2027 (2024) [\[See reference 173\]](#) summarises the activities and projects the Council are working on, including those with partner organisations and the community to help make Colchester a city where tackling climate change and reducing environmental impacts is taken seriously.

**B.172** Economic Strategy 2022-2025 (2022) [\[See reference 174\]](#) sets out the role Colchester City Council and our partners will play in ensuring the economy includes everyone and to championing the Real Living Wage. It:

- Highlights the key assets and challenges of Colchester's economy

## Appendix B Review of Plans, Policies and Programmes

- Sets out our vision and priorities, along with principal objectives.
- Explains the thinking behind some of our aspirations
- Provides case studies to illustrate the type of work we will encourage to achieve our priorities
- Highlights the factors that influence us
- Describes how we will work with partners

**B.173** Future Transport Strategy (2022) [\[See reference 175\]](#) seeks to transform Colchester into a place which prioritises active and safe sustainable travel to bring about health, environmental and economic benefits. This vision is underpinned by a series of objectives:

- Providing attractive and healthy environments: Protect, enhance, and improve the quality of the natural, built, and historic environment and reduce air pollution, to enhance residents', workers', and visitors' quality of life.
- Improving sustainable transport modes: Offer an attractive and effective choice of sustainable travel (bus, cycling, walking) to encourage increased use and reduce pressure on the road network.
- Supporting economic growth and connectivity: Provide high quality transport improvements to enhance network connectivity. Support housing and economic growth in Colchester by linking communities together and enabling access to key services, transport hubs, jobs, and education.
- Providing a safer transport environment: Improve safety and the perception of safety within Colchester to promote a safe travelling environment for all road users.
- Managing demand: Manage traffic levels across Colchester's road network and limit levels of traffic in the town centre to reduce delays and improve journey time reliability, maximising capacity through innovative solutions.
- Managing roads and signs: Secure and maintain roads and signage to an appropriate standard and ensure the network is available for use with sufficient resilience to cope with incidents.

**B.174** Housing Strategy 2022-27 (2022) [\[See reference 176\]](#) sets out the Council's ambitions for housing in Colchester over the next 5 years. The Strategy will achieve its aims and objectives through the implementation of the Delivery Plan by working closely with a wide range of partners to achieve the vision for housing in Colchester. The most important priorities identified in Colchester are:

- Addressing key housing issues and challenges;
- Recognising housing as a key determinant for good health; and
- Provide agreement for action and resource decisions.

## Appendix C

### Baseline Information

## Population, Health and Wellbeing

### Population

**C.1** In mid-2024, Colchester's population was estimated to stand at 200,222 [\[See reference 177\]](#). This is an increase of 0.9% (1,725 people) from the figure recorded in mid-2023. Population increase in Colchester has been higher than the overall growth seen nationally, where the population of England and Wales reached approximately 61.8 million in mid-2024, rising by around 1.2% in the year to mid-2024. Nearby areas have also experienced growth, although at more modest rates over the latest year: Maldon's population increased by around 1.1%; Tendring by approximately 1.6%; and Braintree by about 2.4%. Growth in more rural areas such as Babergh has remained comparatively low, consistent with its longer-term slower population change. In mid-2024, approximately 125,828 individuals were aged 16-64, equating to 62.8% of the total population. An estimated 36,045 people in Colchester were 65+ in mid-2024 accounting for an estimated 18% of the population. [\[See reference 178\]](#).

**C.2** A common measure of ageing is the proportion of people aged 65 years and over. In England as a whole, this is projected to increase from 18.2% to 20.7% of the total population between mid-2018 and mid-2028. In Colchester the mid-2018 figure was slightly lower than the national figure at 17.2%. This figure is expected to rise to 18.2% by mid-2028.

**C.3** An alternative measure of ageing is the old age dependency ratio (OADR), defined as the number of people of State Pension age (SPA) per 1,000 people of working age. Working age covers all people aged 16 up to SPA. Earlier estimates indicated a reduction in OADR to the late 2020s, largely reflecting

increases in SPA. However, more recent 2022-based ONS subnational population projections suggest that the proportion of people of State Pension age will increase across most areas over the longer term, reflecting continued population ageing. [\[See reference 179\]](#). The old age dependency ratio (OADR) for Colchester is expected to increase over the longer term, reflecting an ageing population. While earlier projections suggested a rise to around 292.5 by the early 2040s, these estimates were based on superseded datasets. More recent 2022-based ONS subnational population projections indicate that the proportion of people of State Pension age is projected to increase across most areas of England over the projection period.

**C.4** According to the 2021 Census, the predominant ethnic group in Colchester is those who described themselves as ‘White’ (87.0% of the population, a slight drop from 87.5% in 2011). This is higher than the national average of 81.7%. The next highest represented ethnic group in Colchester is those who describe themselves as ‘Asian’ with 5.2% of the population, followed by those who describe themselves as ‘Black’ with 3.4% of the population [\[See reference 180\]](#).

**C.5** According to the 2021 Census, there were 79,710 households in Colchester an increase of 8,076 since 2011. In Colchester, there is a slightly higher percentage of single family households (64.7%) than the national average (63.0%) [\[See reference 181\]](#). The projected number of households in the authority is forecast to grow by 22.4% between 2018 and 2043 which is above the England average (16.2%) [\[See reference 182\]](#).

## Deprivation

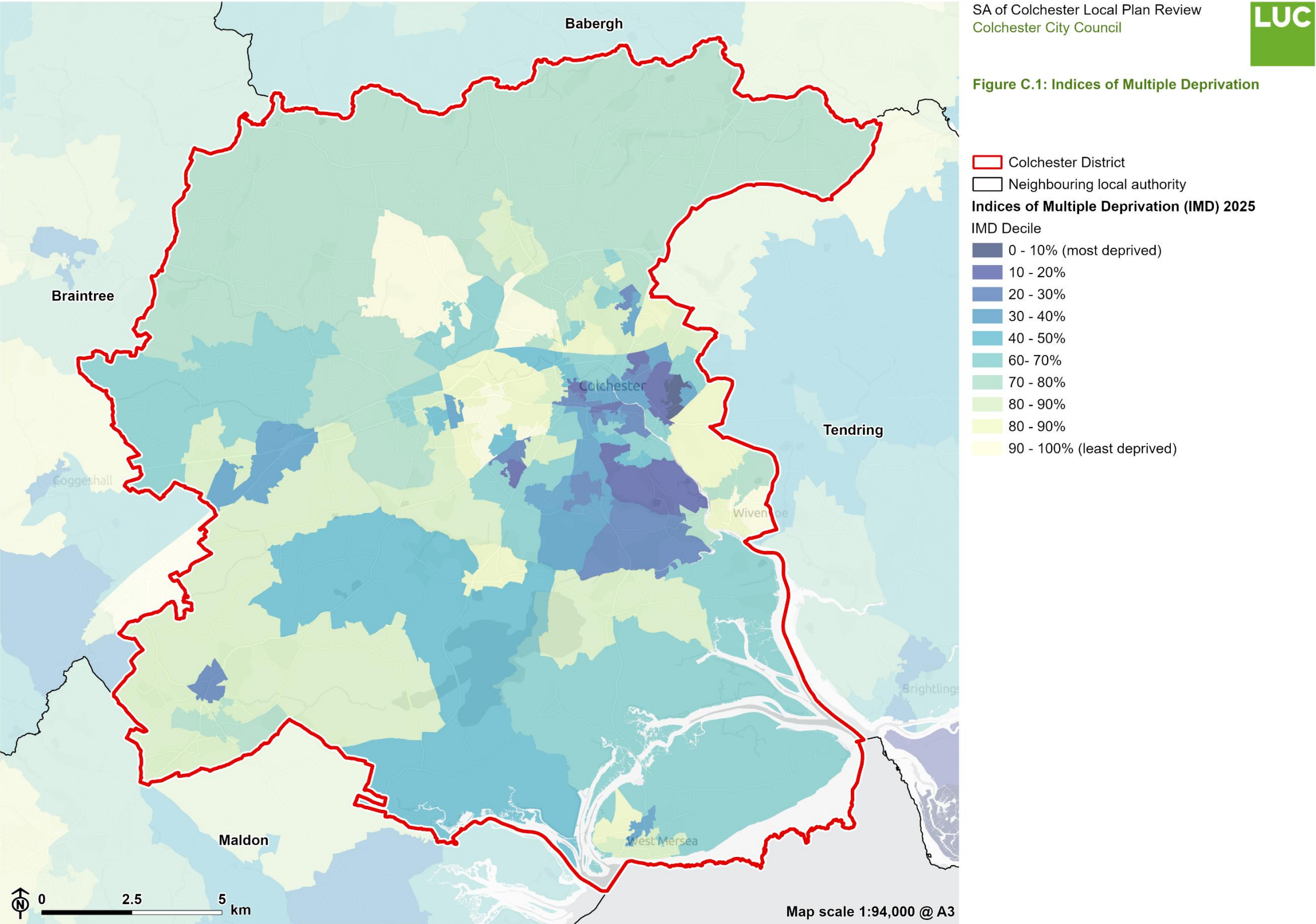
**C.6** The City is relatively prosperous, ranking 173 out of 296 districts on the Index of Multiple Deprivation (rank 1 being the most deprived).

**C.7** According to the English Indices of Multiple Deprivation 2025 [\[See reference 183\]](#), out of the 117 Lower-Layer Super Output Areas (LSOAs) [\[See reference 184\]](#) in the City, 37 are within the top 40% most deprived LSOAs in

the country. These LSOAs are largely concentrated in the wards of Berechurch, Greenstead, New Town & Christ Church, Old Heath & The Hythe and St Anne's & St John's. Colchester has three LSOAs that have remained in the top 20% in most deprived since 2004.

**C.8** Colchester has 19 LSOAs that are in the 20% least deprived in England. The LSOA ranked as the least deprived are located in the ward of Lexden & Braiswick. Prettygate and Wivenhoe were have a total of seven LSOAs fall into the 20% least deprived classification.

Figure C.1: Indices of Multiple Deprivation



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## Housing

**C.9** According to the 2021 Colchester Infrastructure Delivery Plan Update [\[See reference 185\]](#), 920 dwellings per year (totalling 18,400) are expected to be delivered in the City over the adopted local plan period of 2013-2033. As of December 2025, a total of 11,926 dwellings have been completed from a base date of 2012/13 [\[See reference 186\]](#). In the most recent reporting period (2024/25) 659 new dwellings were completed. Since 2001/02, Colchester has overseen the delivery of over 22,285 new homes at an average rate of 927 new dwellings per year. There was a slight fall in delivery in 2020/21 and 2022/23 related to the covid-19 pandemic and the resulting unstable economic climate.

**C.10** Of the 659 dwellings completed in the most recent monitoring period, 188 units were from windfall sites. This is lower than previous years where an average delivery rate of 248 windfall units occurred over the five-year period up to 2023/24.

**C.11** During the same monitoring period, a total of 128 affordable housing units were delivered. This includes 97 new build affordable housing units, of which 72 were Affordable Rent, seven were Social Rent and 18 were Shared Ownership. The comparable figures for the previous two years were 274 in 23/24, 171 in 22/23, 45 in 21/22. Outside of Section 106 and the Council's Development Company, a further 31 affordable units have been delivered through the Council's acquisitions programme. For the year 2024/25, no commuted sums were received for affordable housing.

**C.12** An Essex wide Gypsy and Traveller Accommodation Assessment is currently being undertaken. This will provide baseline information in relation to the gypsy, traveller and travelling showpeople population, including pitch and accommodation needs.

**C.13** According to the English Indices of Multiple Deprivation 2025 [\[See reference 187\]](#), 21 LSOAs are within the 20% most deprived.

**C.14** In June 2026, the average house price in Colchester was £298,000 [\[See reference 188\]](#). In the year to April 2026, the average price for semi-detached properties in Colchester rose by 1.3%, while the average price for flats decreased by 3.9%. Across the East of England, the average house price in April 2026 was £336,000, which was more than the year earlier (£324,000). Across the UK, a home sold for an average of £270,000 in April 2026, which was up from April 2025 when the average house price was £260,000. In 2025, the median affordability ratio for England fell to 7.6, reflecting stronger growth in earnings relative to house prices since 2021. This suggests that while affordability pressures remain, conditions may have eased slightly compared with previous peaks [\[See reference 189\]](#).

**C.15** As of May 2026, the average rent for terraced properties in Colchester rose by 4.7%, while for detached properties, it increased by 4.0%. Average rent for one bed properties rose by 4.9%, while the average for four-or-more bed properties increased by 3.8%. Average rents by property size as of May 2026 in Colchester were:

- One bedroom: £829
- Two bedrooms: £1,075
- Three bedrooms: £1,315
- Four or more bedrooms: £1,819

**C.16** Taking the data instead by property type, average rents were:

- Flats and maisonettes: £966
- Terraced properties: £1,243
- Semi-detached properties: £1,282
- Detached properties: £1,584 [\[See reference 190\]](#).

**C.17** According to the 2021 Census, of the total number of households in Colchester, 10.5% were one bed, 27.6% were two bedrooms, 38.4% of households were three bedrooms, 23.6% were four bedrooms or more. These are similar percentages to 2011. Of these, 21.6% were privately owned; 13.3%

socially rented; 32.3% owns with a mortgage or shared ownership and 32.8% owns outright.

## Health

**C.18** The health of people in Colchester is varied compared with the England average. According to the most recent Local Authority Health Profile for Colchester [\[See reference 191\]](#), life expectancy at birth (over a 3-year range) in the City is estimated at 79.7 years for men and 83.3 years for women. Compared with 2017 to 2019, life expectancy has fallen by 38 weeks from 79.3 years for males and by 23 weeks from 83.0 years for females. This trend has been experienced in most areas of Great Britain and life expectancy improvements are reported to have been slow for the last decade [\[See reference 192\]](#).

**C.19** In 2025 the Colchester area had an all-ages mortality rate of 920 deaths per 100,000 residents, based on 1,798 deaths recorded during that time period. This overall mortality rate was higher than the England average of 913 (per 100,000) [\[See reference 193\]](#).

**C.20** In the period of 2021-2023 it is estimated that 1,086 deaths for all age groups in the Colchester area were preventable. This is equivalent to a rate of 224.4 per 100,000 people, lower than the rate (246.4) for England. Males were 44% more likely to die from a preventable cause (272.8 per 100K) compared to females (179.5 per 100K) during the same period [\[See reference 194\]](#).

**C.21** For the under-75 age group, cancer was the largest cause of preventable mortality with a rate of 103.4 preventable deaths per 100,000 for all persons in 2025. This was lower than the England baseline (114.6) [\[See reference 195\]](#). Cardiovascular disease was the next largest preventable cause with a combined rate of 74.2 per 100,000 for all persons, which is higher than the national rate of 71.5 [\[See reference 196\]](#).

## Obesity and Physical activity

**C.22** In 2024/25, 22% of pupils in Reception year were classed as overweight or obese. This is lower than the level for England (23.5%) and similar to East of England (22.2%). The sample of pupils in Year 6 showed that 32.6% of pupils in this year group were classed as overweight or obese, lower than England (36.2%) and East of England (33.9%) [\[See reference 197\]](#). Of residents aged over 18 years, 64% were classified as overweight or obese in 2024/25. This is higher than the prevalence of adult overweight or obesity across the whole of England (64.6%) [\[See reference 198\]](#).

**C.23** The proportion of adult residents classified as physically active (doing more than 150 minutes of moderate intensity activity per week) in Colchester was 69.1% [\[See reference 199\]](#). This was higher than the proportion of adults physically active across England (68%) but was 5.2% lower compared to levels in 2015/16.

**C.24** Sport England gathers data in relation to active adult and children's lives. In terms of levels of physical activity, being active is someone who does an average of 150+ minutes a week. Across England, 64.6% of adults were considered active between November 2024 and November 2025. Colchester is slightly above the national average at 65.5% of people considered active. 24.7% of people in England are considered inactive as they do less than an average of 30 minutes of exercise a week. Colchester has a slightly higher inactivity rate at 24.8 percent of the population. Walking for leisure remains the most popular activity of choice [\[See reference 200\]](#).

**C.25** The issue of weight and obesity is linked to the local food environment. In 2024 it was estimated that Colchester had a fast-food outlet density of 99.5 per 100,000 population, lower than the average for East of England (100.4) and England (117.8) [\[See reference 201\]](#).

**C.26** There are three hospitals within two miles of Colchester: Essex County Hospital, Oaks Hospital, Colchester Hospital

## Education

**C.27** There are 79 maintained schools in Colchester: 64 primaries, 11 secondaries and 4 special schools. There are two higher education colleges, Colchester Sixth Form College and the Colchester Institute, plus the University of Essex, making the City a major educational base with visiting students significantly adding to the diversity of the population. The provision of day care, nursery education and out-of-school care remains an issue for the City, with there being more demand than formal supply.

**C.28** There is a significant demand for school places in Essex. The total number of pupils by 2030/31 will reach 131,635 primary pupils and 99,693 secondary school pupils (including sixth form) [\[See reference 202\]](#). The City is anticipated to experience significant capacity issues in its primary schools from 2025 onwards, particularly in Colchester North, Colchester Southwest, Stanway and Colchester Rural South. Over the past seven years, various schools in Colchester have expanded to accommodate growing pupil numbers and the following new schools have opened: Braiswick Primary, Camulos Academy, Lakelands Primary; and Paxman Academy and Trinity School secondary schools [\[See reference 203\]](#).

**C.29** Educational achievement in the City is generally good. In 2024/25, 48.4% of pupils in Colchester achieved GCSEs which is higher the national average of 46.0% and the East of England average of 46.2% [\[See reference 204\]](#). Colchester has fewer people with no qualifications (5.8%) compared to the regional (5.3%) and national averages (6.5%) [\[See reference 205\]](#). However, educational attainment is particularly poor in eight LSOAs which are classified as being within the 10% most deprived under the Education, Skills and Training domain in the English Indices of Multiple Deprivation (Greenstead, St. Anne and St. John's, and Berechurch) [\[See reference 206\]](#).

## Community Facilities

**C.30** The community has access to a wide range of Council-run services and facilities, including those owned by the 31 Parish Councils in the City. Facilities include country parks at Cudmore Grove in East Mersea and High Woods in Colchester, a leisure centre including swimming pools and four multi-activity centres, and a 10,000-seat capacity football stadium. A 76-acre sports park opened in April 2021 which features a multi-use sports centre, one mile cycle track, 3G pitches, grass rugby pitches, fitness suite, exercise studios, velo studio, indoor cricket, badminton, futsal, and archery.

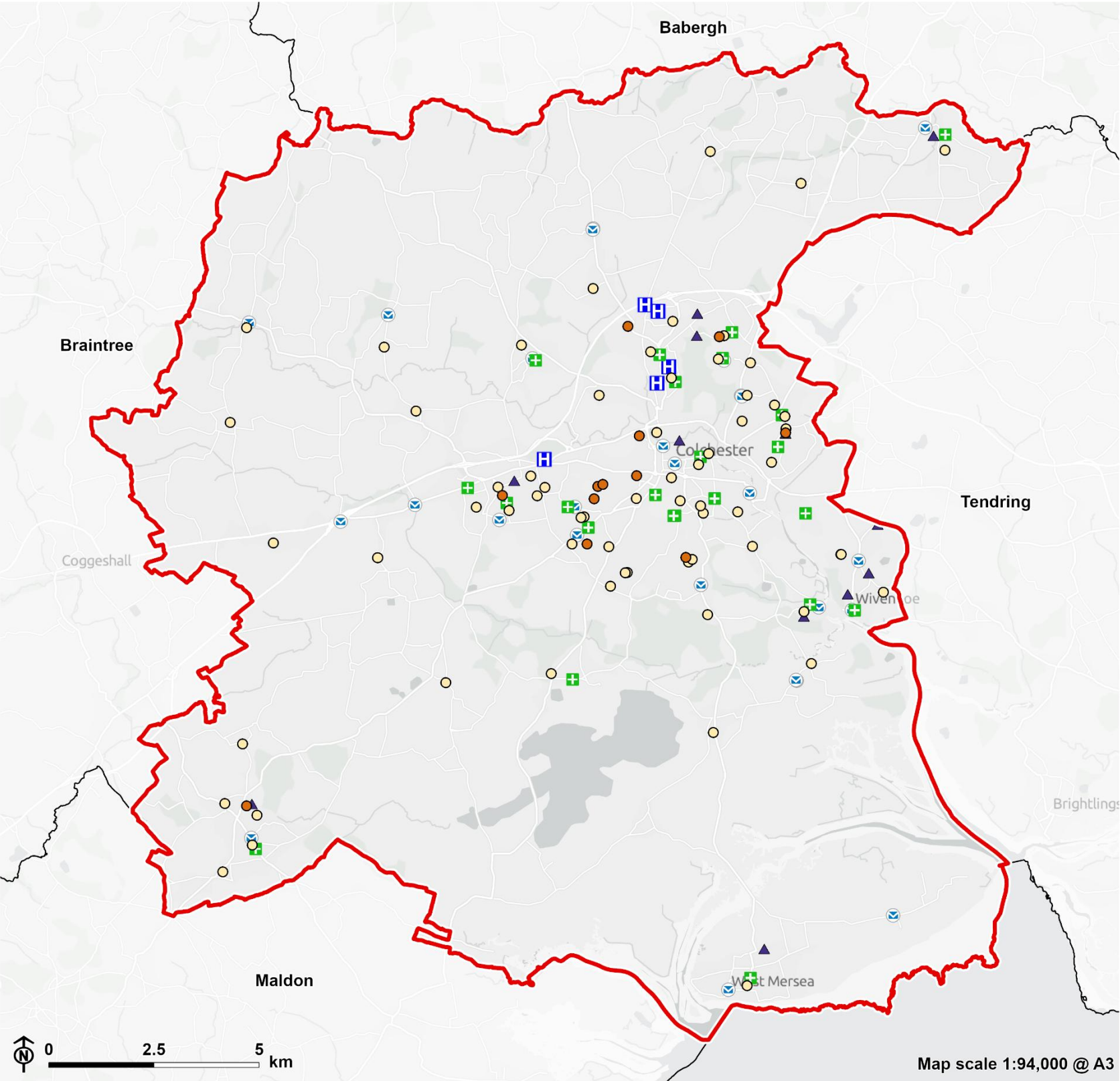
**C.31** Colchester has an extensive green infrastructure network. In 2023, KKP carried out an audit of open spaces [\[See reference 207\]](#). This audit captured a total of 440 sites equating to approximately 954 hectares of open space. The largest contributor to provision is natural/semi-natural greenspace (604 hectares); accounting for 63%. The table, below, summarises the number and amount of open space by typology.

**Table C.1: Overview of open space provision**

| Open space typology                   | Number of sites | Total amount (hectares) <sup>3</sup> |
|---------------------------------------|-----------------|--------------------------------------|
| Allotments                            | 23              | 28                                   |
| Amenity greenspace                    | 134             | 267                                  |
| Natural & semi-natural greenspace     | 62              | 604                                  |
| Park and gardens                      | 3               | 49                                   |
| Provision for children & young people | 118             | 6                                    |
| <b>TOTAL</b>                          | <b>440</b>      | <b>954</b>                           |

**C.32** The audit recommended a list of sites that help or have the potential to help serve areas identified as having gaps in catchment mapping. These should be prioritised as opportunities for enhancement.

Figure C.2: Services and Facilities in Colchester



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Figure C.2: Services and Facilities in Colchester

- Colchester District
- Neighbouring local authority
- Sports and recreation facility
- Post office
- Primary school
- Secondary school
- GP surgery
- Hospital

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## Crime

**C.33** The absence of a safe and secure place in which to live can have an extremely negative impact on physical and emotional health and wellbeing.

**C.34** In September 2025, Colchester recorded 80.47 crimes per 1,000 people. This had increased from 80.21 crimes per 1,000 people in the last equivalent period. The number of recorded offences (excluding fraud) in Colchester for the past 12 months was 16,111. This ranks Colchester 28th out of 39 in all local authority districts in East of England. The most frequently recorded crime over this period was 'violence against the person – without injury offences recorded'. The next most prevalent crimes were stalking and harassment, 'violent against the person – with injury offences recorded', shoplifting, and criminal damage and arson. This remained unchanged to the equivalent period in 2024 [\[See reference 208\]](#).

## Economy

### Economy and Employment

**C.35** According to the latest labour market statistics (January 2025 to December 2025) [\[See reference 209\]](#), 80.5% of working-age residents in Colchester are economically active. Of these, 76.0% are in employment, including 68.1% employees and 7.9% self-employed. The modelled unemployment rate is approximately 4.1%. A total of around 19.5% of residents are economically inactive, which is lower than the East of England (18.2%) The relatively high proportion of economically inactive residents reflects, in part, the presence of a large student population associated with the University of Essex.

**C.36** Colchester's job density (0.83) is slightly lower than the national average (0.85) however matches the regional average (0.83). The occupational structure of Colchester is characterised by a relatively high proportion of professional and

associate professional occupations, alongside administrative and secretarial roles. The largest employment sectors in Colchester remain human health and social work activities, wholesale and retail trade (including motor vehicle repair), and education, reflecting the area's strong public sector and service-based economy. Major employers include Colchester Hospital University NHS Foundation Trust, the University of Essex, Colchester City Council, and Colchester Institute. The private sector also plays an important role, with firms such as Monthind Clean Ltd providing significant employment locally.

## Retail

**C.37** Colchester has approximately 435,000m<sup>2</sup> of retail floorspace; 208,000m<sup>2</sup> of office floorspace; 644,000m<sup>2</sup> of industrial floorspace; and 110,000m<sup>2</sup> classed as 'other' floorspace. According to the 2024 Retail, Leisure and Town Centre Study Update [\[See reference 210\]](#), vacancy levels in Colchester town centre have increased from 10.5% of total ground floor premises to 18.6%. This is above the national average of 14%. Between 2024 and 2031, retail capacity is expected to increase by 6,000 sqm for comparison goods and by 850 sqm for convenience goods [\[See reference 211\]](#).

**C.38** The Council's adopted Local Plan Topic Paper on Retail and Town Centre Policies [\[See reference 212\]](#) reports that Colchester town centre continues to perform reasonably well against many of the health check indicators. Yet there are weaknesses and signs that the town centre is increasingly vulnerable to structural changes in the retail sector and growing competition from nearby shopping destinations. The current outlook and developments at Tollgate (Stanway) in particular, reinforce the need for measures to maintain the city centre's attractiveness and role as the principal mixed-use shopping destination in Colchester City. This includes continued investment in the public realm and key opportunity sites (including Vineyard Gate, Priory Walk and St John's Walk Shopping Centre) to improve the visitor experience and create a more vibrant, differential offer. A city centre masterplan supplementary planning document was adopted by the council in January 2024 [\[See reference 213\]](#).

**C.39** The health and position of other centres within the urban area of Colchester (Peartree Road, Turner Rise and Highwoods) and in Tiptree, West Mersea and Wivenhoe remain stable.

**C.40** There will be an overall (City-wide) theoretical over-supply of comparison and convenience retail floorspace over the plan period to 2033 principally due to the major committed developments, particularly at Tollgate and non-central stores in the City.

**C.41** The analysis of leisure uses in the Retail and Town Centre Study Update concluded that the Council should not allocate sites for new commercial leisure provision in the City. There are no obvious quantitative or qualitative ‘gaps’ based on existing supply and the proposed new commercial leisure developments identified.

## Tourism

**C.42** Tourism plays an important part in the local economy. Tourism contributed £382.6 million to the Colchester’s economy in 2022. The value of tourism to Colchester has risen in real terms by 158% from £63.1 million in 1993. Tourism supports more than 5,224 full time jobs, equating to 9% of total employment in the City. Colchester attracted 6,207,000 day-trips and 229,000 overnight trips in 2022. This is approximately 1% higher than the 2017 figure, resulting in a total value of £379,393,300 [\[See reference 214\]](#).

## Creative Businesses

**C.43** Colchester has 1,300 creative businesses providing employment to over 5,600 employees. Creative industries are a priority growth area for the town. This accounts for 18.3% of all businesses in the city, and includes advertising, design, film, arts and crafts, performing arts and publishing. Nationally, creative industries account for approximately 7% of the economy as a whole. This

shows that Colchester is a well-performing town in terms of its creative economy but that there is considerable room for growth.

**C.44** In 2024/25, Colchester Council generated a £24 million boost to the local economy through a programme of concerts, gigs, festivals, weddings and civic events. Amphora Events is the council-owned venue and events management company responsible for the programme, which took place across Charter Hall, Colchester Town Hall and Castle Park. These events drew 300,000 attendees in 2024/25, including 179,000 visitors from outside the city [\[See reference 215\]](#).Regeneration

**C.45** Colchester City Council is leading regeneration programmes in east Colchester, north Colchester, the city centre and the Garrison. The longstanding regeneration programme at the Hythe includes 100,000 sq. ft of commercial space, 2000 new homes, improved transport links, a community centre, nursery and student accommodation for the University of Essex at University Quays. The University Knowledge Gateway will continue to bring new business opportunities, hotels and leisure facilities.

**C.46** The northern gateway lies to the north and south of Junction 28 of the A12 and is transforming into a new sport, leisure, business and residential destination of regional significance. The Colchester Sports Park opened in 2021. Work was completed on the construction of the 200,000 sq ft Leisure Park in early Summer 2024. The northern gateway includes world-class digital connectivity, easy access to the regional transport network, and high-quality urban design. The Council's aspiration is that the Northern Gateway will become a thriving location for living, playing, working and doing business and promote healthy lifestyles.

**C.47** A £1.5 billion development of a new modern Garrison in the town has shown a further 35 years' commitment to Colchester by the MoD. As well as creating improved accommodation and facilities for service personnel, land released by the MoD as a result of the new development has been used to create a sustainable mixed use urban village close to the city centre.

**C.48** Improvements in the city centre have previously been focused on the St. Botolph's Quarter, with ongoing plans to develop a new cultural quarter, large retail scheme, residential development and multi-storey car park. However, plans to improve the wider city centre are now underway with proposals being developed to reduce traffic and create a better pedestrian experience with more public spaces for events and activities and better links for cyclists ensuring that Colchester continues to be a vibrant place during the day and in the evening. The City has been awarded £18.2 million from the Government's Town Fund to boost a range of projects to improve the town centre including the creation of digital work hubs, accelerated introduction of 5G, restoration of the Holy Trinity Church, and phase one of restoring 'Jumbo' the iconic Victorian water tower. A supplementary planning document for the city centre was adopted in January 2024 [See reference 216]. The Council have worked in partnership with Essex County Council to progress the masterplanning work for Colchester City Centre. The pivotal role and influence of the highway network within the City Centre and the need and opportunities for enhancement are fundamental to the joint approach ventured for the preparation of the City Centre Masterplan SPD. The redesign of the St Botolphs Circus roundabout (largely externally funded project) as a key southern gateway to the city centre formed part of the joint consultation and the design solution has evolved in response.

**C.49** The focus/scope of the Masterplan is on the core city centre area - the primary and secondary shopping areas as defined in the Local Plan, as well as the main city centre development allocations and gateways to the surrounding neighbourhoods. However, the continued economic and cultural vibrancy of the city centre lies in reconnecting it to the surrounding neighbourhoods and improving choice in transport modes including the walking and cycling experience of routes to the mainline rail station, the Roman Circus and the Hythe and University campus in particular. The Masterplan therefore includes recommendations for wider area improvements with regard to connectivity into and through the city centre and associated public realm. Design frameworks have been prepared for the main city centre development allocations and gateways, which have been referred to as key sites.

## Transport and Accessibility

**C.50** Colchester is connected to a comprehensive network of major roads via the A12 and A120, which provide routes to London, the M25, Harlow and Cambridge. Parts of the A12 carry over 90,000 vehicles a day. The city also lies in close proximity to the major seaports of Harwich (around 30km) and Stansted airport (around 50 km). This strategic position has meant the area has been a magnet for growth resulting in a healthy and vibrant economy.

**C.51** Transportation provision in the City includes six railway stations; bus routes operated by ten bus companies; and several cycle trails including National Cycle Network routes 1, 13 and 51. Railway stations in the City include those (Colchester and Marks Tey) that provide access to the Great Eastern Mainline which connects London to Norwich.

**C.52** Essex County Council consulted on the Colchester Local Cycling and Walking Infrastructure Plan (LCWIP) up to September 2023 [\[See reference 217\]](#). The finalised LCWIP identifies 13 primary cycling routes and 12 primary walking routes across the city's urban area [\[See reference 218\]](#).

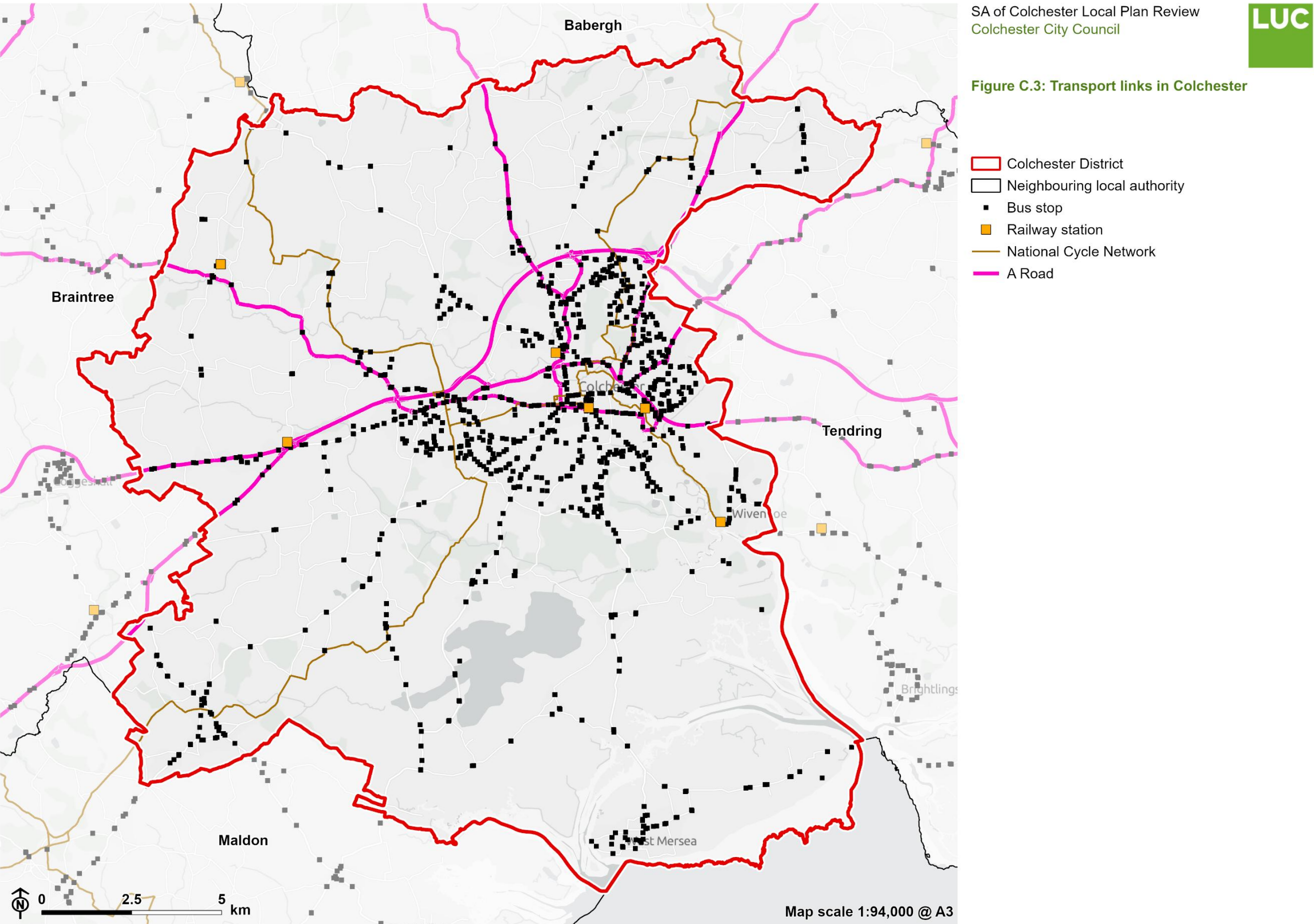
**C.53** One of the biggest challenges to Colchester's future development is traffic growth and the dominance of the car as the main mode of travel. The 2021 Census travel to work results found that 47.4% of residents in Colchester drive to work. This is higher than the England average of 44.5%. A slightly higher proportion of residents in Colchester travel to work by train (2.2%), bicycle (2.5%) or foot (8.7%) compared to the national averages. However, a smaller proportion of residents in the City travel to work by bus (2.9% compared to 4.3% nationally). Most journeys for work in Colchester (35.2%) are less than 10km and many people work from home (30.6%) [\[See reference 219\]](#).

**C.54** The Colchester Future Transport Strategy found that journeys to work have the most significant impact on the road network. However, it is recognised that other reasons for travel (for example the school run and shopping trips) can see increased traffic in between peak periods. There are notable congestion

issues in the city centre at weekends. Within the centre, many roads are noted to be over capacity during peak periods. Particular hotspots include parts of the A12 and A120 strategic routes and on local roads within the city area such as the A133 Cymbeline Way, A1124 Lexden Road, and A1232 Ipswich Road [\[See reference 220\]](#).

**C.55** According to research from the Office of National Statistics, of the 92,400 people who work in Colchester, 17,300 workers travel there for work with the remainder living and working in the area. The largest movement into Colchester is 6,700 people from Tendring, followed by Braintree (2,700 people) and Babergh (1,800 people). 16,900 residents in Colchester travelled to other locations for work. The largest movement of people out of Colchester for work is 3,300 people to Tendring, followed by Braintree (3,000 people) and Chelmsford (2,000 people). Within Colchester, the MSOA with the largest workday population is Central Colchester which experiences an influx of 7,800 people for work from other areas [\[See reference 221\]](#).

Figure C.3: Transport Links in Colchester



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## Air, Land and Water Quality

### Air

**C.56** Whilst the City of Colchester is extensively rural, most of the population live in the towns and villages. As a result, it is the built-up areas which figure most prominently in many people's lives and the appearance and quality of their urban surroundings is an important factor in their quality of life. The main source of air pollution in the City is road traffic emissions from major roads, notably the A12, A120, A133, A134, A1232, Brook Street and Mersea Road. As the oldest recorded Roman town in Britain, Colchester has many narrow roads within the town centre and surrounding areas, buildings flank to form a canyon like environment. Street canyons act to reduce dispersal of pollutants which can result in poor air quality. Also, as highlighted in the previous section on 'Transport and Accessibility', significant traffic congestion can occur during peak times within Colchester directly affecting local air quality.

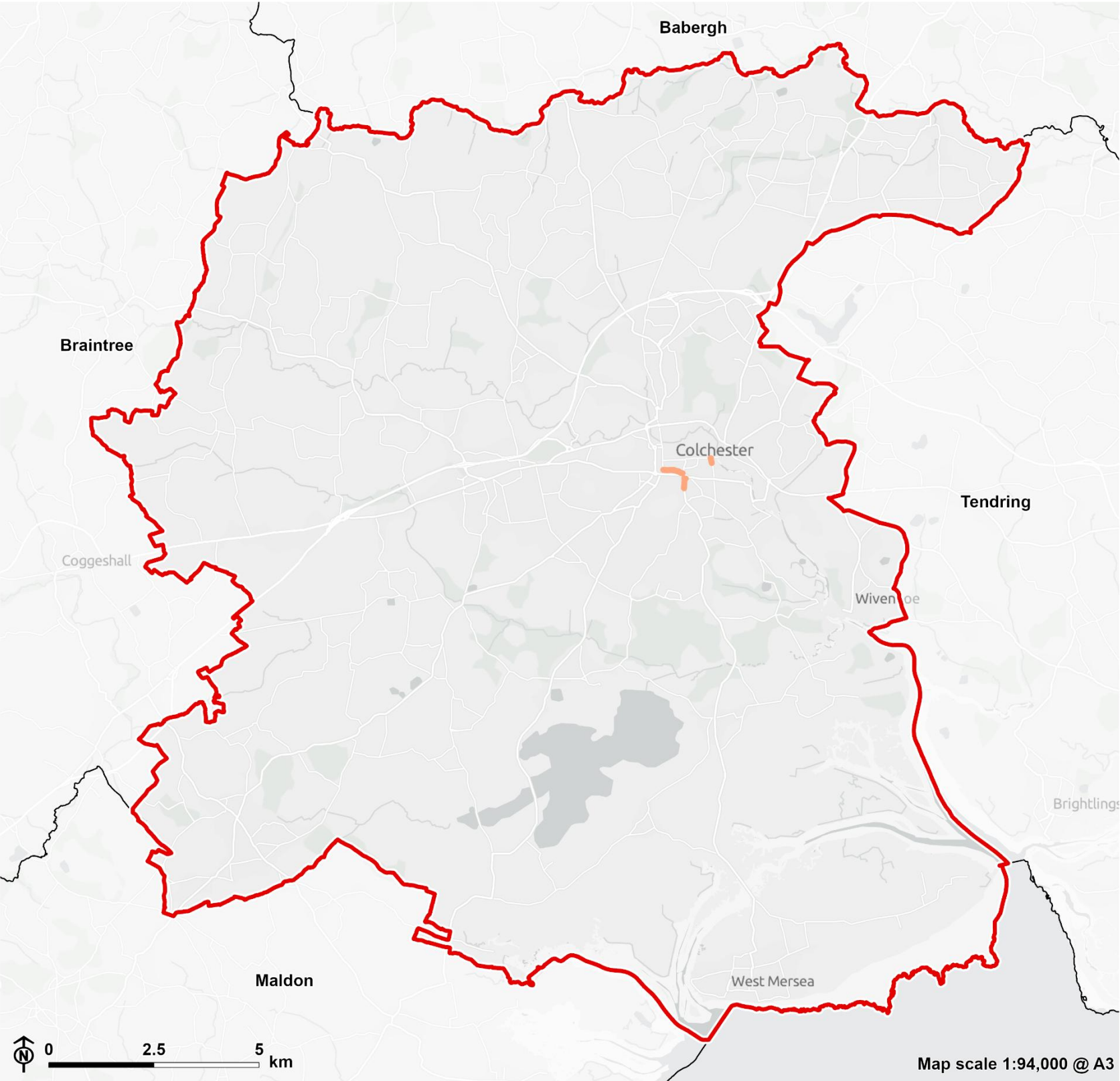
**C.57** There are 62 air pollution testing sites throughout the City. In May 2024, two AQMAs were revoked in Colchester due to improved air quality; AQMA 2, East Street and AQMA 4, Lucy Lane North. The one remaining AQMA has been reduced to encompass only non-compliant areas: Brook Street, Osborne Street, St Johns Street and Mersea Road.

**C.58** According to the latest Air Quality Annual Status Report for Colchester [\[See reference 222\]](#). The general trend across Colchester is of improved air quality. In 2025, Colchester City Council adopted a new Air Quality Action Plan. The main priority for this Air Quality Action Plan is to achieve compliance with the nitrogen dioxide (NO<sub>2</sub>) annual mean objective in Mersea Road. The main measure to achieve this objective is to deliver the St Botolph's Circus regeneration project. The anticipated construction dates for St Botolph's are January 2026 to July 2027 and it is expected that compliance with the Air Quality Objectives will be measured in the first calendar year after completion. However, it would not necessarily be appropriate to revoke the AQMA without further monitoring to comply with Defra guidance for AQMA revocation.

Additional measures in the Action Plan will help improve air quality in the Brook Street AQMA and the Osborne Street and St John's Street AQMA which already comply with the Air Quality Objectives but in line with Defra guidance, are not yet eligible to have the AQMA revoked.

**C.59** CAREless Pollution is a Colchester-wide campaign that launched in October 2020. The Careless Pollution campaign was nationally recognised and was awarded Highly Commended in Edie's National Sustainability Leaders Awards 2022. It encourages drivers to switch off their engines when stationary to help improve air quality and to reduce the amount of polluted air that people breathe inside their cars. A toolkit has been produced to provide schools in Colchester with ideas for involving and inspiring young people to understand more about the air quality around them and encouraging everyone to take action to help improve air quality in Colchester. The roadside signage trial (funded by the 2nd successful Defra bid) has come to an end but has led to a 11% increase in engine switch offs on Brook Street and at East Gates. At East Gates alone approximately 260 additional vehicles were switching off their engines every week preventing an estimated 91g of Nitrogen Dioxide per week entering the air (based on a 5-minute wait). The findings mirror the results of short-term trials in Kent where signage has now been made permanent. Following the study, the Council are making a recommendation to apply for planning permission to have the signage on Brook Street and East Gates put up permanently and to use the remainder of the DEFRA budget to identify and fund further locations within the City's AQMAs for signage.

Figure C.4: Air Quality Management Areas



SA of Colchester Local Plan Review  
Colchester City Council



Figure C.4: Air Quality Management Areas

- Colchester District
- Neighbouring local authority
- Air Quality Management Area (AQMA)

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## Water

**C.60** The main rivers in Colchester are the River Colne, River Stour, Layer Brook and the Roman River. Colchester lies within the Anglian River Basin District which covers a total area of 27,900km<sup>2</sup>. The majority of Colchester is within the Essex Combined Management Catchment. Within the Essex Combined Management Catchment is the Colne Essex Operational Catchment (16 waterbodies), the Blackwater Operational Catchment (five waterbodies), and the Stour Operational Catchment (21 waterbodies).

**C.61** The Colne and Blackwater estuaries are within the Anglian Transitional and Coastal Catchment Area (TraC) Management Catchment. Within the Anglian TraC is the Essex TraC Operational Catchment which contains nine waterbodies.

**C.62** The Water Environment (Water Framework Directive) Regulations (2017) [\[See reference 223\]](#) looks at the ecological and chemical health of both groundwater and surface water with the aim of achieving 'good ecological status' and 'good chemical status' by 2027, and to ensure that there is no deterioration from existing statuses.

**C.63** In 2022 [\[See reference 224\]](#):

- Of the 16 waterbodies in the Colne Essex catchment, nine were of moderate ecological status, five were of poor ecological status, one was in good ecological status, and all 16 failed to achieve good chemical status. Of the waterbodies in Colchester, the Salary Brook, the Colne (d/s Doe's Corner), and the Roman River were all of moderate ecological status while Layer Brook was of poor ecological status. The reasons for not achieving good status were due to the following sectors: agriculture and rural land management, the water industry, urban and transport, local and central government, and industry.

**C.64** Of the five waterbodies in the Blackwater catchment, four water of moderate ecological status and one was of good status, while all five failed to

achieve good chemical status. In Colchester, Virley Brook and Blackwater River were of moderate ecological status while Domsey Brook was of good ecological status in 2022. The reasons for not achieving good status were due to the following sectors: agriculture and rural land management, the water industry, local and central government, urban and transport, and industry.

**C.65** Of the 21 waterbodies in the Stour (Essex) catchment, 17 were of moderate ecological status, two were in good ecological status, two were in poor ecological status, and all failed to achieve good chemical status. In Colchester, the Stour (d/s R. Brett) River and the Stour (Lamarsh – R. Brett) River were both of moderate ecological status. The reasons for not achieving good status were due to the following sectors: agriculture and rural land management, the water industry, urban and transport, and, local and central government.

**C.66** The nine waterbodies in the Essex TraC catchment were all of moderate ecological status but failed to achieve good chemical status, including the following waterbodies in Colchester: the Colne transitional waterbody, Blackwater transitional waterbody, the Blackwater Outer coastal waterbody and the Stour (Essex) transitional waterbody. The reasons for not achieving good status were due to the following sectors: agriculture and rural land management; local and central government; and the water industry [\[See reference 225\]](#).

**C.67** Colchester is in one of the driest regions in the UK and water is under pressure from population growth and climate change. The area supplied by Anglian Water (which includes Colchester) is classed by the Environment Agency as experiencing serious water stress [\[See reference 226\]](#).

**C.68** Colchester's potable drinking water comes from Ardleigh Reservoir. On average Anglian Water customers use around 126.2 litres of water per person per day [\[See reference 227\]](#). This is lower than the national average of 136.5 litres per person per day. Anglian Water expects this to be reduced to around 109 litres per person per day for 2050 [\[See reference 228\]](#). However, in summer 2021 Anglian Water issued a warning urging people to limit water

consumption due to an unprecedented demand on water supplies [\[See reference 229\]](#).

# Soil and Geology

**C.69** Colchester City comprises a mix of different soils, primarily consisting of:

- Slightly acid loamy and clayey soils with impeded drainage to the north and east of the City;
- Slowly permeable, seasonally wet, slightly acid but base rich loamy and clayey soils to the south;
- Freely draining, slightly acid loamy soils to the west, as well as patches of lime rich loamy and clayey soils with impeded drainage; and,
- Loamy and clayey soils near the estuary.

**C.70** The Agricultural Land Classification (ALC) system [\[See reference 230\]](#) provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations to agricultural use. The principal factors influencing agricultural production are soil wetness, drought and erosion. These factors, together with interactions between them, form the basis for classifying land use into one of five grades, where 1 describes land as excellent (land of high agricultural quality and potential) and 5 describes land as very poor (land of low agricultural quality and potential). Land falling outside these scores is deemed to be 'primarily in non-agricultural use', or 'predominantly in urban use'. Grade 3 can be further separated into grades 3a and 3b. Grades 1, 2 and 3a are considered to be best and most versatile agricultural land. According to Natural England's Agricultural Land Classification, land within Colchester City primarily comprises of large swaths of Grade 2 and Grade 3 agricultural land to the north and west of the City and Urban land and Non-Agricultural land to the east.

**C.71** Important geological sites in Colchester include:

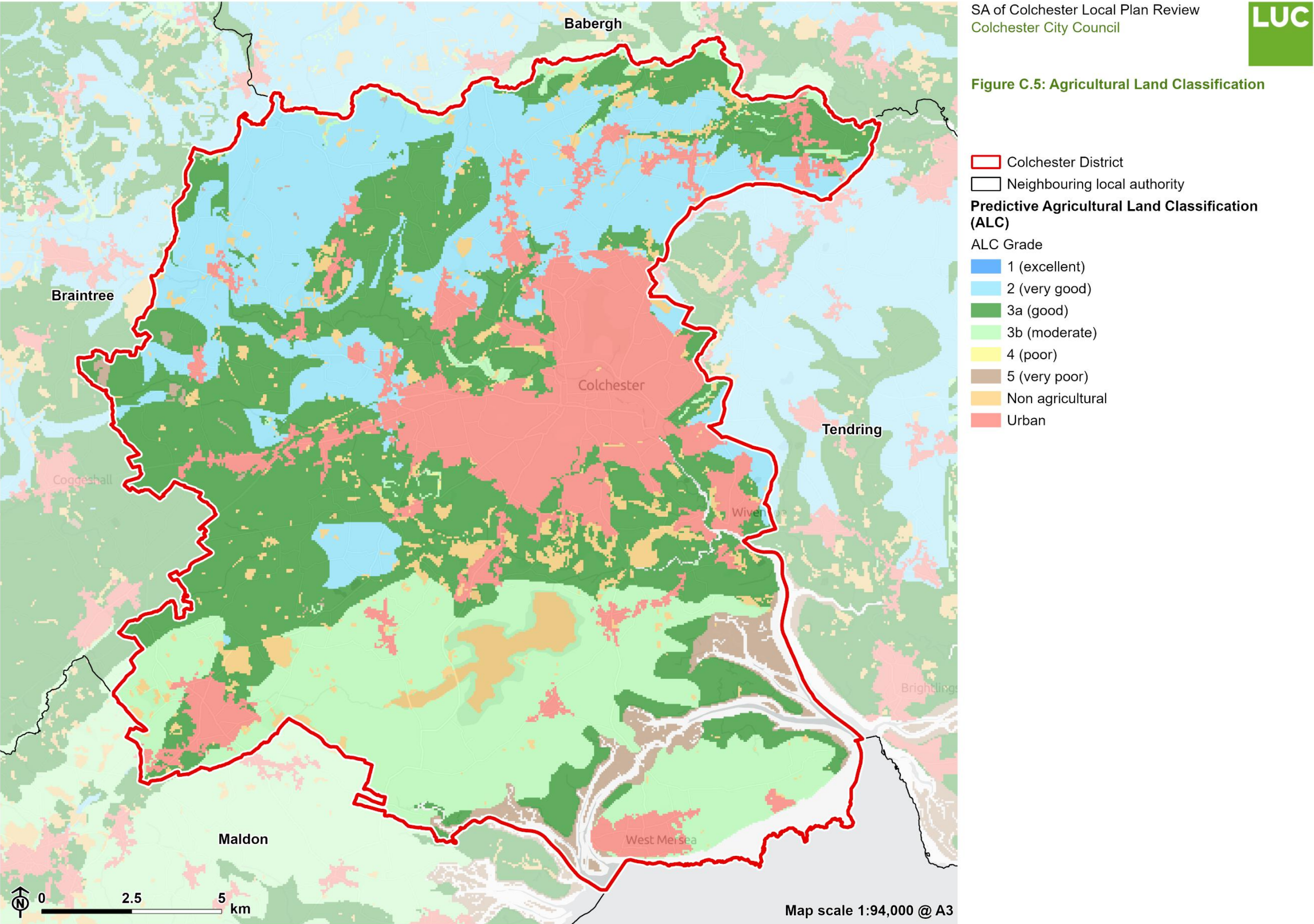
- Coopers Beach ('Restaurant Site') (part of Colne Estuary SSSI);

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- Cudmore Grove Cliffs and Foreshore (part of Colne Estuary SSSI);
- Marks Tey Brick Pit SSSI;
- Wivenhoe Gravel Pit SSSI; and,
- Fingringhoe Wick Nature Reserve.

**C.72** Currently, there are no entries on Colchester City Council's contaminated land register [\[See reference 231\]](#). As of March 2023, 24 sites were recorded on the City's Brownfield Register [\[See reference 232\]](#).

Figure C.5: Agricultural Land Classification



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## Climate Change Mitigation and Adaptation

**C.73** Colchester City declared a climate emergency on 17 July 2019 and subsequently prepared a Climate Emergency Action Plan [\[See reference 233\]](#), with the following aims:

- Reduce carbon emissions for buildings and fleet to help achieve carbon neutrality for Council services by 2030;
- Produce renewable energy;
- Enhance biodiversity and protect our environment;
- Facilitate walking, cycling and sustainable transport around Colchester;
- Provide sustainable waste management and support residents to reduce, reuse and recycle;
- Enable partnerships and community action for sustainability and low carbon development;
- Ensure sustainable planning and development; and,
- Change the way we work to achieve our climate commitment.

**C.74** An update to the action plan was published in January 2023 [\[See reference 234\]](#), which slightly amended the themes to include the new theme of adapting to a changing climate, introduced air quality to the walking, cycling and sustainable transport theme, and introduced reference to the green economy.

**C.75** Changes to the climate will bring new challenges to the City's built and natural environments. Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. The UK Climate Projections (UKCP18) show that in 2050 the climate in the South East will be warmer with wetter winters and drier summers than at present [\[See reference 235\]](#). Specifically:

- Under medium emissions, the increase in winter mean temperature is estimated to be 2.2°C; it is unlikely to be less than 1.1°C and is very unlikely to be more than 3.4°C.
- Under medium emissions, the increase in summer mean temperature is estimated to be 2.8°C; it is unlikely to be less than 1.3°C and is very unlikely to be more than 4.6°C.

**C.76** A changing climate may place pressure on some native species and create conditions suitable for new species, including invasive non-native species. Changes to precipitation patterns (and river flow) and flooding have implications and dry, hot summers will cause problems of low flows for some of the rivers in the area which will increase demand for water. Extreme weather events may also increase disruption.

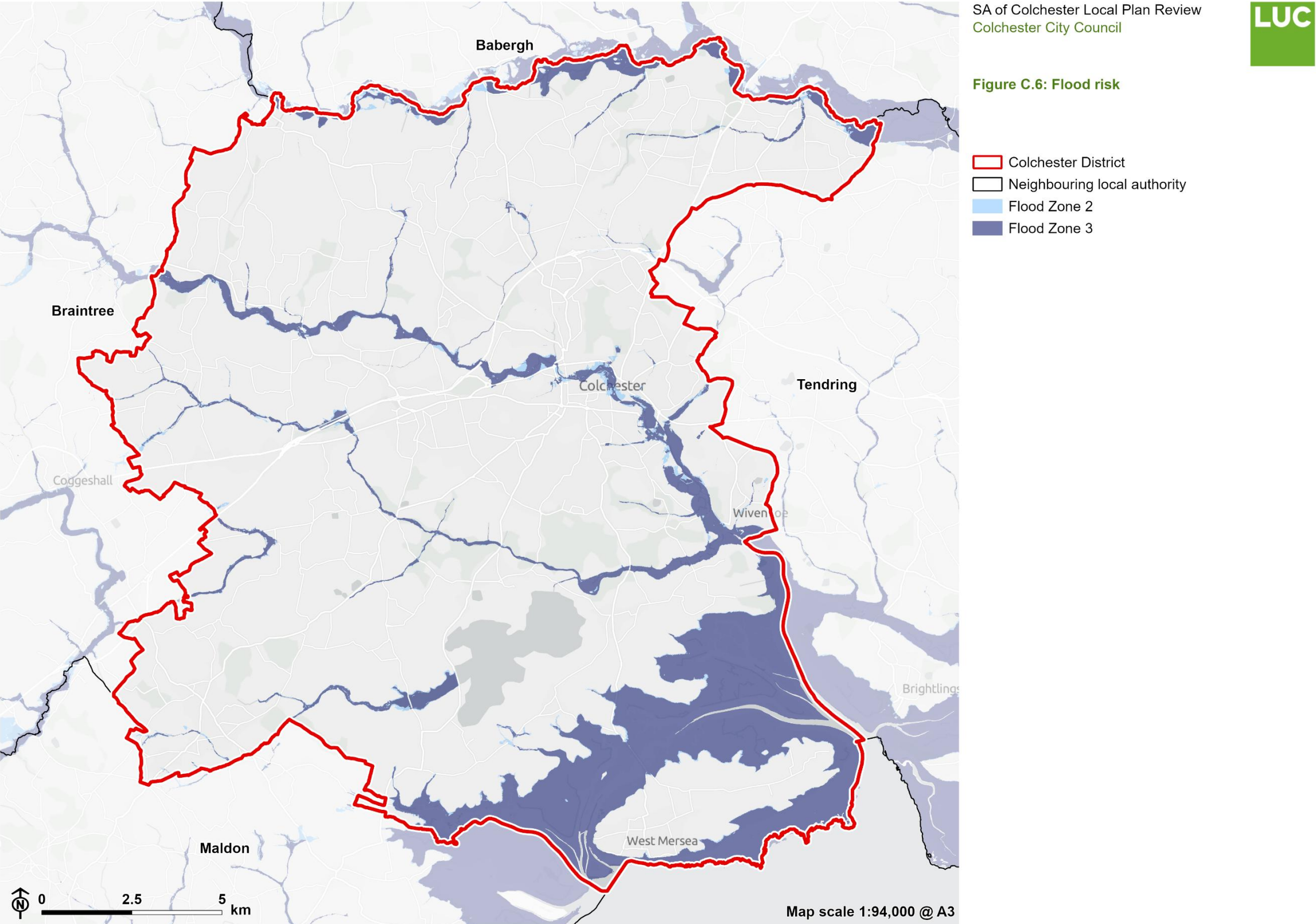
**C.77** Colchester City contains both tidal (estuary) and fluvial (river) watercourses. The River Colne is the main pathway of tidal flooding which can result from a storm surge, high spring tides or both events. The upstream extent of the River Colne presents the main fluvial risk to the area. Other fluvial flood risk areas identified in the City are from the River Stour, Layer Brook and Roman River. The City is also at risk of flooding from groundwater, surface water and the arterial drainage network, particularly as a result of blockages of ditches or sewers. The most significant flood events reported to have affected the City occurred in 2000, 2001, and 2012. The risk of flooding is likely to be intensified due to climate change.

**C.78** The latest Department for Energy Security and Net Zero (DESNZ) figures [\[See reference 236\]](#) show generally decreasing trends for greenhouse gas emissions (kilotonnes CO<sub>2</sub> equivalent) in Colchester from 2005 to 2024 despite an increase in population over this time-period. However, there was an increase in 2019, 2021 and 2024. Greenhouse gas emissions have fallen from 1,353.9kt to 784.3kt over the period between 2005 and 2024. Per capita greenhouse gas emissions have fallen from 8.4 tonnes in 2005 to 3.9 tonnes in 2024. Generally per capita CO<sub>2</sub> emissions have decreased each year, but 2021 showed a slight increase from 4.7 tonnes in 2020 to 4.8 tonnes per capita in 2021. The decreasing trend in emissions reflects the decrease in overall emissions for the

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UK during this period driven mainly by reductions in emissions from power stations, industrial combustion and passenger cars. The reduction from power stations is driven by change in the fuel mix used for electricity generation with a reduction in the amount of coal, which is a carbon intensive fuel. Emissions for many Local Authorities are heavily influenced by activities at industrial sites, and changes at a single site can have a big impact on emissions trends [\[See reference 237\]](#).

Figure C.6: Flood Risk



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## Biodiversity

**C.79** Colchester has a rich biodiversity with many sites designated for their nature conservation interest. Much of the coastline is designated under international notifications including the Essex Estuaries Special Area of Conservation (SAC), the Blackwater Estuary Special Protection Area (SPA), the Colne Estuary SPA and Abberton Reservoir SPA. The SAC and SPAs are notified under the Habitats Directive (92/43/EEC) and Birds Directive (79/409/ECC) respectively. They are also notified as Ramsar sites under the Ramsar Convention.

**C.80** Abberton Reservoir is a large, shallow, freshwater storage reservoir approximately around 10km south-west of Colchester. It is built in a long, shallow valley and is the largest freshwater body in Essex and one of Europe's top wetland sites. It is one of the most important reservoirs in Britain for wintering wildfowl, with a key role as a roost for wildfowl and waders feeding in adjacent estuarine areas. The site is also important for winter feeding and autumn moulting of waterbirds. The margins of parts of the reservoir have well-developed plant communities that provide important opportunities for feeding, nesting and shelter. Abberton Reservoir is important especially as an autumn arrival area for waterbirds that subsequently spend the winter elsewhere. Abberton Reservoir is a public water supply reservoir. Reduced water availability, and increased demand, in recent years has led to generally low water levels; greater numbers of waders therefore use the site, and as a result no decrease in wildfowl has been attributed to low water levels. Water entering the site has elevated nitrate levels, leading in most summers to algal blooms, but there is no evidence of impacts on wildlife. The Water Company has a consultative committee which addresses conservation issues at all its sites, and the Abberton Reservoir Committee (involving Essex Wildlife Trust and Natural England) addresses local issues.

**C.81** The Blackwater Estuary is the largest estuary in Essex and is one of the largest estuarine complexes in East Anglia. Its mudflats are fringed by saltmarsh on the upper shores, with shingle, shell banks and offshore islands a feature of the tidal flats. The surrounding terrestrial habitats; the sea wall,

ancient grazing marsh and its associated fleet and ditch systems, plus semi-improved grassland, are of high conservation interest. The diversity of estuarine habitats results in the sites being of importance for a wide range of overwintering waterbirds, including raptors, geese, ducks and waders. The site is also important in summer for breeding terns. Water based recreation and in particular jet skis are identified as one of the site's sensitivities. The main threat to the site is erosion of intertidal habitats due to a combination of sea level rise and isostatic forces operating on the land mass of Great Britain. The situation is worsened with increasing winter storm events, whilst the hard sea walls along this coastline are preventing the saltmarsh and intertidal areas from migrating inland. This situation is starting to be addressed by alternative flood defence techniques. A shoreline management plan has been prepared for the Essex coast which seeks to provide a blueprint for managing the coastline sustainably.

**C.82** The Colne Estuary is in the southern end of Colchester's coastal area. It is a comparatively short and branching estuary, with five tidal arms that flow into the main channel of the River Colne. The Colne Estuary encompasses a diversity of soft coastal habitats, dependent upon natural coastal processes. The vulnerability of these habitats is linked to changes in the physical environment: the intertidal zone is threatened by coastal squeeze and changes to the sediment budget, especially up drift of the site. Limited beach feeding is under way to alleviate the sediment problem. The site is vulnerable to recreational pressures which can lead to habitat damage (saltmarsh and sand dunes) and to disturbance of feeding and roosting waterfowl. Pressures for increased use and development of recreational facilities are being addressed through the planning system and under the provisions of the Habitat Regulations. Jet and water-skiing are largely contained by the Harbour Authorities. Most grazing marshes are managed under ESA/ Countryside Stewardship Agreements, but low water levels are of great concern, and low freshwater flows into the estuary, may be affecting bird numbers and/or distribution. This is being addressed through reviews of consents under the Habitats Regulations.

**C.83** In December 2013 the Blackwater, Crouch, Roach and Colne Estuaries Marine Conservation Zone was designated. Marine Conservation Zones (MCZs) are designated marine areas to protect species and habitats found

within them from the most damaging and degrading of activities, taking into account local needs. The Blackwater, Crouch, Roach and Colne Estuaries MCZ has been designated specifically for four features: to maintain in favourable condition ‘intertidal mixed sediments’ and ‘Clacton Cliffs and Foreshore’ and to recover to favourable condition the ‘Native Oyster’ and the ‘Native Oyster beds’.

**C.84** In 2020, the Council along with 11 Essex Council partners, adopted the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) Strategy Document [\[See reference 238\]](#) and SPD [\[See reference 239\]](#). The need for the Essex coast RAMS was identified at an early stage in the iterative HRA process for the Section 1 and Section 2 Colchester Local Plan. Further consideration was given to this at the appropriate assessment stage, partly to reflect that mitigation measures must be considered at the appropriate assessment stage and also as examples of mitigation strategies elsewhere have continued to emerge and the conservation community continue to share good practice. Natural England initiated and were involved in the preparation of the Essex Coast RAMS. The Essex Coast RAMS has the brand name, Bird Aware Essex Coast, which uses the same branding as the well-established Bird Aware Solent.

**C.85** There is one National Nature Reserve (Colne Estuary NNR) and nine Sites of Special Scientific Interest (SSSIs) notified in Colchester, see condition summary table.

**Table C.2: SSSI condition**

| SSSI                | Condition                                                                                      |
|---------------------|------------------------------------------------------------------------------------------------|
| Marks Tey Brickpit  | 100% favourable condition                                                                      |
| Upper Colne Marshes | 100% unfavourable recovering                                                                   |
| Roman River         | 83% favourable condition, 17% unfavourable - declining                                         |
| Abberton Reservoir  | 91% favourable condition, 9% unfavourable - declining                                          |
| Blackwater Estuary  | 31% unfavourable recovering; 57% favourable; 4% unfavourable declining, 8% partially destroyed |

| SSSI                | Condition                      |
|---------------------|--------------------------------|
| Tiptree Heath       | 100% unfavourable, recovering  |
| Bullock Wood        | 100% favourable condition      |
| Cattawade Marshes   | 100% unfavourable - recovering |
| Wivenhoe Gravel Pit | 100% unfavourable - declining  |

**C.86** These are nationally important ecological/geological sites designated under the Wildlife & Countryside Act 1981 with further protection provided through the Countryside & Rights of Ways Act 2000.

**C.87** There are 59 LoWS designated within the city boundary, and six of the eight of the LNRs (excluding Bull Meadows and Tiptree Parish Field) [\[See reference 240\]](#). The 2025 LoWS review proposed extensions to the boundaries of eight LoWS sites:

- Gosbecks's Park
- Hythe Lagoons
- Seven Star Green
- Birch Brook Wood
- Middlewick Ranges
- Pits Wood
- Cymbeline Meadows
- Wivenhoe Park

**C.88** The eight Local Nature Reserves include:

- Welsh Wood LNR
- Bull Meadows LNR
- Hilly Fields LNR
- Spring Lane Meadows LNR
- Lexden Park LNR

- Colne LNR
- Tiptree Parish Field LNR and
- Salary Brook LNR

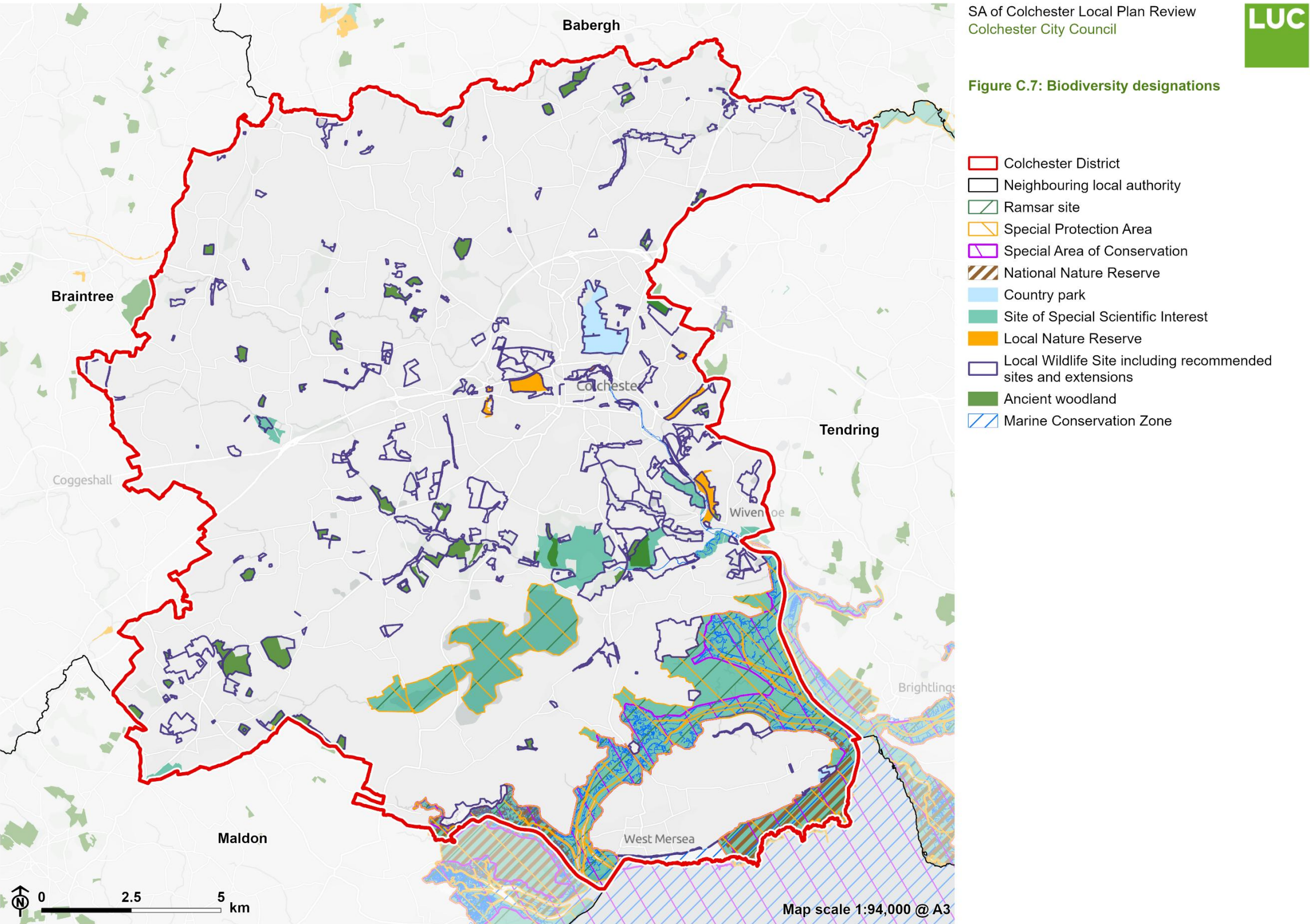
**C.89** These are non-statutory nature conservation sites, which along with the statutory sites, play a key role in helping conserve the City's biodiversity in both urban and rural locations.

**C.90** Introduced in the Environment Act 2021, the Local Nature Recovery Strategy (LNRS) is a statutory requirement. It is part of the wider Nature Recovery Network (NRN), made up of 48 Local Nature Recovery Strategies. Greater Essex is one of the 48 regions across England creating an LNRS. Essex County Council (ECC) is the Responsible Authority appointed to deliver the LNRS for this location. ECC consulted upon the draft LNRS from August 2024 [\[See reference 241\]](#), of which the adopted version was published in July 2025.

**C.91** The adopted LNRS identifies locations to create or improve habitat which is most likely to provide the greatest benefit for nature and the wider environment. It also proposes actions to connect and expand existing spaces for nature. This drives a range of benefits including, but not limited to:

- carbon capture
- absorption of water to reduce flooding
- protection soil of quality and agricultural production
- provision of spaces for nature and wildlife
- improved water quality
- enhanced aesthetic, recreational and economic value of green spaces
- climate change mitigation
- greater opportunities to support mental and physical health

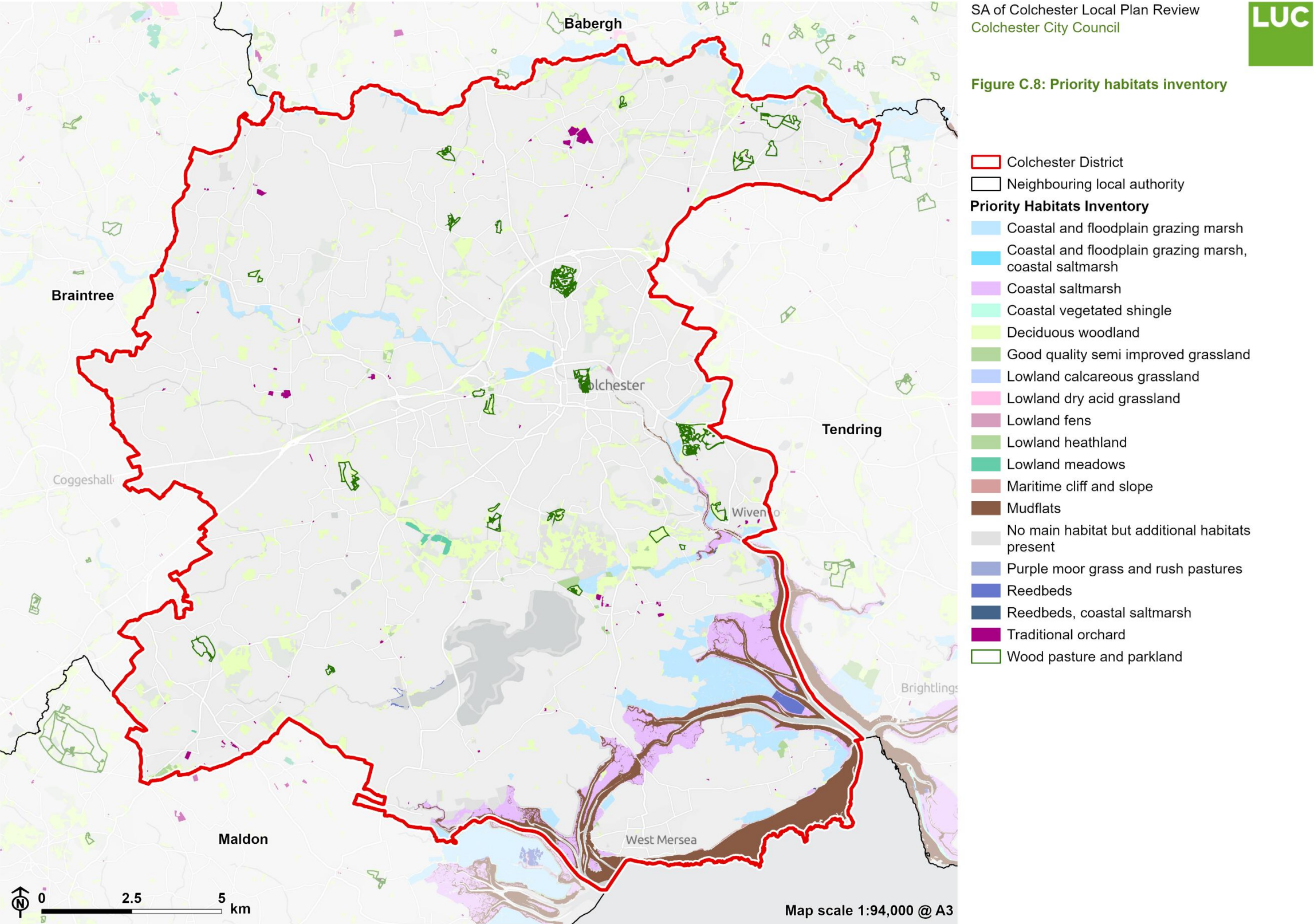
Figure C.7: Biodiversity Designations



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Figure C.8: Priority Habitats Inventory



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# Historic Environment

## Heritage Assets

**C.92** Colchester has a rich and diverse heritage. As Camulodunum, it was the first capital of England and it is also Britain's oldest recorded town; recorded by Pliny the Elder in AD77. The City has a rich archaeological and cultural heritage, dating back to at least 4000BC. Colchester boasts some 1,560 listed buildings and 4 Scheduled Monuments. There are 24 Conservation Areas within the City and three Registered Parks and Gardens. These include Castle Park, Layer Marney Tower Gardens and Wivenhoe Park. The Council has also recently updated the Colchester City Local List which includes 715 buildings or assets that are of historical or architectural interest [\[See reference 242\]](#). In 2023 there were 68 listed buildings on the Essex Heritage at Risk Register. Historic England's Heritage at Risk Register contains nine entries for Colchester [\[See reference 243\]](#) (see table below).

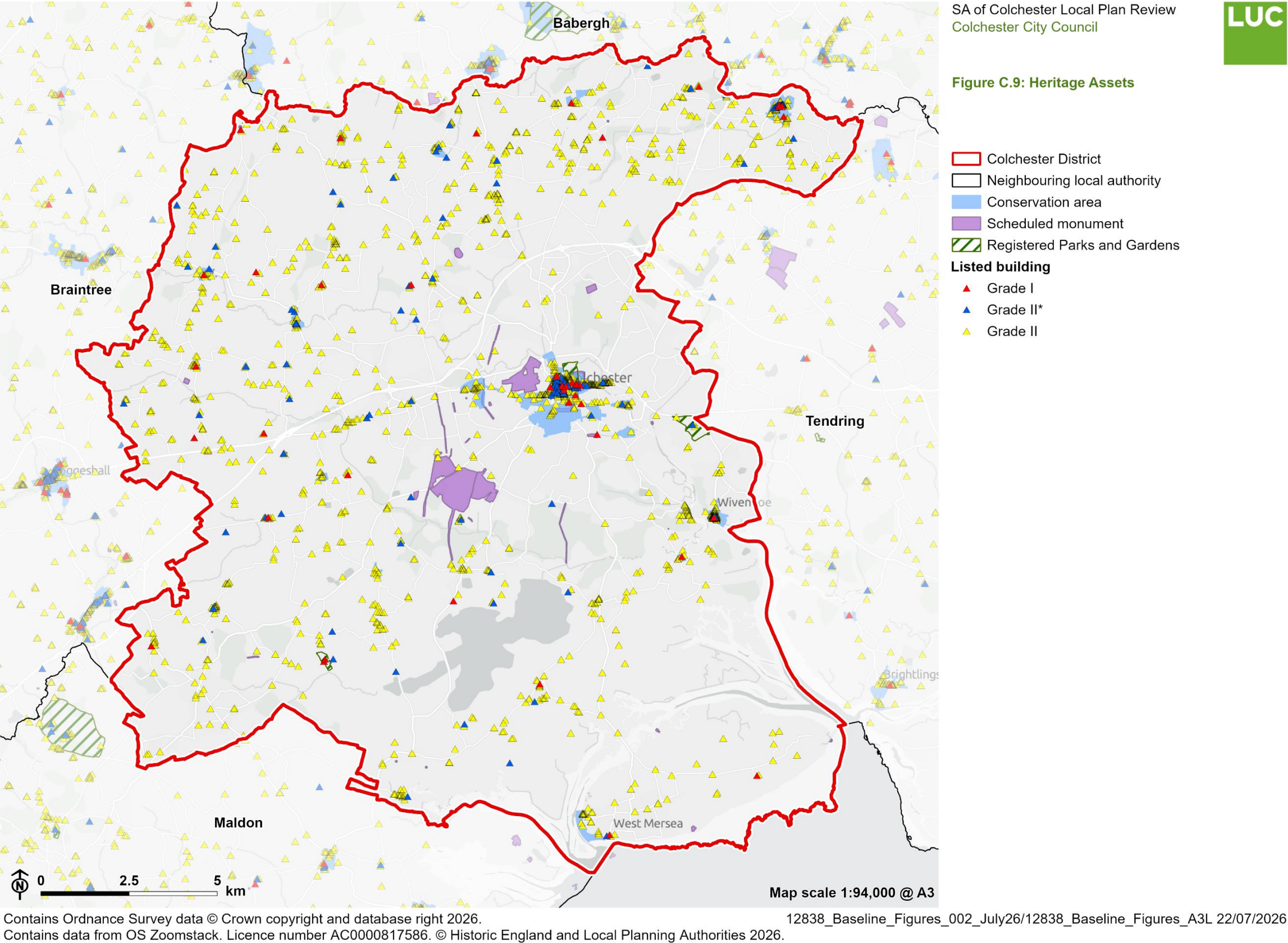
**Table C.3: Heritage at Risk in Colchester**

| Entry Name                              | Heritage Category  | Condition                                              | Principal Vulnerability               | Trend         |
|-----------------------------------------|--------------------|--------------------------------------------------------|---------------------------------------|---------------|
| Birch                                   | Conservation Area  | Poor                                                   | High                                  | Deteriorating |
| Remains of St Mary the Virgin's Church  | Scheduled Monument | Generally unsatisfactory with major localised problems | Deterioration - in need of management | Declining     |
| Roman villa 450m south of Warren's Farm | Scheduled Monument | Extensive significant problems                         | Arable ploughing                      | Declining     |
| Ruins of St Mary's Church,              | Scheduled Monument | Very bad                                               |                                       |               |

## Appendix C Baseline Information

| Entry Name                                                | Heritage Category         | Condition                                                      | Principal Vulnerability             | Trend     |
|-----------------------------------------------------------|---------------------------|----------------------------------------------------------------|-------------------------------------|-----------|
| North of Birch Hall                                       |                           |                                                                |                                     |           |
| Municipal Water Tower (Jumbo)                             | Listed Building grade II* | Very bad                                                       |                                     |           |
| Barn south of Marks Tey Hall                              | Listed Building grade II* | Poor                                                           |                                     |           |
| Colchester Castle and the Temple of Claudius              | Scheduled Monument        | Generally satisfactory but with significant localised problems | Visitor erosion – limited/localised | Declining |
| Tudor Blockhouse 300mm south of Mersea Stone, East Mersea | Scheduled Monument        | Extensive significant problems                                 | Coastal erosion                     | Declining |
| Former Church of Holy Trinity, Trinity Street             | Listed Building Grade I   | Poor                                                           |                                     |           |

Figure C.9: Heritage Assets



## History and Archaeology

**C.93** Colchester was Britain's first city and there is a wealth of heritage assets across the district, including monuments, events, scheduled monuments, listed buildings, conservation areas, Registered Parks and Gardens and a local list. The Colchester Heritage Explorer [\[See reference 244\]](#) includes over 10,000 records.

**C.94** In 2022, Colchester was granted city status as part of the Queen's Platinum Jubilee Celebrations. The Council was formally presented with Letters Patent which officially marked Colchester becoming a city on 23 November 2022. There will be many benefits to Colchester becoming a city, some of these include:

- Attracting more visitors, which in turn, means more people spending money in our shops, businesses, attractions, restaurants, cafes and bars.
- Attracting businesses to make Colchester their home, increasing economic investment and creating new jobs.
- Likely to create greater levels of investment and funding opportunities for key projects.
- Gaining a stronger voice in shaping both the local, regional, and national agenda to get more of what Colchester deserves and to support the delivery of residents' priorities.

## Landscape

**C.95** The rural landscape of the City has a rich ecological character influenced by geology and landform. Habitats include woodland, grassland, heath, estuary, saltmarsh, mudflat, and freshwater as well as open water habitats. Many sites are recognised for their value by international and national notifications, including the coastal and estuary areas in the southeast and the Dedham Vale National Landscape [formerly Area of Outstanding Natural Beauty (AONB)] in the north of the City.

**C.96** The Dedham Vale National Landscape covers the lower part of the Stour Valley on the Essex/Suffolk border. At its heart is an area known as Constable Country centred on the villages of East Bergholt, Flatford, and Dedham which Constable painted two centuries ago. His scenes of a working landscape strongly influenced the designation of the area that has come to represent the epitome of lowland English countryside.

**C.97** The National Landscape stands apart from other lowland river valleys because of its association with Constable and the assemblage of features he painted that can still be seen today. These features include a meandering river and its tributaries; gentle valley slopes with scattered woodlands; grazing and water meadows; sunken rural lanes; historic villages with imposing church towers and historic timber framed buildings; small fields enclosed by ancient hedgerows and a wealth of evidence of human settlement over millennia. Despite intrusions of human activity in the 20th and 21st centuries, the area retains a sense of tranquillity in terms of minimal noise, light and development intrusion.

**C.98** Colchester lies within four National Character Areas (NCAs) [\[See reference 245\]](#) including: South Suffolk and North Essex Clayland NCA; Northern Thames Basin NCA; Essex Haven Gateway; and, Greater Thames Estuary. The Colchester Landscape Character Assessment [\[See reference 246\]](#) identified seven Landscape Character Types in the City: River Valley; Farmland Plateau; Estuarine Marsh/Mudflats; Drained Estuarine Marsh; Coastal Farmland; and, Wooded Farmland.

**C.99** The Council commissioned landscape assessment and sensitivity work to support preparation of the new Local Plan in autumn/winter 2024. This subdivided the City into six landscape character types:

- River Valley;
- Farmland Plateau;
- Estuarine Marsh/Mudflats;
- Drained Estuarine Marsh;

## Appendix C Baseline Information

- Coastal Farmland; and
- Wooded Farmland.

**C.100** Each of these landscape types were subdivided into several landscape character areas. All landscape character areas were subsequently assessed in terms of their inherent value and sensitivity [\[See reference 247\]](#).

## Appendix D

### Site Assessment Criteria

#### Residential site assessment criteria and assumptions

SA Objective 1. Provide a sufficient level of housing to meet the objectively assessed needs of the city to enable people to live in a decent, safe, and sustainable home which is affordable

#### Significance scoring

Scoring of significance will match the major, minor and negligible effects:

- Minor positive +
- Major positive ++
- All other 0

**Table D.1: Site Assessment criteria for SA Objective 1**

| Criterion            | Major positive (++)                                                        | Minor positive (+)                                        | Negligible (0) | Minor negative (-) | Major negative (--) | Data                                                                               |
|----------------------|----------------------------------------------------------------------------|-----------------------------------------------------------|----------------|--------------------|---------------------|------------------------------------------------------------------------------------|
| 1a Housing provision | Significantly contributes to the delivery of housing: $\geq 100$ dwellings | Contributes to the delivery of housing: $< 100$ dwellings | N/A            | N/A                | N/A                 | Based on estimated site capacity and expected density of 30 dwellings per hectare. |

## SA Objective 2. Support the efficient use of land

### Significance scoring

If criterion 2a is a major positive then site scores significant positive, irrespective of criterion 2b.

If criterion 2a is not major positive, then criteria 2a to 2b are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**Table D.2: Site Assessment criteria for SA Objective 2**

| Criterion                                    | Major positive (++)                             | Minor positive (+) | Negligible (0)  | Minor negative (-)                                                                                                                       | Major negative (--)                                                       | Data                                             |
|----------------------------------------------|-------------------------------------------------|--------------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|--------------------------------------------------|
| 2a<br>Brownfield/<br>greenfield<br>land      | Majority of site is brownfield land (i.e. >50%) | N/A                | N/A             | N/A                                                                                                                                      | Majority of site is greenfield land (i.e. >50%)                           | Contained within the shapefile for each site     |
| 2b<br>Agricultural<br>Land<br>Classification | N/A                                             | N/A                | All other sites | Greenfield site with >=25% area classed as Grade 3 agricultural land (but not with >=25% area classed as Grade 1 or 2 agricultural land) | Greenfield site with >=25% area classed as Grade 1 or 2 agricultural land | Natural England Agricultural Land Classification |

## SA Objective 3. Achieve a prosperous and sustainable local economy that improves employment and training opportunities and supports the vitality/viability of centres

### Significance scoring

Criteria 3a, 3c, 3d and 3e are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 4). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**Table D.3: Site Assessment criteria for SA Objective 3**

| Criterion                        | Major positive (++)              | Minor positive (+)               | Negligible (0)                   | Minor negative (-)                                                                                                                        | Major negative (--)                                                                                                                    | Data                                                     |
|----------------------------------|----------------------------------|----------------------------------|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|
| 3a Loss of employment land       | N/A                              | N/A                              | All other sites                  | 1.0-24.9% of site is an existing employment area                                                                                          | >=25% of site is an existing employment area or the site is identified as containing an existing employment generating use             | Colchester City Council's employment area data           |
| 3b Provision of employment sites | N/A for residential site options | N/A for residential site options | N/A for residential site options | N/A for residential site options                                                                                                          | N/A for residential site options                                                                                                       | N/A                                                      |
| 3c Employment deprivation        | N/A                              | N/A                              | All other sites                  | >=25% of site located within one of the 20-40% most deprived areas nationally ('Employment' domain of the Index of Multiple Deprivation). | >=25% of site located within one of the 20% most deprived areas nationally ('Employment' domain of the Index of Multiple Deprivation). | 'Employment' domain of the Index of Multiple Deprivation |

## Appendix D Site Assessment Criteria

| Criterion                             | Major positive (++)                                                           | Minor positive (+)                                                                     | Negligible (0)                                                                         | Minor negative (-)                                                                       | Major negative (--)                                                                     | Data                                                                                                                             |
|---------------------------------------|-------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| 3d Access to jobs [See reference 248] | Site located in LSOA that is in top 20% of LSOAs in district for jobs density | Site located in LSOA that is in 20-40 percentile of LSOAs in district for jobs density | Site located in LSOA that is in 40-60 percentile of LSOAs in district for jobs density | Site located in LSOA that is in 60-80 percentile of LSOAs in district for jobs density   | Site located in LSOA that is in 80-100 percentile of LSOAs in district for jobs density | Nomis Business Register and Employment Survey; Office for National Statistics Lower layer Super Output Area population estimates |
| 3e Town centres                       | <=400m from town centre OR <=200m from district centre                        | 401-800m from town centre OR 201-400m from district centre                             | N/A                                                                                    | 801-1,200m from town centre OR 401-800m from district centre OR <=400m from local centre | >1,200m from town centre AND >800m from district centre AND >400m from local centre     | Colchester City Council town centre boundaries                                                                                   |

## SA Objective 4. Reduce the need to travel and promote sustainable and active transport options to reduce congestion

### Significance scoring

Criteria 4a to 4c are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**Table D.4: Site Assessment criteria for SA Objective 4**

| Criterion  | Major positive (++)            | Minor positive (+)                | Negligible (0) | Minor negative (-)                  | Major negative (--)                                                   | Data                                                   |
|------------|--------------------------------|-----------------------------------|----------------|-------------------------------------|-----------------------------------------------------------------------|--------------------------------------------------------|
| 4a Rail    | <= 500m from a railway station | 501-1,000m from a railway station | N/A            | 1,001-2,000m from a railway station | >2,000m from a railway station or the site contains a railway station | Ordnance Survey railway station data                   |
| 4b Bus     | <= 300m from a bus stop        | 301-600m from a bus stop          | N/A            | 601-1,000m from a bus stop          | >1,000m from a bus stop                                               | National Public Transport Access Nodes bus stop data   |
| 4c Cycling | <= 200m from a cycle route     | 201-400m from a cycle route       | N/A            | 401-800m from a cycle route         | >800m from a cycle route                                              | Local cycle routes; National and Regional Cycle Routes |

## SA Objective 5. Promote stronger, more resilient, inclusive communities; improve health and wellbeing; and reduce levels of deprivation

### Significance scoring

Criteria 5a to 5g are scored:

- Major positive +3
- Minor positive +1
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 7). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**Table D.5: Site Assessment criteria for SA Objective 5**

| Criterion                           | Major positive (++)                                                                         | Minor positive (+)                                                                            | Negligible (0)  | Minor negative (-)                                                                                 | Major negative (--)                                                                              | Data                                                                                                                                                  |
|-------------------------------------|---------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|-----------------|----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5a Open space, sport and recreation | <=300m from open space, sport, recreation facility, open country and registered common land | 301-800m from open space, sport, recreation facility, open country and registered common land | N/A             | 801-1,200m from open space, sport and recreation facility                                          | >1,200m from open space, sport and recreation facility                                           | Colchester City Council open space, sport and recreation facility data; National Trust Open Country data; Natural England Registered Common Land data |
| 5b Loss of open space               | N/A                                                                                         | N/A                                                                                           | All other sites | 1-24.9% of site is open space, sport, recreation facility, open country and registered common land | >=25% of site is open space, sport, recreation facility, open country and registered common land | Colchester City Council open space, sport and recreation facility data; National Trust Open Country data; Natural England Registered Common Land data |
| 5c Public Rights of Way (PRoW)      | <=200m from PRoW                                                                            | 201-400m from PRoW                                                                            | N/A             | 401-800m from PRoW                                                                                 | >800m from PRoW                                                                                  | Colchester City Council PRoW data                                                                                                                     |

## Appendix D Site Assessment Criteria

| Criterion                                  | Major positive (++)                                                        | Minor positive (+)                                                         | Negligible (0)   | Minor negative (-)                                              | Major negative (--)                                                        | Data                                    |
|--------------------------------------------|----------------------------------------------------------------------------|----------------------------------------------------------------------------|------------------|-----------------------------------------------------------------|----------------------------------------------------------------------------|-----------------------------------------|
| 5d GP surgeries                            | <=400m from nearest NHS GP surgery                                         | 401-800m from nearest NHS GP surgery                                       | N/A              | 801-1,200m from nearest NHS GP surgery                          | >1,200m from nearest NHS GP surgery or the site contains an NHS GP surgery | Colchester City Council GP surgery data |
| 5e Levels of deprivation                   | >=25% of site located within one of the 10% most deprived areas nationally | >=25% of site located within one of the 20% most deprived areas nationally | All other sites  | N/A                                                             | N/A                                                                        | Index of Multiple Deprivation           |
| 5f Noise pollution from roads and railways | N/A                                                                        | N/A                                                                        | All other sites. | >=25% site within: Lnight 50.0-54.9 dB, or Laeq,16 55.0-59.9 dB | >=25% site within: Lnight >=55.0 dB, or Laeq,16 >= 60.0 dB                 | Defra road and rail noise data          |

## Appendix D Site Assessment Criteria

| Criterion | Major positive (++) | Minor positive (+) | Negligible (0)   | Minor negative (-) | Major negative (--)                                                                                                                                                                               | Data                                                                                                                                                                                                                        |
|-----------|---------------------|--------------------|------------------|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5g Odour  | N/A                 | N/A                | All other sites. | N/A                | Site is <=400m from a wastewater treatment works, <=500m from an anaerobic digestion facility OR <= 250m from a Site Safeguard Area of a waste management facility or a waste management facility | Environment Agency wastewater treatment plant data and anaerobic digestion facilities data; Colchester City Council waste management facilities; Colchester City Council Site Safeguard Area of a waste management facility |

## SA Objective 6. Provide access to services, facilities and education

### Significance scoring

Each criterion 6a to 6c is scored:

- Major positive +3
- Minor positive +1
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**Table D.6: Site Assessment criteria for SA Objective 6**

| Criterion            | Major positive (++)                                    | Minor positive (+)                                         | Negligible (0) | Minor negative (-)                                                                       | Major negative (--)                                                                 | Data                                          |
|----------------------|--------------------------------------------------------|------------------------------------------------------------|----------------|------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|-----------------------------------------------|
| 6a Town centres      | <=400m from town centre OR <=200m from district centre | 401-800m from town centre OR 201-400m from district centre | N/A            | 801-1,200m from town centre OR 401-800m from district centre OR <=400m from local centre | >1,200m from town centre AND >800m from district centre AND >400m from local centre | Colchester City Council town centre data      |
| 6b Primary schools   | <=400m from primary school                             | 401-800m from primary school                               | N/A            | 801-1,200m from primary school                                                           | >1,200m from primary school or the site contains a primary school                   | Colchester City Council primary school data   |
| 6c Secondary schools | <=500m from secondary school                           | 501-1,000m from secondary school                           | N/A            | 1,001-2,000m from secondary school                                                       | >2,000m from secondary school or the site contains a secondary school               | Colchester City Council secondary school data |

## SA Objective 7. Conserve and enhance the townscape character, and heritage and cultural assets

### Significance scoring

If either of the criteria receive a major negative score then the effect recorded is significant negative.

If both criteria receive a minor negative score then the effect recorded is significant negative.

If only one of criteria receive a minor negative score then the effect recorded is minor negative.

For all other sites the score is negligible.

However, all effects to acknowledge uncertainty in the absence of a heritage impact assessment.

**Table D.7: Site Assessment criteria for SA Objective 7**

| Criterion                                                              | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-) | Major negative (--) | Data                                                                                                                                                                                                                               |
|------------------------------------------------------------------------|---------------------|--------------------|-----------------|--------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7a Proximity to historic assets: sites within existing settlements, or | N/A                 | N/A                | All other sites | 101-250m           | <=100m              | Colchester City Council settlement boundaries; Colchester City Council/Historic England Conservation Areas; Historic England Listed Buildings; Historic England Scheduled Monuments; Historic England Registered Parks and Gardens |

## Appendix D Site Assessment Criteria

| Criterion                                                              | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-) | Major negative (--) | Data                                                                                                                                                                                                                               |
|------------------------------------------------------------------------|---------------------|--------------------|-----------------|--------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7b Proximity to historic assets: sites outside of existing settlements | N/A                 | N/A                | All other sites | 501-1,000m         | <=500m              | Colchester City Council settlement boundaries; Colchester City Council/Historic England Conservation Areas; Historic England Listed Buildings; Historic England Scheduled Monuments; Historic England Registered Parks and Gardens |

## SA Objective 8. Protect, conserve, and enhance biodiversity and promote and conserve geodiversity

### Significance scoring

If either of the criteria receive a major negative score then the effect recorded is significant negative.

If both criteria receive a minor negative score then the effect recorded is significant negative.

If only one of criteria receive a minor negative score then the effect recorded is minor negative.

For all other sites the score is negligible.

**Table D.8: Site Assessment criteria for SA Objective 8**

| Criterion                                                                             | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-)                                           | Major negative (--)                                                           | Data                                                                                                                                  |
|---------------------------------------------------------------------------------------|---------------------|--------------------|-----------------|--------------------------------------------------------------|-------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| 8a International and national biodiversity and geodiversity assets                    | N/A                 | N/A                | All other sites | <=1km from an internationally or nationally designated site  | <=250m from an internationally or nationally designated site                  | Natural England SSSI, Ramsar, SAC, SPA, NNR                                                                                           |
| 8b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland | N/A                 | N/A                | All other sites | <=250m from a LWS, LNR, Priority Habitat or Ancient Woodland | >=1% of site intersects with a LWS, LNR, Priority Habitat or Ancient Woodland | Local Wildlife Sites (LWS); Local Nature Reserves (LNR); Natural England Priority Habitat Inventory; Natural England Ancient Woodland |

## SA Objective 9. Conserve and enhance the character and distinctiveness of the landscape

### Significance scoring

Scoring of significance will match the major, minor and negligible effects:

- Major negative --?
- Minor negative -?
- All other 0?

**Table D.9: Site Assessment criteria for SA Objective 9**

| Criterion                 | Major positive (++) | Minor positive (+) | Negligible (0)                                                                                                                                                | Minor negative (-)                                                    | Major negative (--)                                        | Data                                      |
|---------------------------|---------------------|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|------------------------------------------------------------|-------------------------------------------|
| 9a<br>Landscape Character | N/A                 | N/A                | Site within the existing settlement boundaries that is not subject to assessment through the LCA process OR site within LCA with low inherent landscape value | >=25% of site located within LCA with medium inherent landscape value | >=25% of site located within LCA with high landscape value | Landscape Character Assessment (LCA) work |

## SA Objective 10. Minimise greenhouse gas emissions and mitigate and adapt to climate change

### Significance scoring

N/A

**D.1** The extent to which the location of site options would facilitate the use of sustainable modes of transport in place of cars is considered separately under SA objective 4, and the effects of site options on flood risk is considered separately under SA objective 11. The location of development will not otherwise affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan Review and details submitted at the planning application stage for development sites which includes essential infrastructure such as foul drainage. This SA objective is therefore scoped out for the appraisal of site options.

## SA Objective 11. Manage and reduce flood risk from all sources

### Significance scoring

If either criterion 11a or 11b receives a major negative, the SA objective automatically receives a significant negative effect.

If both of these criteria are minor negative, then a significant negative is given.

- If only one criterion of these two scores minor negative and the other scores negligible, then a minor negative is given.

**Table D.10: Site Assessment criteria for SA Objective 11**

| Criterion                    | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-)                                                | Major negative (--)                                              | Data                                                                                                         |
|------------------------------|---------------------|--------------------|-----------------|-------------------------------------------------------------------|------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| 11a Flood zones              | N/A                 | N/A                | All other sites | >=25% site within Flood Zone 2                                    | >=25% site within Flood Zone 3                                   | Environment Agency Flood Zone 3;<br>Environment Agency Flood Zone 2                                          |
| 11b Surface water flood risk | N/A                 | N/A                | All other sites | >=25% on land with a 1 in 100 year risk of surface water flooding | >=25% on land with a 1 in 30 year risk of surface water flooding | Environment Agency 1:30 surface water flooding data;<br>Environment Agency 1:100 surface water flooding data |

## SA Objective 12. Reduce waste generation and increase levels of reuse and recycling

### Significance scoring

N/A

**D.2** The location of sites is not likely to influence sustainable design and construction techniques. This includes the production of waste from the consumption of materials or resources, volumes of waste produced including the generation of hazardous waste, or the construction/demolition waste going to landfill. The location of sites is also not likely to have an effect on the recovery, re-use or recycling of waste materials, or the demand for recycled material.

**D.3** These details will be promoted and secured through the detailed design proposals for each site at the planning application stage and strategic policies. Therefore, this SA objective has been scoped out for the appraisal of site options.

## SA Objective 13. Protect and improve air quality

### Significance scoring

Each criterion 13a to 13d is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 4). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Negligible 0
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**D.4** The site assessment criteria focus on the potential to the potential for development to contribute to traffic within AQMAs, to contribute to air pollution in areas where there are already issues of poor air quality, or to result in new residents being exposed to air pollution.

**D.5** The assessment of site options does not take into account planned measures that will improve future air quality (such as the ban on sale of new petrol and diesel cars in the UK from 2035), or site-specific mitigation. The

effect of the Plan as a whole on air quality will be assessed elsewhere, within the cumulative effects section of the SA.

**D.6** In 2021, the WHO updated its recommended guidelines for air pollutants (“WHO global air quality guidelines: particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide” [\[See reference 249\]](#)). The new air quality guidelines reflect the best available health evidence and WHO’s recommendations continue to be recognised globally as the targets that should be met to protect public health. Minor negative effects are assumed to occur when residential development would occur in a location where the current baseline annual mean concentration of a pollutant exceeds these 2021 WHO guidelines. Major negative effects are assumed to occur in locations where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK’s national air quality objectives [\[See reference 250\]](#).

**Table D.11: Site Assessment criteria for SA Objective 13**

| Criterion           | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-)                                       | Major negative (--)                                    | Data                       |
|---------------------|---------------------|--------------------|-----------------|----------------------------------------------------------|--------------------------------------------------------|----------------------------|
| 13a Air quality     | N/A                 | N/A                | All other sites | N/A                                                      | Site located within or connected to an AQMA            | Defra AQMA mapping         |
| 13b NO2 pollution   | N/A                 | N/A                | All other sites | >=25% of site has pollutant concentration of 10-40 µg/m3 | >=25% of site has pollutant concentration of >40 µg/m3 | Defra NO2 pollution data   |
| 13c PM10 pollution  | N/A                 | N/A                | All other sites | >=25% of site has pollutant concentration of 15-40 µg/m3 | >=25% of site has pollutant concentration of >40 µg/m3 | Defra PM10 pollution data  |
| 13d PM2.5 pollution | N/A                 | N/A                | All other sites | >=25% of site has pollutant concentration of 5-20 µg/m3  | >=25% of site has pollutant concentration of >20 µg/m3 | Defra PM2.5 pollution data |

## SA Objective 14. Protect the quality and quantity of water resources

### Significance scoring

Each criterion 14a and 14b is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Negligible 0
- Minor negative  $<0$  to  $>-2$

**Table D.12: Site Assessment criteria for SA Objective 14**

| Criterion                   | Major positive (++) | Minor positive (+) | Negligible (0)   | Minor negative (-)                                     | Major negative (--)                               | Data                                                                        |
|-----------------------------|---------------------|--------------------|------------------|--------------------------------------------------------|---------------------------------------------------|-----------------------------------------------------------------------------|
| 14a Source Protection Zones | N/A                 | N/A                | All other sites. | >=25% site falls within Source Protection Zone 2 or 3. | >=25% site falls within Source Protection Zone 1. | Environment Agency Source Protection Zone                                   |
| 14b Water quality           | N/A                 | N/A                | All other sites  | Site is within 100m of a watercourse or water body     | Site contains a watercourse or water body         | Ordnance Survey Open Rivers watercourses data; Ordnance Survey water bodies |

## Employment site assessment criteria and assumptions

SA Objective 1. Provide a sufficient level of housing to meet the objectively assessed needs of the city to enable people to live in a decent, safe, and sustainable home which is affordable

Significance scoring

N/A

Table D.13: Site Assessment criteria for SA Objective 1

| Criterion         | Major positive<br>(++) | Minor positive (+) | Negligible (0) | Minor negative (-) | Major negative (--) | Data |
|-------------------|------------------------|--------------------|----------------|--------------------|---------------------|------|
| Housing provision | N/A                    | N/A                | N/A            | N/A                | N/A                 | N/A  |

## SA Objective 2. Support the efficient use of land

### Significance scoring

If criterion 2a is a major positive then site scores significant positive, irrespective of criterion 2b.

If criterion 2a is not major positive, then criteria 2a to 2b are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**Table D.14: Site Assessment criteria for SA Objective 2**

| Criterion                                    | Major positive (++)                             | Minor positive (+) | Negligible (0)   | Minor negative (-)                                                                                                                       | Major negative (--)                                                       | Data |
|----------------------------------------------|-------------------------------------------------|--------------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|------|
| 2a<br>Brownfield/<br>greenfield<br>land      | Majority of site is brownfield land (i.e. >50%) | N/A                | N/A              | N/A                                                                                                                                      | Majority of site is greenfield land (i.e. >50%)                           |      |
| 2b<br>Agricultural<br>Land<br>Classification | N/A                                             | N/A                | All other sites. | Greenfield site with >=25% area classed as Grade 3 agricultural land (but not with >=25% area classed as Grade 1 or 2 agricultural land) | Greenfield site with >=25% area classed as Grade 1 or 2 agricultural land |      |

## SA Objective 3. Achieve a prosperous and sustainable local economy that improves employment and training opportunities and supports the vitality/viability of centres

### Significance scoring

Criteria 3a and 3d not relevant to employment sites.

Each criterion 3b, 3c and 3e is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Negligible 0
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**Table D.15: Site Assessment criteria for SA Objective 3**

| Criterion                                    | Major positive (++)                                                                                                                       | Minor positive (+)                                                                                                                        | Negligible (0)  | Minor negative (-) | Major negative (--) | Data                                                     |
|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--------------------|---------------------|----------------------------------------------------------|
| 3a Loss of employment land                   | N/A                                                                                                                                       | N/A                                                                                                                                       | N/A             | N/A                | N/A                 | N/A                                                      |
| 3b Provision of employment sites             | Sites that are >=3ha                                                                                                                      | Sites that are <3ha                                                                                                                       | N/A             | N/A                | N/A                 | Within the shapefile for the site                        |
| 3c Employment deprivation                    | >=25% of site is located within one of the 20% most deprived areas nationally ('Employment' domain of the Index of Multiple Deprivation). | >=25% of site located within one of the 20-40% most deprived areas nationally ('Employment' domain of the Index of Multiple Deprivation). | All other sites | N/A                | N/A                 | 'Employment' domain of the Index of Multiple Deprivation |
| 3d Access to jobs <b>[See reference 251]</b> | N/A                                                                                                                                       | N/A                                                                                                                                       | N/A             | N/A                | N/A                 | N/A                                                      |

## Appendix D Site Assessment Criteria

| Criterion       | Major positive (++)                                    | Minor positive (+)                                         | Negligible (0) | Minor negative (-)                                                                       | Major negative (--)                                                                 | Data                                     |
|-----------------|--------------------------------------------------------|------------------------------------------------------------|----------------|------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|------------------------------------------|
| 3e Town centres | <=400m from town centre OR <=200m from district centre | 401-800m from town centre OR 201-400m from district centre | N/A            | 801-1,200m from town centre OR 401-800m from district centre OR <=400m from local centre | >1,200m from town centre AND >800m from district centre AND >400m from local centre | Colchester City Council town centre data |

## SA Objective 4. Reduce the need to travel and promote sustainable and active transport options to reduce congestion

### Significance scoring

Each criterion 4a to 4c is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**Table D.16: Site Assessment criteria for SA Objective 4**

| Criterion  | Major positive (++)          | Minor positive (+)              | Negligible (0) | Minor negative (-)                | Major negative (--)                                                 | Data                                                   |
|------------|------------------------------|---------------------------------|----------------|-----------------------------------|---------------------------------------------------------------------|--------------------------------------------------------|
| 4a Rail    | <= 500m of a railway station | 501-1,000m of a railway station | N/A            | 1,001-2,000m of a railway station | >2,000m of a railway station or the site contains a railway station | Ordnance Survey railway station data                   |
| 4b Bus     | <= 300m of a bus stop        | 301-600m of a bus stop          | N/A            | 601-1,000m of a bus stop          | >1,000m of a bus stop                                               | National Public Transport Access Nodes bus stop data   |
| 4c Cycling | <= 200m of a cycle route     | 201-400m of a cycle route       | N/A            | 401-800m of a cycle route         | >800m of a cycle route                                              | Local cycle routes; National and Regional Cycle Routes |

## SA Objective 5. Promote stronger, more resilient, inclusive communities; improve health and wellbeing; and, reduce levels of deprivation

### Significance scoring

Criteria 5f and 5g not relevant to employment sites.

Each criterion 5a, 5b, 5c, 5d and 5e is scored:

- Major positive +3
- Minor positive +1
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 5). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

Table D.17: Site Assessment criteria for SA Objective 5

| Criterion                           | Major positive (++)                                                                         | Minor positive (+)                                                                            | Negligible (0)  | Minor negative (-)                                                                               | Major negative (--)                                                                              | Data                                                                                                                                                  |
|-------------------------------------|---------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|-----------------|--------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5a Open space, sport and recreation | <=300m from open space, sport, recreation facility, open country and registered common land | 301-800m from open space, sport, recreation facility, open country and registered common land | N/A             | 801-1,200m from open space, sport and recreation facility                                        | >1,200m from open space, sport and recreation facility                                           | Colchester City Council open space, sport and recreation facility data; National Trust Open Country data; Natural England Registered Common Land data |
| 5b Loss of open space               | N/A                                                                                         | N/A                                                                                           | All other sites | 1-25% of site is open space, sport, recreation facility, open country and registered common land | >=25% of site is open space, sport, recreation facility, open country and registered common land | Colchester City Council open space, sport and recreation facility data; National Trust Open Country data; Natural England Registered Common Land data |
| 5c Public Rights of Way (PRoW)      | <=200m from PRoW                                                                            | 201-400m from PRoW                                                                            | N/A             | 401-800m from PRoW                                                                               | >800m from PRoW                                                                                  | Colchester City Council Public Rights of Way data                                                                                                     |

## Appendix D Site Assessment Criteria

| Criterion                                  | Major positive (++)                                                        | Minor positive (+)                                                         | Negligible (0)   | Minor negative (-) | Major negative (--)             | Data                                    |
|--------------------------------------------|----------------------------------------------------------------------------|----------------------------------------------------------------------------|------------------|--------------------|---------------------------------|-----------------------------------------|
| 5d GP surgeries                            | N/A                                                                        | N/A                                                                        | All other sites. | N/A                | Site contains an NHS GP surgery | Colchester City Council GP surgery data |
| 5e Levels of deprivation                   | >=25% of site located within one of the 10% most deprived areas nationally | >=25% of site located within one of the 20% most deprived areas nationally | All other sites  | N/A                | N/A                             | Index of Multiple Deprivation           |
| 5f Noise pollution from roads and railways | N/A                                                                        | N/A                                                                        | N/A              | N/A                | N/A                             | N/A                                     |
| 5g Odour                                   | N/A                                                                        | N/A                                                                        | N/A              | N/A                | N/A                             | N/A                                     |

## SA Objective 6. Provide access to services, facilities and education

### Significance scoring

Each criterion 6a, 6b and 6c is scored:

- Major positive +3
- Minor positive +1
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**Table D.18: Site Assessment criteria for SA Objective 6**

| Criterion            | Major positive (++)                                    | Minor positive (+)                                         | Negligible (0)   | Minor negative (-)                                                                       | Major negative (--)                                                                 | Data                                          |
|----------------------|--------------------------------------------------------|------------------------------------------------------------|------------------|------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|-----------------------------------------------|
| 6a Town centres      | <=400m from town centre OR <=200m from district centre | 401-800m from town centre OR 201-400m from district centre | N/A              | 801-1,200m from town centre OR 401-800m from district centre OR <=400m from local centre | >1,200m from town centre AND >800m from district centre AND >400m from local centre | Colchester City Council town centre data      |
| 6b Primary schools   | N/A                                                    | N/A                                                        | All other sites. | N/A                                                                                      | Site contains a primary school                                                      | Colchester City Council primary school data   |
| 6c Secondary schools | N/A                                                    | N/A                                                        | All other sites. | N/A                                                                                      | Site contains a secondary school                                                    | Colchester City Council secondary school data |

## SA Objective 7. Conserve and enhance the townscape character, and heritage and cultural assets

### Significance scoring

If either of the criteria receive a major negative score then the effect recorded is significant negative.

If both criteria receive a minor negative score then the effect recorded is significant negative.

If only one of criteria receive a minor negative score then the effect recorded is minor negative.

For all other sites the score is negligible.

- However, all effects to acknowledge uncertainty in the absence of a heritage impact assessment.

**Table D.19: Site Assessment criteria for SA Objective 7**

| Criterion                                                          | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-) | Major negative (--) | Data                                                                                                                                                                                                                               |
|--------------------------------------------------------------------|---------------------|--------------------|-----------------|--------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7a Proximity to historic assets: sites within existing settlements | N/A                 | N/A                | All other sites | 101-250m           | <=100m              | Colchester City Council Settlement boundaries; Colchester City Council/Historic England Conservation Areas; Historic England Listed Buildings; Historic England Scheduled Monuments; Historic England Registered Parks And Gardens |

## Appendix D Site Assessment Criteria

| Criterion                                                              | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-) | Major negative (--) | Data                                                                                                                                                                                                                               |
|------------------------------------------------------------------------|---------------------|--------------------|-----------------|--------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7b Proximity to historic assets: sites outside of existing settlements | N/A                 | N/A                | All other sites | 501-1,000m         | <=500m              | Colchester City Council Settlement boundaries; Colchester City Council/Historic England Conservation Areas; Historic England Listed Buildings; Historic England Scheduled Monuments; Historic England Registered Parks And Gardens |

## SA Objective 8. Protect, conserve, and enhance biodiversity and promote and conserve geodiversity

### Significance scoring

If either of the criteria receive a major negative score then the effect recorded is significant negative.

If both criteria receive a minor negative score then the effect recorded is significant negative.

If only one of criteria receive a minor negative score then the effect recorded is minor negative.

For all other sites the score is negligible.

**Table D.20: Site Assessment criteria for SA Objective 8**

| Criterion                                                                                       | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-)                                           | Major negative (--)                                                           | Data                                                                                                                                  |
|-------------------------------------------------------------------------------------------------|---------------------|--------------------|-----------------|--------------------------------------------------------------|-------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| 8a International and national biodiversity and geodiversity assets                              | N/A                 | N/A                | All other sites | <=1km from an internationally or nationally designated site  | <=250m from an internationally or nationally designated site                  | Natural England SSSI, Ramsar, SAC, SPA, NNR                                                                                           |
| 8b Local Wildlife Sites, Local Nature Reserves, Priority Habitat Inventory and Ancient Woodland | N/A                 | N/A                | All other sites | <=250m from a LWS, LNR, Priority Habitat or Ancient Woodland | >=1% of site intersects with a LWS, LNR, Priority Habitat or Ancient Woodland | Local Wildlife Sites (LWS); Local Nature Reserves (LNR); Natural England Priority Habitat Inventory; Natural England Ancient Woodland |

## SA Objective 9. Conserve and enhance the character and distinctiveness of the landscape

### Significance scoring

Scoring of significance will match the major, minor and negligible effects:

- Major negative --?
- Minor negative -?
- All other 0?

**Table D.21: Site Assessment criteria for SA Objective 9**

| Criterion                 | Major positive (++) | Minor positive (+) | Negligible (0)                                                                                                                                                   | Minor negative (-)                                                    | Major negative (--)                                        | Data                                      |
|---------------------------|---------------------|--------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|------------------------------------------------------------|-------------------------------------------|
| 9a<br>Landscape Character | N/A                 | N/A                | Site within the existing settlement boundaries that is not subject to assessment through the LCA process OR site is within LCA with low inherent landscape value | >=25% of site located within LCA with medium inherent landscape value | >=25% of site located within LCA with high landscape value | Landscape Character Assessment (LCA) work |

## SA Objective 10. Minimise greenhouse gas emissions and mitigate and adapt to the effects of climate change

### Significance scoring

N/A

**D.7** The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan Review and details submitted at the planning application stage for development sites which includes essential infrastructure such as foul drainage. The extent to which the location of site options would facilitate the use of sustainable modes of transport in place of cars is considered separately under SA objective 4, and the effects of site options on flood risk is considered separately under SA objective 11. The likely effects of all site options on this objective are therefore negligible (0).

## SA Objective 11. Manage and reduce flood risk from all sources

### Significance scoring

If either criterion 11a or 11b receives a major negative, the SA objective automatically receives a significant negative effect.

If both of these criteria are minor negative, then a significant negative is given.

If only one criterion of these two scores minor negative and the other scores negligible, then a minor negative is given.

**Table D.22: Site Assessment criteria for SA Objective 11 M**

| Criterion                    | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-)                                                | Major negative (--)                                              | Data                                                                                                         |
|------------------------------|---------------------|--------------------|-----------------|-------------------------------------------------------------------|------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| 11a Flood zones              | N/A                 | N/A                | All other sites | >=25% site within Flood Zone 2                                    | >=25% site within Flood Zone 3                                   | Environment Agency Flood Zone 3;<br>Environment Agency Flood Zone 2                                          |
| 11b Surface water flood risk | N/A                 | N/A                | All other sites | >=25% on land with a 1 in 100 year risk of surface water flooding | >=25% on land with a 1 in 30 year risk of surface water flooding | Environment Agency 1:30 surface water flooding data;<br>Environment Agency 1:100 surface water flooding data |

## SA Objective 12. Reduce waste generation and increase levels of reuse and recycling

### Significance scoring

N/A

**D.8** The location of sites is not likely to influence sustainable design and construction techniques. This includes the production of waste from the consumption of materials or resources, volumes of waste produced including the generation of hazardous waste, or the construction/demolition waste going to landfill. The location of sites is also not likely to have an effect on the recovery, re-use or recycling of waste materials, or the demand for recycled material.

**D.9** These details will be promoted and secured through the detailed design proposals for each site at the planning application stage and strategic policies. Therefore, this SA objective has been scoped out.

## SA Objective 13. Protect and improve air quality

### Significance scoring

Each criterion 13a to 13d is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 4). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Negligible 0
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**Table D.23: Site Assessment criteria for SA Objective 13**

| Criterion           | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-)                                       | Major negative (--)                                    | Data                       |
|---------------------|---------------------|--------------------|-----------------|----------------------------------------------------------|--------------------------------------------------------|----------------------------|
| 13a Air quality     | N/A                 | N/A                | All other sites | N/A                                                      | Site located within or connected to an AQMA            | Defra AQMA mapping         |
| 13b NO2 pollution   | N/A                 | N/A                | All other sites | >=25% of site has pollutant concentration of 10-40 µg/m3 | >=25% of site has pollutant concentration of >40 µg/m3 | Defra NO2 pollution data   |
| 13c PM10 pollution  | N/A                 | N/A                | All other sites | >=25% of site has pollutant concentration of 15-40 µg/m3 | >=25% of site has pollutant concentration of >40 µg/m3 | Defra PM10 pollution data  |
| 13d PM2.5 pollution | N/A                 | N/A                | All other sites | >=25% of site has pollutant concentration of 5-20 µg/m3  | >=25% of site has pollutant concentration of >20 µg/m3 | Defra PM2.5 pollution data |

## SA Objective 14. Protect the quality and quantity of water resources

### Significance scoring

Each criterion 14a and 14b is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Negligible 0
- Minor negative  $<0$  to  $>-2$

**Table D.24: Site Assessment criteria for SA Objective 14**

| Criterion                   | Major positive (++) | Minor positive (+) | Negligible (0)   | Minor negative (-)                                     | Major negative (--)                               | Data                                                                        |
|-----------------------------|---------------------|--------------------|------------------|--------------------------------------------------------|---------------------------------------------------|-----------------------------------------------------------------------------|
| 14a Source Protection Zones | N/A                 | N/A                | All other sites. | >=25% site falls within Source Protection Zone 2 or 3. | >=25% site falls within Source Protection Zone 1. | Environment Agency Source Protection Zone                                   |
| 14b Water quality           | N/A                 | N/A                | All other sites  | Site is within 100m of a watercourse or water body     | Site contains a watercourse or water body         | Ordnance Survey Open Rivers watercourses data; Ordnance Survey water bodies |

## Residential-led mixed use site assessment criteria and assumptions

SA Objective 1. Provide a sufficient level of housing to meet the objectively assessed needs of the city to enable people to live in a decent, safe, and sustainable home which is affordable

### Significance scoring

Scoring of significance will match the major, minor and negligible effects:

- Minor positive +?
- All other 0?

**Table D.25: Site Assessment criteria for SA Objective 1**

| Criterion            | Major positive (++) | Minor positive (+)                                             | Negligible (0) | Minor negative (-) | Major negative (--) | Data                                                                               |
|----------------------|---------------------|----------------------------------------------------------------|----------------|--------------------|---------------------|------------------------------------------------------------------------------------|
| 1a Housing provision |                     | Contributes to the delivery of housing:<br>[See reference 252] | N/A            | N/A                | N/A                 | Based on estimated site capacity and expected density of 30 dwellings per hectare. |

## SA Objective 2. Support the efficient use of land

### Significance scoring

If criterion 2a is a major positive then site scores significant positive, irrespective of criterion 2b.

If criterion 2a is not major positive, then criteria 2a to 2b are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**Table D.26: Site Assessment criteria for SA Objective 2**

| Criterion                                    | Major positive (++)                             | Minor positive (+) | Negligible (0)  | Minor negative (-)                                                                                                                       | Major negative (--)                                                       | Data                                             |
|----------------------------------------------|-------------------------------------------------|--------------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|--------------------------------------------------|
| 2a<br>Brownfield/<br>greenfield<br>land      | Majority of site is brownfield land (i.e. >50%) | N/A                | N/A             | N/A                                                                                                                                      | Majority of site is greenfield land (i.e. >50%)                           | Contained within the shapefile for each site     |
| 2b<br>Agricultural<br>Land<br>Classification | N/A                                             | N/A                | All other sites | Greenfield site with >=25% area classed as Grade 3 agricultural land (but not with >=25% area classed as Grade 1 or 2 agricultural land) | Greenfield site with >=25% area classed as Grade 1 or 2 agricultural land | Natural England Agricultural Land Classification |

## SA Objective 3. Achieve a prosperous and sustainable local economy that improves employment and training opportunities and supports the vitality/viability of centres

### Significance scoring

Criteria 3a, 3b, 3c, 3d and 3e are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 5). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

All effects to acknowledge uncertainty (?) given that the potential loss of existing employment land and the provision of new employment uses will be dependent upon the specific proposals that come forward at any site allocation and their composition:

### ■ Criterion 3b Provision of employment sites

- All of the mixed use site options are expected to have positive effects on the element of this objective relating to the growth of Colchester's economy, as it is assumed that all mixed use site options will incorporate some element of employment generating uses. Therefore, a minor positive (+) effect is therefore recorded for mixed use site options.

**Table D.27: Site Assessment criteria for SA Objective 3**

| Criterion                  | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-)                                                                                                                        | Major negative (--)                                                                                                                    | Data                                                          |
|----------------------------|---------------------|--------------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
| 3a Loss of employment land | N/A                 | N/A                | All other sites | 1.0-24.9% of site is an existing employment area                                                                                          | >=25% of site is an existing employment area or the site is identified as containing an existing employment generating use             | Colchester City Council's employment area data                |
| 3c Employment deprivation  | N/A                 | N/A                | All other sites | >=25% of site located within one of the 20-40% most deprived areas nationally ('Employment' domain of the Index of Multiple Deprivation). | >=25% of site located within one of the 20% most deprived areas nationally ('Employment' domain of the Index of Multiple Deprivation). | 'Employment' domain of the Index of Multiple Deprivation 2019 |

## Appendix D Site Assessment Criteria

| Criterion                             | Major positive (++)                                                           | Minor positive (+)                                                                     | Negligible (0)                                                                         | Minor negative (-)                                                                       | Major negative (--)                                                                     | Data                                                                                                                             |
|---------------------------------------|-------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| 3d Access to jobs [See reference 253] | Site located in LSOA that is in top 20% of LSOAs in district for jobs density | Site located in LSOA that is in 20-40 percentile of LSOAs in district for jobs density | Site located in LSOA that is in 40-60 percentile of LSOAs in district for jobs density | Site located in LSOA that is in 60-80 percentile of LSOAs in district for jobs density   | Site located in LSOA that is in 80-100 percentile of LSOAs in district for jobs density | Nomis Business Register and Employment Survey; Office for National Statistics Lower layer Super Output Area population estimates |
| 3e Town centres                       | <=400m from town centre OR <=200m from district centre                        | 401-800m from town centre OR 201-400m from district centre                             | N/A                                                                                    | 801-1,200m from town centre OR 401-800m from district centre OR <=400m from local centre | >1,200m from town centre AND >800m from district centre AND >400m from local centre     | Colchester City Council town centre boundaries                                                                                   |

## SA Objective 4. Reduce the need to travel and promote sustainable and active transport options to reduce congestion

### Significance scoring

Criteria 4a to 4c are scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**Table D.28: Site Assessment criteria for SA Objective 4**

| Criterion  | Major positive (++)            | Minor positive (+)                | Negligible (0) | Minor negative (-)                  | Major negative (--)                                                   | Data                                                   |
|------------|--------------------------------|-----------------------------------|----------------|-------------------------------------|-----------------------------------------------------------------------|--------------------------------------------------------|
| 4a Rail    | <= 500m from a railway station | 501-1,000m from a railway station | N/A            | 1,001-2,000m from a railway station | >2,000m from a railway station or the site contains a railway station | Ordnance Survey railway station data                   |
| 4b Bus     | <= 300m from a bus stop        | 301-600m from a bus stop          | N/A            | 601-1,000m from a bus stop          | >1,000m from a bus stop                                               | National Public Transport Access Nodes bus stop data   |
| 4c Cycling | <= 200m from a cycle route     | 201-400m from a cycle route       | N/A            | 401-800m from a cycle route         | >800m from a cycle route                                              | Local cycle routes; National and Regional Cycle Routes |

## SA Objective 5. Promote stronger, more resilient, inclusive communities; improve health and wellbeing; and reduce levels of deprivation

### Significance scoring

Criteria 5a to 5g are scored:

- Major positive +3
- Minor positive +1
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 7). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

Table D.29: Site Assessment criteria for SA Objective 5

| Criterion                           | Major positive (++)                                                                         | Minor positive (+)                                                                            | Negligible (0)  | Minor negative (-)                                                                                 | Major negative (--)                                                                              | Data                                                                                                                                                  |
|-------------------------------------|---------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|-----------------|----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5a Open space, sport and recreation | <=300m from open space, sport, recreation facility, open country and registered common land | 301-800m from open space, sport, recreation facility, open country and registered common land | N/A             | 801-1,200m from open space, sport and recreation facility                                          | >1,200m from open space, sport and recreation facility                                           | Colchester City Council open space, sport and recreation facility data; National Trust Open Country data; Natural England Registered Common Land data |
| 5b Loss of open space               | N/A                                                                                         | N/A                                                                                           | All other sites | 1-24.9% of site is open space, sport, recreation facility, open country and registered common land | >=25% of site is open space, sport, recreation facility, open country and registered common land | Colchester City Council open space data                                                                                                               |
| 5c Public Rights of Way (PRoW)      | <=200m from PRoW                                                                            | 201-400m from PRoW                                                                            | N/A             | 401-800m from PRoW                                                                                 | >800m from PRoW                                                                                  | Colchester City Council PRoW data                                                                                                                     |
| 5d GP surgeries                     | <=400m from nearest NHS GP surgery                                                          | 401-800m from nearest NHS GP surgery                                                          | N/A             | 801-1,200m from nearest NHS GP surgery                                                             | >1,200m from nearest NHS GP surgery or the site contains an NHS GP surgery                       | Colchester City Council GP surgery data                                                                                                               |

## Appendix D Site Assessment Criteria

| Criterion                                  | Major positive (++)                                                        | Minor positive (+)                                                         | Negligible (0)   | Minor negative (-)                                              | Major negative (--)                                                                                                                                                                               | Data                                                                                                                                                                                                                                        |
|--------------------------------------------|----------------------------------------------------------------------------|----------------------------------------------------------------------------|------------------|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5e Levels of deprivation                   | >=25% of site located within one of the 10% most deprived areas nationally | >=25% of site located within one of the 20% most deprived areas nationally | All other sites  | N/A                                                             | N/A                                                                                                                                                                                               | Index of Multiple Deprivation                                                                                                                                                                                                               |
| 5f Noise pollution from roads and railways | N/A                                                                        | N/A                                                                        | All other sites. | >=25% site within: Lnight 50.0-54.9 dB, or Laeq,16 55.0-59.9 dB | >=25% site within: Lnight >=55.0 dB, or Laeq,16 >= 60.0 dB                                                                                                                                        | Defra road and rail noise data                                                                                                                                                                                                              |
| 5g Odour                                   | N/A                                                                        | N/A                                                                        | All other sites. | N/A                                                             | Site is <=400m from a wastewater treatment works, <=500m from an anaerobic digestion facility OR <= 250m from a Site Safeguard Area of a waste management facility or a waste management facility | Environment Agency wastewater treatment plant data; Environment Agency anaerobic digestion facilities data; Colchester City Council waste management facilities; Colchester City Council Site Safeguard Area of a waste management facility |

## SA Objective 6. Provide access to services, facilities and education

### Significance scoring

Each criterion 6a to 6c is scored:

- Major positive +3
- Minor positive +1
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 3). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**Table D.30: Site Assessment criteria for SA Objective 6**

| Criterion            | Major positive (++)                                    | Minor positive (+)                                         | Negligible (0) | Minor negative (-)                                                                       | Major negative (--)                                                                 | Data                                          |
|----------------------|--------------------------------------------------------|------------------------------------------------------------|----------------|------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|-----------------------------------------------|
| 6a Town centres      | <=400m from town centre OR <=200m from district centre | 401-800m from town centre OR 201-400m from district centre | N/A            | 801-1,200m from town centre OR 401-800m from district centre OR <=400m from local centre | >1,200m from town centre AND >800m from district centre AND >400m from local centre | Colchester City Council town centre data      |
| 6b Primary schools   | <=400m from primary school                             | 401-800m from primary school                               | N/A            | 801-1,200m from primary school                                                           | >1,200m from primary school or the site contains a primary school                   | Colchester City Council primary school data   |
| 6c Secondary schools | <=500m from secondary school                           | 501-1,000m from secondary school                           | N/A            | 1,001-2,000m from secondary school                                                       | >2,000m from secondary school or the site contains a secondary school               | Colchester City Council secondary school data |

## SA Objective 7. Conserve and enhance the townscape character, and heritage and cultural assets

### Significance scoring

If either of the criteria receive a major negative score then the effect recorded is significant negative.

If both criteria receive a minor negative score then the effect recorded is significant negative.

If only one of criteria receive a minor negative score then the effect recorded is minor negative.

For all other sites the score is negligible.

- However, all effects to acknowledge uncertainty in the absence of a heritage impact assessment.

**Table D.31: Site Assessment criteria for SA Objective 7**

| Criterion                                                              | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-) | Major negative (--) | Data                                                                                                                                                                                                                               |
|------------------------------------------------------------------------|---------------------|--------------------|-----------------|--------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7a Proximity to historic assets: sites within existing settlements, or | N/A                 | N/A                | All other sites | 101-250m           | <=100m              | Colchester City Council settlement boundaries; Colchester City Council/Historic England Conservation Areas; Historic England Listed Buildings; Historic England Scheduled Monuments; Historic England Registered Parks and Gardens |

## Appendix D Site Assessment Criteria

| Criterion                                                              | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-) | Major negative (--) | Data                                                                                                                                                                                                                               |
|------------------------------------------------------------------------|---------------------|--------------------|-----------------|--------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7b Proximity to historic assets: sites outside of existing settlements | N/A                 | N/A                | All other sites | 501-1,000m         | <=500m              | Colchester City Council settlement boundaries; Colchester City Council/Historic England Conservation Areas; Historic England Listed Buildings; Historic England Scheduled Monuments; Historic England Registered Parks and Gardens |

## SA Objective 8. Protect, conserve, and enhance biodiversity and promote and conserve geodiversity

### Significance scoring

If either of the criteria receive a major negative score then the effect recorded is significant negative.

If both criteria receive a minor negative score then the effect recorded is significant negative.

If only one of criteria receive a minor negative score then the effect recorded is minor negative.

For all other sites the score is negligible.

**Table D.32: Site Assessment criteria for SA Objective 8**

| Criterion                                                                             | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-)                                           | Major negative (--)                                                           | Data                                                                                                                                  |
|---------------------------------------------------------------------------------------|---------------------|--------------------|-----------------|--------------------------------------------------------------|-------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| 8a International and national biodiversity and geodiversity assets                    | N/A                 | N/A                | All other sites | <=1km from an internationally or nationally designated site  | <=250m from an internationally or nationally designated site                  | Natural England SSSI, Ramsar, SAC, SPA, NNR                                                                                           |
| 8b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland | N/A                 | N/A                | All other sites | <=250m from a LWS, LNR, Priority Habitat or Ancient Woodland | >=1% of site intersects with a LWS, LNR, Priority Habitat or Ancient Woodland | Local Wildlife Sites (LWS); Local Nature Reserves (LNR); Natural England Priority Habitat Inventory; Natural England Ancient Woodland |

## SA Objective 9. Conserve and enhance the character and distinctiveness of the landscape

### Significance scoring

Scoring of significance will match the major, minor and negligible effects:

- Major negative --?
- Minor negative -?
- All other 0?

**Table D.33: Site Assessment criteria for SA Objective 9**

| Criterion                    | Major positive (++) | Minor positive (+) | Negligible (0)                                                                                                                                                | Minor negative (-)                                                    | Major negative (--)                                        | Data                                      |
|------------------------------|---------------------|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|------------------------------------------------------------|-------------------------------------------|
| 9a<br>Landscape<br>Character | N/A                 | N/A                | Site within the existing settlement boundaries that is not subject to assessment through the LCA process OR site within LCA with low inherent landscape value | >=25% of site located within LCA with medium inherent landscape value | >=25% of site located within LCA with high landscape value | Landscape Character (LCA) Assessment work |

## SA Objective 10. Minimise greenhouse gas emissions and mitigate and adapt to climate change

### Significance scoring

■ N/A

**D.10** The extent to which the location of site options would facilitate the use of sustainable modes of transport in place of cars is considered separately under SA objective 4, and the effects of site options on flood risk is considered separately under SA objective 11. The location of development will not otherwise affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Local Plan Review and details submitted at the planning application stage for development sites which includes essential infrastructure such as foul drainage. This SA objective is therefore scoped out for the appraisal of site options.

## SA Objective 11. Manage and reduce flood risk from all sources

### Significance scoring

- If either criterion 11a or 11b receives a major negative, the SA objective automatically receives a significant negative effect.
- If both of these criteria are minor negative, then a significant negative is given.
- If only one criterion of these two scores minor negative and the other scores negligible, then a minor negative is given.

**Table D.34: Site Assessment criteria for SA Objective 11**

| Criterion                    | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-)                                                | Major negative (--)                                              | Data                                                                                                         |
|------------------------------|---------------------|--------------------|-----------------|-------------------------------------------------------------------|------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| 11a Flood zones              | N/A                 | N/A                | All other sites | >=25% site within Flood Zone 2                                    | >=25% site within Flood Zone 3                                   | Environment Agency Flood Zone 3;<br>Environment Agency Flood Zone 2                                          |
| 11b Surface water flood risk | N/A                 | N/A                | All other sites | >=25% on land with a 1 in 100 year risk of surface water flooding | >=25% on land with a 1 in 30 year risk of surface water flooding | Environment Agency 1:30 surface water flooding data;<br>Environment Agency 1:100 surface water flooding data |

## SA Objective 12. Reduce waste generation and increase levels of reuse and recycling

### Significance scoring

N/A

**D.11** The location of sites is not likely to influence sustainable design and construction techniques. This includes the production of waste from the consumption of materials or resources, volumes of waste produced including the generation of hazardous waste, or the construction/demolition waste going to landfill. The location of sites is also not likely to have an effect on the recovery, re-use or recycling of waste materials, or the demand for recycled material.

**D.12** These details will be promoted and secured through the detailed design proposals for each site at the planning application stage and strategic policies. Therefore, this SA objective has been scoped out for the appraisal of site options.

## SA Objective 13. Protect and improve air quality

### Significance scoring

Each criterion 13a to 13d is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 4). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Negligible 0
- Minor negative  $<0$  to  $>-2$
- Significant negative  $\leq -2$

**D.13** The site assessment criteria focus on the potential to the potential for development to contribute to traffic within AQMAs, to contribute to air pollution in areas where there are already issues of poor air quality, or to result in new residents being exposed to air pollution.

**D.14** The assessment of site options does not take into account planned measures that will improve future air quality (such as the ban on sale of new petrol and diesel cars in the UK from 2035), or site-specific mitigation. The

effect of the Plan as a whole on air quality will be assessed elsewhere, within the cumulative effects section of the SA.

**D.15** In 2021, the WHO updated its recommended guidelines for air pollutants (“WHO global air quality guidelines: particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide” [\[See reference 254\]](#)). The new air quality guidelines reflect the best available health evidence and WHO’s recommendations continue to be recognised globally as the targets that should be met to protect public health. Minor negative effects are assumed to occur when residential development would occur in a location where the current baseline annual mean concentration of a pollutant exceeds these 2021 WHO guidelines. Major negative effects are assumed to occur in locations where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK’s national air quality objectives [\[See reference 255\]](#).

**Table D.35: Site Assessment criteria for SA Objective 13**

| Criterion           | Major positive (++) | Minor positive (+) | Negligible (0)  | Minor negative (-)                                       | Major negative (--)                                    | Data                                        |
|---------------------|---------------------|--------------------|-----------------|----------------------------------------------------------|--------------------------------------------------------|---------------------------------------------|
| 13a Air quality     | N/A                 | N/A                | N/A             | All other sites                                          | N/A                                                    | Site located within or connected to an AQMA |
| 13b NO2 pollution   | N/A                 | N/A                | All other sites | >=25% of site has pollutant concentration of 10-40 µg/m3 | >=25% of site has pollutant concentration of >40 µg/m3 | Defra NO2 pollution data                    |
| 13c PM10 pollution  | N/A                 | N/A                | All other sites | >=25% of site has pollutant concentration of 15-40 µg/m3 | >=25% of site has pollutant concentration of >40 µg/m3 | Defra PM10 pollution data                   |
| 13d PM2.5 pollution | N/A                 | N/A                | All other sites | >=25% of site has pollutant concentration of 5-20 µg/m3  | >=25% of site has pollutant concentration of >20 µg/m3 | Defra PM2.5 pollution data                  |

## SA Objective 14. Protect the quality and quantity of water resources

### Significance scoring

Each criterion 14a and 14b is scored:

- Major positive +3
- Minor positive +1
- Negligible 0
- Minor negative -1
- Major negative -3

Scores totalled, and then averaged (i.e. total score divided by 2). Overall significance is scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Negligible 0
- Minor negative  $<0$  to  $>-2$

**Table D.36: Site Assessment criteria for SA Objective 14**

| Criterion                   | Major positive (++) | Minor positive (+) | Negligible (0)   | Minor negative (-)                                     | Major negative (--)                               | Data                                                                        |
|-----------------------------|---------------------|--------------------|------------------|--------------------------------------------------------|---------------------------------------------------|-----------------------------------------------------------------------------|
| 14a Source Protection Zones | N/A                 | N/A                | All other sites. | >=25% site falls within Source Protection Zone 2 or 3. | >=25% site falls within Source Protection Zone 1. | Environment Agency Source Protection Zone                                   |
| 14b Water quality           | N/A                 | N/A                | All other sites  | Site is within 100m of a watercourse or water body     | Site contains a watercourse or water body         | Ordnance Survey Open Rivers watercourses data; Ordnance Survey water bodies |

## Appendix E

# Audit trail of decision making for site options considered for the Submission Draft Local Plan

**E.1** Information about the Council's decision making regarding which site options to allocate in the Submission Draft Local Plan is set out below. For each option, the reasons for its selection or rejection for inclusion in the Submission Draft Local Plan are set out.

**E.2** Please note that some of the site options that are proposed for allocation or safeguarding in the Local Plan or considered as part of this process were amended following their initial appraisal through the SA process in September 2024. Where this is the case, this is shown in the column that indicates whether or not the site is included in the Submission Draft Local Plan. Where a site option is included in the Local Plan, this column also sets out the reference of the relevant policy in brackets.

**Table E.1: Audit trail table of decision making for site options considered for the Submission Draft Local Plan**

| Site ref | Site name                                      | Settlement          | Proposed use | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------|------------------------------------------------|---------------------|--------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10082    | North Station Car Park                         | Colchester          | Residential  | Yes - as PP6                        | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable. The site performs positively in the Sustainability Appraisal, particularly in relation to re-using previously developed land, accessibility to services, public transport provision and access to employment opportunities, reflecting the site's sustainable location. The site supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 10090    | Land North West of Fiddlers Wood Halstead Road | Eight Ash Green     | Residential  | Yes – as PP32                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations. The site is adjacent to the neighbourhood plan allocation currently under construction and has planning consent. Constraints related to biodiversity harm due to increased recreational disturbance to the adjacent LoWS and ancient woodland can be mitigated through provision of a buffer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 10121    | Land at Birch Green                            | Birch/ Layer Breton | Residential  | Yes – as PP46                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. Development would form a logical extension to the settlement boundary and is an appropriate scale for the village, supporting the spatial strategy and settlement hierarchy. Development is contained within the core of the existing village of Birch Green and would not contribute to coalescence between Birch and Birch Green.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 10122    | The Old School                                 | Great Horkesley     | Residential  | Yes - as PP35                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations. Allocating brownfield sites promotes efficient land use while protecting greenfield sites and supporting regeneration.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 10123    | Site west of Chappel Hill                      | Chappel             | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement due to the lack of surrounding development, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 10125    | Cedar Brook Field                              | Great Horkesley     | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 10132    | Brook Meadows                                  | Tiptree             | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and has constraints. Development of the site is likely to significantly harm biodiversity as the site has significant overlap with Inworth Grange Pits LoWS and includes potential Priority habitat woodland. Planning permission for 221 dwellings was refused in 2022 and this decision was upheld on appeal. The reasons for refusal related to landscape harm (reference 202604). The Tiptree Neighbourhood Plan was made in May 2023. The Spatial Strategy clearly sets out the aspiration for growth to be to the north of Tiptree to alleviate existing traffic issues in the centre of the settlement and the delivery of a northern link road, to connect Colchester Road with Grange Road. This site does not contribute to delivering this strategy. The Sustainability Appraisal identifies multiple adverse effects, particularly in relation to landscape character and biodiversity. On this basis, the site is not considered justified for allocation. |
| 10154    | Colchester Willow Ground                       | Colchester          | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as part of the site is allocated as open space in the Adopted Local Plan. The Local plan seeks to protect and enhance the green infrastructure network. Allocating a site designated for open space would be contrary to this approach. The site is further constrained by its significant tree cover and varied topography which has the potential to limit the developable area. The Biodiversity Protection and BNG study concluded that development of this site is likely to lead to significant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                        | Settlement       | Proposed use | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------|----------------------------------|------------------|--------------|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                  |                  |              |                                     | harm to biodiversity as the site is part of a LoWS (although incorrectly identified as woodland Priority Habitat). On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 10165    | Land North of Woolmer Green      | Marks Tey        | Residential  | Yes – as OA5                        | Reason for allocating: The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations. Marks Tey is one of the larger settlements located along a transport corridor and identified as a growth area. It is well connected with a railway station, A12 and A120. A large scale, masterplanned development will deliver multiple benefits and create a new community. The Sustainability Appraisal identifies a range of both positive and negative effects. While the site performs well in terms of accessibility, it also gives rise to adverse effects in relation to landscape and biodiversity, which can be avoided or mitigated through masterplanning and comprehensive development across Marks Tey growth area. A Marks Tey Growth Area as Policy OA5 is included in the Submission Plan. This replaces PP17 and PP18 and provides a wider growth area policy for the combined wider area to deliver homes, jobs, open space and community infrastructure. Some / all of this site is included in the Growth area. It is intended to deliver a mix of uses which includes housing, employment, infrastructure, significant open space. The exact uses on this site within the growth area will be informed by masterplanning. |
| 10171    | Land Adjacent to 124 School Road | Copford          | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site performs less favourable than alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10173    | Livelihoods                      | Marks Tey        | Residential  | Yes – as OA5                        | <b>Reason for allocating:</b> The site performs positively in the Sustainability Appraisal, particularly in relation to accessibility to services, public transport provision and access to employment opportunities, reflecting the site's sustainable location. A Marks Tey Growth Area as Policy OA5 is included in the Submission Plan. This replaces PP17 and PP18 and provides a wider growth area policy for the combined wider area to deliver homes, jobs, open space and community infrastructure. Some / all of this site is included in the Growth area. It is intended to deliver a mix of uses which includes housing, employment, infrastructure, significant open space. The exact uses on this site within the growth area will be informed by masterplanning.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 10175    | Haycocks Yard                    | West Mersea      | Commercial   | No                                  | <b>Reason for discounting:</b> The site is a remote rural location some distance from the built-up area of West Mersea with limited access to the Strategic Road Network. Although some maritime commercial activities are currently permitted it is not a preferred location to intensify employment use.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 10177    | Sawdon                           | Great Wigborough | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. The site performs poorly in the Sustainability Appraisal and SLAA compared to reasonable alternatives because it is subject to multiple negative effects across key sustainability objectives. In particular, it performs poorly in relation to land use (SA2), biodiversity and heritage (SA7 and SA8), and environmental constraints such as air quality and water (SA13 and SA14), where it records negative or significant negative effects. In contrast, a number of reasonable alternatives perform more positively across these objectives, resulting in a weaker overall sustainability performance for this site. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 10178    | Land South of Colchester Road    | West Bergholt    | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward principally due to concerns about coalescence with Colchester and an illogical extension to the village. The site is considered more separate and detached from facilities and services when compared against alternatives. The preferred sites, which further extend the neighbourhood plan site allocations are more favourable and capable of delivering an appropriate level of growth for West Bergholt over the plan period. The Sustainability Appraisal identifies adverse effects, particularly in relation to landscape character, biodiversity and scale of development. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                          | Settlement      | Proposed use | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------|------------------------------------|-----------------|--------------|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10179    | Sawdon - Kemps Farm                | Peldon          | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and has constraints. The site is considered more separate and detached from facilities and services, when compared against alternatives. A large proportion of the site is also located in Flood Zones 2 and 3. The site performs poorly in the Sustainability Appraisal and SLAA compared to reasonable alternatives because it is subject to multiple negative effects across key sustainability objectives. In particular, it performs poorly in relation to land use (SA2), biodiversity and heritage (SA7 and SA8), and environmental constraints such as air quality and water (SA13 and SA14), where it records negative or significant negative effects. In contrast, a number of reasonable alternatives perform more positively across these objectives, resulting in a weaker overall sustainability performance for this site. On this basis, the site is not considered justified for allocation. |
| 10181    | Peldon Hall Farm                   | Peldon          | Residential  | Yes – as PP49b                      | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. Development would form a logical extension to the settlement boundary and is an appropriate scale for the village, supporting the spatial strategy and settlement hierarchy. Development would maintain the character of the village better than alternative sites and would be unlikely to harm biodiversity. Previous concerns were that development would lead to the loss of priority habitat, evidence has been provided demonstrating that the site does not include any priority woodland habitat.                                                                                                                                                                                                                                                                                                                                                                                       |
| 10185    | Land west of Langham Lane          | Langham         | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 10196    | Land South of Halstead Road Site 1 | Eight Ash Green | Residential  | Yes – as PP32a                      | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. Whilst there were previous concerns that the site alone is detached from the settlement, combined sites are considered well-related to the existing settlement (and support in principle to this direction of growth), supporting the spatial strategy by directing growth to sustainable locations. This site to the south compared to alternatives avoids potential impacts on the woodland Priority Habitat and Ancient Woodland and is considered locally as being more favourable.                                                                                                                                                                                                                                                                                                                                                                                                         |
| 10197    | Land south of Halstead Road Site 2 | Eight Ash Green | Residential  | Yes – as PP32a                      | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. Whilst there were previous concerns that the site alone is detached from the settlement, combined sites are considered well-related to the existing settlement (and support in principle to this direction of growth), supporting the spatial strategy by directing growth to sustainable locations. This site to the south compared to alternatives avoids potential impacts on the woodland Priority Habitat and Ancient Woodland and is considered locally as being more favourable.                                                                                                                                                                                                                                                                                                                                                                                                         |
| 10208    | Land North of Halstead Road        | Eight Ash Green | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and is subject to constraints. Development would harm the character of the gap between Colchester and Eight Ash Green. The site is considered more separate and detached from facilities and services, when compared against alternatives. The Sustainability Appraisal identifies multiple adverse effects, particularly in relation to landscape character and biodiversity. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 10211    | Land east of Fingringhoe Road      | Rowhedge        | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and has constraints. The site is considered more separate and detached from facilities and services, when compared against alternatives. The site is adjacent to Birch Brook and has a steep gradient which is likely to impact the developable area. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 10225    | Site adjoining Clay Barn           | Fingringhoe     | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. Furthermore, the Biodiversity Protection and BNG study concluded that development of the site is likely to lead to harm to biodiversity as development will require loss of established grassland. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                                   | Settlement             | Proposed use                                                                    | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------|---------------------------------------------|------------------------|---------------------------------------------------------------------------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10226    | Land East of School Road                    | Copford                | Residential                                                                     | Yes – as PP29a                      | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations. Development will deliver community infrastructure and enhanced open space. While there are identified constraints relating to increased recreational disturbance to Pit Woods LoWS, these are considered capable of mitigation through the provision of buffers and enhanced open space.                                                                                                                                                                                                                                    |
| 10228    | Land adjacent Lower Road                    | Peldon                 | Residential                                                                     | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and has constraints. The site is considered more separate and detached from facilities and services, when compared against alternatives. The Biodiversity Protection and BNG study concluded that development of this site is likely to lead to significant harm to biodiversity as the site development would impact Priority habitat woodland. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                          |
| 10229    | Land north of Colchester Road               | West Bergholt          | Residential                                                                     | Yes – as PP43                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. The adjacent site is allocated in the neighbourhood plan and this site, which is extended from the Preferred Options, forms a logical extension to the settlement and neighbourhood plan allocation when compared against alternatives.                                                                                                                                                                                                                                                                                    |
| 10230    | Land south of Doggetts Lane Service Station | Marks Tey              | Commercial (Employment, Retail, Sports and Leisure, Restaurant/café, Logistics) | Yes – as OA5                        | <b>Reason for allocating:</b> A Marks Tey Growth Area as Policy OA5 is included in the Submission Plan. This replaces PP17 and PP18 and provides a wider growth area policy for the combined wider area to deliver homes, jobs, open space and community infrastructure. Some / all of this site is included in the Growth area. It is intended to deliver a mix of uses which includes housing, employment, infrastructure, significant open space. The exact uses on this site within the growth area will be informed by masterplanning.                                                                                                                                                                                                                                                                             |
| 10231    | Land north of Colchester Road               | West Mersea            | Residential & holiday lodges                                                    | No                                  | <b>Reason for discounting:</b> The site is not taken forward as the Biodiversity Protection and BNG study concluded that development is likely to lead to significant harm to biodiversity. Development would impact Priority habitat woodland plus individual trees, scrub, and long-established grassland. It is also considered that development of this site would lead to adverse visual impacts and create a harmful urbanisation to the settlement edge. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                     |
| 10233    | Land at Oxley House                         | Abberton and Langenhoe | Residential                                                                     | No                                  | <b>Reason for discounting:</b> The site is not taken forward as the alternative allocated site is preferable in terms of being a logical extension and an appropriate scale for the village. Furthermore, the site is constrained by trees, which would be difficult to retain including retention of the orchard priority habitat. There are also potential wider landscape impacts. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                               |
| 10239    | Gosbecks Business Park                      | Colchester             | Employment                                                                      | Yes - as PEP4                       | <b>Reason for allocating:</b> This is an employment site in the Adopted Local Plan and is suitable as such in the new Local Plan. Residential development is not considered appropriate as it would lead to the loss of existing businesses.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 10244    | Land adjacent New Park Cottage              | Tiptree                | Residential                                                                     | Yes – as PP22b                      | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 10245    | Land northwest of Harwich Road              | Colchester             | Residential                                                                     | Yes – as PP9                        | <b>Reason for allocating:</b> Development of adjacent sites would deliver substantial new development on the edge of Colchester, which is at the top of the spatial hierarchy. The site is well related to the built form and provides good access to key services and infrastructure. The combined sites which make up this strategic allocation have been identified through the SLAA as suitable, available and achievable, and have been promoted by landowners with evidence of landowners working together. The Sustainability Appraisal identifies a range of both positive and negative effects. While the site performs well in terms of accessibility to services and employment, it also gives rise to adverse effects in relation to landscape and biodiversity. Development will be required to be planned |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                         | Settlement | Proposed use                                         | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------|-----------------------------------|------------|------------------------------------------------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                   |            |                                                      |                                     | comprehensively to mitigate harm and maximise the benefits. Biodiversity harm due to proximity to designated sites can be mitigated through provision of a buffer to the SSSI and LoWS & discussions have taken place with Natural England. The sites area habitats are of low biodiversity value (although the hedgerows and watercourse are of high value) and negative impacts in terms of wildlife connectivity are mitigable. The combined site would have the potential to deliver significant ecological enhancement, including improved connectivity between the SSSI, LoWS & new SANG.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 10248    | Land north west Colne Bank Avenue | Colchester | Residential                                          | No                                  | <b>Reason for discounting:</b> The site has been discounted as it is subject to significant constraints, which would preclude development. One of the key sensitivities and values for the River Colne Valley LCA is: 'Cymbeline Meadows LWS is a large protecting valuable and increasingly scarce river floodplain habitats, including a mix of pastures, marshland, hedgerows, and aquatic vegetation.' Development of this site would adversely affect landscape character. Furthermore, development would significantly harm biodiversity as almost the entire site is LoWS and floodplain grassland Priority Habitat. The Sustainability Appraisal identifies adverse effects, particularly in relation to landscape character and biodiversity. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 10251    | Stanway Nurseries                 | Colchester | Mixed use (residential and small area of commercial) | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is constrained by the access, with the SLAA identifying that access is not considered safe and suitable. The site performs less favourable than alternatives, part of the site is open space. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10253    | Ship Inn Field                    | Tiptree    | Residential                                          | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. Development of the site would harm the character of the edge of the settlement and reduce the gap between Tiptree and Tiptree Heath. The Tiptree Neighbourhood Plan was made in May 2023. The Spatial Strategy clearly sets out the aspiration for growth to be to the north of Tiptree to alleviate existing traffic issues in the centre of the settlement and the delivery of a northern link road, to connect Colchester Road with Grange Road. This site does not contribute to delivering this strategy. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10254    | Apex Lodge                        | Little Tey | Residential                                          | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 10255    | Green Farm House                  | Copford    | Residential                                          | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is constrained, development would harm the character of the gap between Copford and Copford Green. The site is adjacent to the Copford Green Conservation Area. The site performs less favourable than alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 10256    | Buildings Farm                    | Colchester | Residential                                          | Yes – as PP9                        | <b>Reason for allocating:</b> Development of adjacent sites would deliver substantial new development on the edge of Colchester, which is at the top of the spatial hierarchy. The site is well related to the built form and provides good access to key services and infrastructure. The combined sites which make up this strategic allocation have been identified through the SLAA as suitable, available and achievable, and have been promoted by landowners with evidence of landowners working together. The Sustainability Appraisal identifies a range of both positive and negative effects. While the site performs well in terms of accessibility to services and employment, it also gives rise to adverse effects in relation to landscape and biodiversity. Development will be required to be planned comprehensively to mitigate harm and maximise the benefits. Biodiversity harm due to proximity to designated sites can be mitigated through provision of a buffer to the SSSI and LoWS & discussions have taken place with Natural England. The sites area habitats are of low biodiversity value (although the hedgerows and watercourse are of high value) and negative impacts in terms of wildlife connectivity are mitigable. The combined site would have the potential to deliver significant ecological enhancement, including improved connectivity between the SSSI, LoWS & new SANG. |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                     | Settlement       | Proposed use | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------|-------------------------------|------------------|--------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10257    | Woodlands Farm                | Great Horkesley  | Residential  | no                                  | <b>Reason for discounting:</b> The Biodiversity Protection and BNG study concluded that development of the site is likely to lead to harm to biodiversity as it includes woodland Priority Habitat and adjacent development could result in its degradation. Development would also likely harm landscape character and the site includes areas of flood risk.                                                                                                                                                                                                                                                                                                                                                                      |
| 10258    | Black Brook Farm              | Great Horkesley  | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and is subject to constraints. The Biodiversity Protection and BNG study concluded that development of the site is likely to lead to harm to biodiversity as it includes woodland Priority Habitat and adjacent development could result in its degradation. Development would likely harm landscape character and the site includes areas of flood risk. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                         |
| 10259    | Land north of Woodlands       | Great Horkesley  | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                  |
| 10260    | Land adjacent Elms Farm House | Tiptree          | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement nor does it contribute towards the strategy in the neighbourhood plan. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                            |
| 10261    | Land adjacent Bonnie Blue Oak | Tiptree          | Residential  | Yes – as PP20                       | <b>Reason for allocating:</b> The Tiptree Neighbourhood Plan was made in May 2023. The Spatial Strategy clearly sets out the aspiration for growth to be to the north of Tiptree to alleviate existing traffic issues in the centre of the settlement and the delivery of a northern link road, to connect Colchester Road with Grange Road. The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. Development of this site, combined with neighbouring sites, would help to realise the vision of the neighbourhood plan. |
| 10262    | Highlands, Kelvedon Road      | Tiptree          | Residential  | Yes - as PP21                       | <b>Reason for allocating:</b> The Tiptree Neighbourhood Plan was made in May 2023. The Spatial Strategy clearly sets out the aspiration for growth to be to the north of Tiptree to alleviate existing traffic issues in the centre of the settlement and the delivery of a northern link road, to connect Colchester Road with Grange Road. The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. Development of this site, combined with neighbouring sites, would help to realise the vision of the neighbourhood plan. |
| 10264    | Land south of Halstead Road   | Eight Ash Green  | Residential  | Yes – as PP32a                      | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. Whilst there were previous concerns that the site alone is detached from the settlement, combined sites are considered well-related to the existing settlement (and support in principle to this direction of growth), supporting the spatial strategy by directing growth to sustainable locations.                                                                                                                                                                                                                                                                       |
| 10265    | Land at Moat Road             | Fordham          | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. The Biodiversity Protection and BNG study concluded that development of the site is likely to lead to harm to biodiversity as it would impact a significant area of rough grassland and scrub developing. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                        |
| 10266    | Land South Malting Green Road | Layer de la Haye | Residential  | Yes – as PP40a                      | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. Development would support the spatial strategy by directing growth to sustainable locations. Previous concern about settlement morphology can be addressed through design.                                                                                                                                                                                                                                                                                                                                                                                                 |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                        | Settlement      | Proposed use | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------|----------------------------------|-----------------|--------------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10267    | Tey Gardens                      | Little Tey      | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                               |
| 10291    | Land opposite Wick Road          | Langham         | Residential  | Yes – as PP38                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations. The adjacent site is allocated in the adopted local plan and bringing forward this site, together with the current allocation, would deliver a more comprehensive development when compared against alternatives.                                                                                                                                                                                                                                    |
| 10479    | Folkard Gardens                  | Copford         | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is constrained, development would harm the character of the gap between Copford and Copford Green. The site performs less favourable than alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                  |
| 10486    | Land north of Maldon Road,       | Tiptree         | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. Whilst the site performs positively in the Sustainability Appraisal, particularly in relation to accessibility, health and wellbeing, and access to services (SA4, SA5 and SA6), development of the site would harm the character of the edge of the settlement and reduce the gap between Tiptree and Tiptree Heath and would be contrary to the vision of the Tiptree neighbourhood plan. On this basis, the site is not considered justified for allocation.                   |
| 10488    | Bullbanks Farm                   | Eight Ash Green | Commercial   | Yes – as PEP9                       | <b>Reason for allocating:</b> The site is well located in relation to proposed housing growth. It has reasonable access to Strategic Road Network with its location offering potential suitability for some employment uses.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 10492    | Land adjacent Rectory Road       | Copford         | Residential  | Yes – as OA5                        | <b>Reason for allocating:</b> The site was not taken forward in the preferred options. The constraints that apply to the site may be mitigated if is taken forward in a phased way as part of the wider growth area for Marks Tey. A Marks Tey Growth Area as Policy OA5 is included in the Submission Plan. This replaces PP17 and PP18 and provides a wider growth area policy for the combined wider area to deliver homes, jobs, open space and community infrastructure. Some / all of this site is included in the Growth area. It is intended to deliver a mix of uses which includes housing, employment, infrastructure, significant open space. The exact uses on this site within the growth area will be informed by masterplanning. |
| 10508    | Land East of Plummers Road       | Fordham         | Residential  | Yes – as PP33                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The Sustainability Appraisal identifies a range of both positive and negative effects. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations. The site is adjacent to a site currently under construction and development would form a logical extension to the settlement boundary when compared against alternatives.                                                                                                                                                                                     |
| 10510    | Land to the East of Nayland Road | Great Horkesley | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. Although the site is adjacent to the residential allocation in the adopted Local Plan, the site is detached by the landscape buffer as part of the planning permission granted for the existing allocation. The site has varied topography which has the potential to limit the developable area. On this basis, the site is not considered justified for allocation.                                                                                                             |
| 10511    | Land west Hall Road              | Tiptree         | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. Whilst the site performs positively in the Sustainability Appraisal, particularly in relation to accessibility, health and wellbeing, and access to services (SA4, SA5 and SA6), development of the                                                                                                                                                                                                                                                                               |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                                 | Settlement    | Proposed use                                     | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------|-------------------------------------------|---------------|--------------------------------------------------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                           |               |                                                  |                                     | site would be contrary to the vision of the Tiptree neighbourhood plan. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 10514    | Land west and east of North Lane          | Marks Tey     | Residential                                      | Yes – as OA5                        | <b>Reason for allocating:</b> A Marks Tey Growth Area as Policy OA5 is included in the Submission Plan. This replaces PP17 and PP18 and provides a wider growth area policy for the combined wider area to deliver homes, jobs, open space and community infrastructure. Some / all of this site is included in the Growth area. It is intended to deliver a mix of uses which includes housing, employment, infrastructure, significant open space. The exact uses on this site within the growth area will be informed by masterplanning.                                                                                                                                                                                                                        |
| 10515    | Land east of Layer Road                   | Colchester    | Residential                                      | Yes – as PP10                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. Whilst there were concerns that development would constitute ribbon development, development of the site combined with the neighbouring site with a policy requirement for comprehensive masterplanning would relate well to the existing settlement and support the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy.                                                                                                                                                                                                                                      |
| 10520    | Land adjacent Tiptree Hall Lane           | Tiptree       | Residential                                      | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and has constraints. The SLAA Stage 2 identified that access is not considered safe and suitable. The site would not contribute towards the strategy in the neighbourhood plan. The Sustainability Appraisal identifies adverse effects, particularly in relation to landscape character and biodiversity. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                           |
| 10522    | Land adjacent 57 Rowhedge Road            | Colchester    | Residential                                      | No                                  | <b>Reason for discounting:</b> The site is not taken forward as the land owner has clearly set out their intention to develop a small-scale residential scheme (1 to 2 units), this could come forward via a planning application, outside of the Local Plan. The site is constrained by woodland Priority Habitat on site. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                    |
| 10526    | Land between White Hart Lane & Manor Road | West Bergholt | Residential                                      | Yes – as PP42                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. The adjacent site is allocated in the neighbourhood plan and this site, which is extended from the Preferred Options, forms a logical extension to the settlement and neighbourhood plan allocation when compared against alternatives.                                                                                                                                                                                                                               |
| 10527    | Land south of Factory Hill                | Tiptree       | Commercial - Employment, Retail, Restaurant/café | Yes – as PEP8                       | <b>Reason for allocating:</b> The site is allocation for employment use in the adopted Local Plan and identified in the Employment Study as continuing to be suitable and needed. It is aligned with proposed housing growth in Tiptree.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10531    | Land north of Church Road                 | Copford       | Residential                                      | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 10532    | Land east of Factory Hill                 | Tiptree       | Older persons housing                            | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and has constraints. The site is public open space as part of the Factory Hill development and allocated as open space in the Adopted Local Plan. The approach to the Local Plan is to protect and enhance the green infrastructure network. Allocating a site designated for open space would be contrary to this approach. Development of the site would harm the character of the edge of the settlement and reduce the gap between Tiptree and Tolleshunt Knights. The site would not contribute towards the strategy in the neighbourhood plan. On this basis, the site is not considered justified for allocation. |
| 10534    | Land East of Factory Hill                 | Tiptree       | Residential                                      | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and has constraints. Development of the site would harm the character of the edge of the settlement and reduce the gap between Tiptree and Tolleshunt Knights. The site would not contribute towards the strategy in the neighbourhood plan. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                         |

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| Site ref | Site name                             | Settlement          | Proposed use | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------|---------------------------------------|---------------------|--------------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10535    | Land off New Road                     | Aldham              | Residential  | Yes - as PP45                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. Development would form a logical extension to the settlement boundary and is an appropriate scale for the village, supporting the spatial strategy and settlement hierarchy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 10536    | Land southwest of Halstead Road       | Eight Ash Green     | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. Development would harm the character of the gap between Colchester and Eight Ash Green. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 10538    | Land south of Church Road             | Copford             | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 10547    | Land south Long Road West             | Dedham              | Residential  | Yes – as PP30                       | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 10548    | Land east of Hall Road                | Copford             | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is subject to significant constraints. The eastern area of the site is located within Flood Zones 2 and 3. The Biodiversity Protection and BNG Study concluded that development of the site is likely to lead to harm to biodiversity as the site includes an area of Priority woodland habitat, and is adjacent to the Roman River and the Keepers Cottage Woods LoWS. The site performs poorly in the Sustainability Appraisal and SLAA compared to reasonable alternatives because it is located in a more peripheral and less accessible location. This results in negative effects in relation to sustainable transport and access to services (SA4 and SA6), alongside significant negative effects relating to land use (SA2), reflecting the loss of greenfield land. Compared to more sustainably located alternatives, the site performs less favourably overall. On this basis, the site is not considered justified for allocation. |
| 10566    | Oakview Landscapes Ltd, Pattens Yard, | West Bergholt       | Commercial   | Yes – as PEP11                      | <b>Reason for allocating:</b> The Employment Study 2024 assessed the site positively with moderate access to Strategic Road Network but good quality existing employment site. The site provides an extension to an existing site. It is aligned with proposed housing growth and in accordance with the spatial strategy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 10567    | Land west of The Causeway             | Great Horkesley     | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 10569    | Land East of Brook Road               | Great Tey           | Residential  | Yes – as PP36a                      | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 10571    | Bumblebee Farm                        | Birch/ Layer Breton | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as whilst the site is adjacent to the settlement boundary, it is located to the south of the settlement of Birch and Layer Breton and is detached from the settlement and facilities where the character is more rural. The site is also constrained in terms of biodiversity with the Biodiversity Protection and BNG study concluding that development of the site is likely to lead to harm to biodiversity as development will impact on established grassland. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                               |
| 10587    | Land north of Halstead Road           | Eight Ash Green     | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and is subject to constraints. Development would harm the character of the gap between Colchester and Eight Ash Green. The site is considered more separate and detached from facilities and services, when compared against alternatives. The site is covered in trees. The loss of which would lead to harm to biodiversity and landscape and be contrary to the Council's ambition to increase tree canopy cover. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                 |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                  | Settlement             | Proposed use | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| 10594    | Wivenhoe Quarry            | Wivenhoe               | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and has multiple constraints. The site is considered more separate and detached from facilities and services, when compared against alternatives. Development of this site is likely to significantly harm biodiversity with Wivenhoe Gravel Pit SSSI wholly within the site boundary and Wivenhoe Cross Pit LoWS partly within the site boundary. The Biodiversity Protection and BNG study reported that there is woodland Priority Habitat within the site and a mosaic of habitats of nature conservation value. The LCA includes the open mosaic habitat at Wivenhoe Cross Pit and Wivenhoe Gravel Pit SSSI as key sensitivities and values. Wivenhoe's emerging Nature Plan identifies this as a mosaic of habitats surrounding the town. Each on its own is a crucial resource for wildlife; each is a component of the town's rural character. The Sustainability Appraisal identifies multiple adverse effects, particularly in relation to landscape character, biodiversity and scale of development. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                          |
| 10600    | Picketts Farm              | Fingringhoe            | Residential  | Yes – as PP47                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and development would deliver a small scale development close to the core of the village.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 10611    | Land East of School Road   | Copford                | Residential  | Yes – as PP29b                      | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations. Development will deliver community infrastructure and open space.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10616    | Land north of Bromley Road | Colchester             | Residential  | Yes - as PP9                        | <b>Reason for allocating:</b> Development of adjacent sites would deliver substantial new development on the edge of Colchester, which is at the top of the spatial hierarchy. The site is well related to the built form and provides good access to key services and infrastructure. The combined sites which make up this strategic allocation have been identified through the SLAA as suitable, available and achievable, and have been promoted by landowners with evidence of landowners working together. The Sustainability Appraisal identifies a range of both positive and negative effects. While the site performs well in terms of accessibility to services and employment, it also gives rise to adverse effects in relation to landscape and biodiversity. Development will be required to be planned comprehensively to mitigate harm and maximise the benefits. Biodiversity harm due to proximity to designated sites can be mitigated through provision of a buffer to the SSSI and LoWS & discussions have taken place with Natural England. The sites area habitats are of low biodiversity value (although the hedgerows and watercourse are of high value) and negative impacts in terms of wildlife connectivity are mitigable. The combined site would have the potential to deliver significant ecological enhancement, including improved connectivity between the SSSI, LoWS & new SANG. |
| 10617    | Lakelands Crescent         | Colchester             | Residential  | Yes - as PP8                        | <b>Reason for allocating:</b> This small site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. Development of the larger site promoted would not be appropriate as development of a Local Wildlife Site (LoWS) would harm biodiversity. The LoWS Review reviewed Stanway Pits LoWS and concluded that the majority of the site still retains open mosaic habitats on previously developed land which are of high ecological value particularly for invertebrates and birds. Management should focus on protecting the rest of the site from further development as the open mosaic habitats offer numerous habitats to a wide range of wildlife. The LoWS boundary has been updated to reflect the development which has recently taken place within the centre and north east of the site, but this does not include the site promoted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 10618    | View Park                  | Abberton and Langenhoe | Residential  | Yes – as PP25                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. In comparison to alternative sites, it performs more favourably in terms of potential landscape and biodiversity impacts.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                            | Settlement             | Proposed use                                   | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------|--------------------------------------|------------------------|------------------------------------------------|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10621    | Land at St Ives Road                 | Peldon                 | Mixed use (residential & commercial)           | No                                  | <b>Reason for discounting:</b> The site has been discounted following further assessment and comparison with alternative sites. The response to the consultation identified harm if the greenspace in the heart of village is lost as this is part of the character of the village. Alternative sites are available for development in Peldon to deliver small scale development on sites which would avoid harm to the character of the village and fit in more with the existing settlement pattern.                                                                                                                                                                                                                                                                                                                      |
| 10622    | Land East of Mersea Road             | Abberton and Langenhoe | Residential                                    | No                                  | <b>Reason for discounting:</b> The site lies within the coastal protection belt & the scale of development would harm landscape character including views to Mersea. The LCA includes 'Strong sense of visual openness across much of the landscape, with long-range views across farmland towards adjacent estuarine marshes particularly from higher ground' as one of the Langenhoe Coastal Farmland character areas key sensitives and values. The Landscape Strategy includes 'Visually intrusive and incongruous development should be avoided, particularly on more visually open higher ground to the north.' The Sustainability Appraisal identifies adverse effects, particularly in relation to landscape character and biodiversity. On this basis, the site is not considered justified for allocation.        |
| 10623    | Land north and south of Dobbies Lane | Marks Tey              | Commercial                                     | Yes – as OA5                        | <b>Reason for allocating:</b> A Marks Tey Growth Area as Policy OA5 is included in the Submission Plan. This replaces PP17 and PP18 and provides a wider growth area policy for the combined wider area to deliver homes, jobs, open space and community infrastructure. Some / all of this site is included in the Growth area. It is intended to deliver a mix of uses which includes housing, employment, infrastructure, significant open space. The exact uses on this site within the growth area will be informed by masterplanning.                                                                                                                                                                                                                                                                                 |
| 10627    | Land east Dawes Lane                 | West Mersea            | Residential                                    | Yes - as PP23a                      | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. The site performs positively in the Sustainability Appraisal, particularly in relation to accessibility, health and wellbeing, and access to services (SA4, SA5 and SA6), where it achieves notable positive or significant positive effects compared to many reasonable alternatives. While some adverse effects are identified (consistent with most sites), overall it performs better than many alternatives, particularly in avoiding the more significant negative effects seen for peripheral or less accessible sites. |
| 10629    | Place Farm                           | Colchester             | Residential                                    | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is subject to significant constraints. Development is likely to significantly harm biodiversity as the site lies within a LoWS, within Priority Habitat and is close to Upper Colne Marshes SSSI. The Sustainability Appraisal and SLAA identified significant negative effects in relation to biodiversity. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                         |
| 10632    | Land south of Tower Business Park    | Tiptree                | Commercial                                     | Yes – as PEP16                      | <b>Reason for allocating:</b> The site is identified in the Employment Study as continuing to be suitable and needed and is aligned with proposed housing growth in Tiptree.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 10634    | Land at Kelvedon Road                | Messing                | Residential                                    | Yes – as PP48                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. Development would form a logical extension to the settlement boundary and is an appropriate scale for the village, supporting the spatial strategy and settlement hierarchy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 10635    | Land north/south Accommodation Road  | Boxted                 | Mixed use (approx. 26ha res, 4.5ha commercial) | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement compared to alternatives. Development would reduce the gap between Colchester and Great Horkesley. The site is also constrained by multiple ownerships with a number of dwellings to be retained and businesses to be relocated as part of any development proposal which would likely impact the developable area and overall deliverability. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                |
| 10647    | Wakes Hall Business Centre           | Wakes Colne            | Commercial                                     | Yes – as PEP12                      | <b>Reason for allocating:</b> The site is identified in the Employment Study as continuing to be suitable and needed. It is also aligned with proposed housing growth.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 10649    | Land west of Station Road            | Wakes Colne            | Residential                                    | Yes – as PP28                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. Development of this site would create a safer access to the                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                                     | Settlement      | Proposed use | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------|-----------------------------------------------|-----------------|--------------|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                               |                 |              |                                     | railway station. Additional community benefits are proposed, including substantial open space. The Biodiversity Protection and BNG study concluded that development of the site is likely to lead to harm to biodiversity as the site is adjacent to Acorn Wood LoWS, a buffer will be needed to avoid harm to the ancient woodland.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 10652    | Land north of the A1124                       | Wakes Colne     | Residential  | No                                  | <b>Reason for discounting:</b> Site overlaps with submissions 10649 which is proposed for allocation. Development of this site larger would create a safer access to the railway station. Additional community benefits are proposed, including substantial open space. The Biodiversity Protection and BNG study concluded that development of the site is likely to lead to harm to biodiversity as the site is adjacent to Acorn Wood LoWS. A buffer will be needed to avoid harm to the ancient woodland.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10656    | Land north of Halstead Road East of Wood Lane | Eight Ash Green | Residential  | No                                  | <b>Reason for discounting:</b> The site was included in the Preferred Options plan as it was considered that development would provide the opportunity to link the two settlement areas of Eight Ash Green and the site's central location means services and facilities will be in close proximity. However, community engagement organised by the parish council suggests that this is the least preferred of all sites promoted in Eight Ash Green. Locally, value is placed on the gap to the north with views towards the woodland between the existing built-up areas. Alternatives to the south avoid potential impacts on the woodland Priority Habitat and Ancient Woodland and are considered locally as being more favourable. A small part of the Preferred Options allocation is not supported by the landowner. These factors together indicate that the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 10657    | Land North Oak Road                           | Tiptree         | Residential  | Yes – as PP19                       | <b>Reason for allocating:</b> The Tiptree Neighbourhood Plan was made in May 2023. The Spatial Strategy clearly sets out the aspiration for growth to be to the north of Tiptree to alleviate existing traffic issues in the centre of the settlement and the delivery of a northern link road, to connect Colchester Road with Grange Road. The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. Development of this site, combined with neighbouring sites, would help to realise the vision of the neighbourhood plan. This is a large site and it is able to deliver community benefits, including substantial open space. The Biodiversity Protection and BNG study concluded that development of the site is likely to lead to harm to biodiversity as the site contains Eden Wood LoWS and overlaps a portion of the Inworth Wood LoWS. It also contains an internal network of Priority native hedgerow including a 'green lane'. However, the site is large enough to avoid or mitigate development within these areas and provide a substantial benefit to the local ecological network through wildlife corridors and better connectivity. |
| 10663    | Land off Newpots Lane                         | Peldon          | Commercial   | No                                  | <b>Reason for discounting:</b> This is a remote rural location with limited access to the Strategic Road Network or other services. The Employment Study identified the site as moderate suitability.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10664    | Land north of Park Lane                       | Langham         | Residential  | Yes – as PP37                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations. Development is large scale and there are no biodiversity or landscape constraints. Development would deliver improved community infrastructure, including substantial open space. Development would contribute towards improvements to wastewater infrastructure and connect separate parts of Langham.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 10665    | Land east of Wick Road                        | Langham         | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and has constraints. The site is considered more separate and detached from facilities and services, when compared against alternatives. It is adjacent to the A12 and would require a sufficient buffer or dwellings to be set back which is likely to impact on deliverability. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 10666    | Land south of School Road                     | Langham         | Residential  | Yes – as PP37                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations. Development is large scale and there are no biodiversity or landscape constraints. Development would deliver improved community infrastructure, including substantial open                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                                                     | Settlement  | Proposed use | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------|---------------------------------------------------------------|-------------|--------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                                               |             |              |                                     | space. Development would contribute towards improvements to wastewater infrastructure and connect separate parts of Langham.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 10671    | Land south A12 and north of the proposed new route of the A12 | Marks Tey   | Commercial   | Yes – as OA5                        | <b>Reason for allocating:</b> This large employment site is assessed positively and identified as having potential suitability for employment through the Employment Study 2024. It is well located in relation to proposed strategic housing site with potential for enhance connectivity between the two. The site is of scale to offer different employment opportunities than some alternatives. A Marks Tey Growth Area as Policy OA5 is included in the Submission Plan. This replaces PP17 and PP18 and provides a wider growth area policy for the combined wider area to deliver homes, jobs, open space and community infrastructure. Some / all of this site is included in the Growth area. It is intended to deliver a mix of uses which includes housing, employment, infrastructure, significant open space. The exact uses on this site within the growth area will be informed by masterplanning.                                                      |
| 10673    | Land south Mersea Road                                        | Peldon      | Residential  | Yes - as PP49a                      | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. Development would form a logical extension to the settlement boundary and is an appropriate scale for the village (development is on a smaller site than promoted in the call for sites), supporting the spatial strategy and settlement hierarchy. Development would maintain the character of the village better than alternative sites and would be unlikely to harm biodiversity.                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10675    | Land south East Road                                          | East Mersea | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as East Mersea is designated in the adopted Local Plan as an 'other village' with a settlement boundary drawn tightly around part of the settlement. In the new Local Plan it is a small settlement. Whilst some small settlements have proposed allocations, development is not considered suitable in East Mersea due to numerous constraints. The village is located some distance away from key services in West Mersea, there is very limited infrastructure (e.g. there is no gas and most of the village has septic tanks), the roads are narrow and winding without footways, it lies within the coastal protection belt and adjacent to the Colne Estuary Special Protection Area and Ramsar site. The Sustainability Appraisal identifies adverse effects, particularly in relation to landscape character and biodiversity. On this basis, the site is not considered justified for allocation. |
| 10676    | Land North Boxted Straight Road                               | Boxted      | Residential  | Yes – as PP26                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and would deliver low density development in keeping with the scale and character of the village, supporting the spatial strategy by directing growth to sustainable locations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 10677    | Land South of the A12                                         | Messing     | Commercial   | No                                  | <b>Reason for discounting:</b> This is promoted alongside a housing site which did not progress through to the second stage of the SLAA assessment. (Situated in Braintree District) An employment allocation without the housing allocation is too remote with limited access to services despite moderate access to the Strategic Road Network.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 10682    | Land to the east of Cross Lane                                | West Mersea | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 10685    | Land North of Boxted Straight Road, Boxted Cross              | Boxted      | Residential  | No                                  | <b>Reason for discounting:</b> Part of this site is allocated in the Preferred Options Plan (site ref 10676) as development of a lower scale than this site would deliver low density development in keeping with the scale and character of the village. Development of the scale of 10685 would not relate well to the scale and nature of the village.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 10686    | Land at Earls Colne Road                                      | Great Tey   | Residential  | Yes – as PP36                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. Development would result in a logical rounding of the existing settlement and presents an opportunity for improvements to the road junction of Earls Colne Road and Chappel Road.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                          | Settlement      | Proposed use                                   | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| 10687    | Land south of Berechurch Hall Road | Colchester      | Residential (including a neighbourhood centre) | Yes – as PP10                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. It performs positively in the Sustainability Appraisal, particularly in relation to accessibility, health and wellbeing, and access to services (SA4, SA5 and SA6), where it achieves notable positive or significant positive effects compared to many reasonable alternatives. The site also benefits from its location in/adjacent to the urban area, which supports stronger performance in relation to economic opportunities and sustainable transport. While some adverse effects are identified (consistent with most sites), overall it performs better than many alternatives, particularly in avoiding the more significant negative effects seen for peripheral or less accessible sites.                                                                                                                                  |
| 10690    | Land South of Marks Tey Village    | Marks Tey       | Mixed use                                      | Yes - as OA5                        | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations. Marks Tey is one of the larger settlements located along a transport corridor and identified as a growth area. It is well connected with a railway station, A12 and A120. A large scale, masterplanned development will deliver multiple benefits and create a new community. The vast majority of the site has low ecological value. A Marks Tey Growth Area as Policy OA5 is included in the Submission Plan. This replaces PP17 and PP18 and provides a wider growth area policy for the combined wider area to deliver homes, jobs, open space and community infrastructure. Some / all of this site is included in the Growth area. It is intended to deliver a mix of uses which includes housing, employment, infrastructure, significant open space. The exact uses on this site within the growth area will be informed by masterplanning.                      |
| 10691    | Land North of Coach Road           | Great Horkesley | Residential                                    | Yes – as PP34                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. This site, combined with adjacent sites, would deliver comprehensive development in the village, providing enhanced open space and better pedestrian connections. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. It performs positively in the Sustainability Appraisal, particularly in relation to accessibility, health and wellbeing, and access to services (SA4, SA5 and SA6), where it achieves notable positive or significant positive effects compared to many reasonable alternatives. The site also benefits from its location in/adjacent to the urban area, which supports stronger performance in relation to economic opportunities and sustainable transport. While some adverse effects are identified (consistent with most sites), overall it performs better than many alternatives, particularly in avoiding the more significant negative effects seen for peripheral or less accessible sites. |
| 10745    | 102 East Road West Mersea          | West Mersea     | Residential                                    | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. Development of this site is likely to lead to harm to the character and appearance of the area, including harm to the setting of a heritage asset, and harm to highway safety. Planning permission was refused in 2021 and this decision was upheld at appeal for these reasons (reference 201467). The site therefore performs less favourably than alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 10746    | The Car Boot field                 | Marks Tey       | Residential                                    | No                                  | <b>Reason for discounting:</b> The site was not taken forward previously for residential development as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. Whilst the site performs positively in the Sustainability Appraisal, particularly in relation to accessibility, health and wellbeing, and access to services (SA4, SA5 and SA6), development would lead to coalescence between Marks Tey and Copford. It is included on the edge of the Marks Tey Growth Area identified as making a contribution to a Strategic Green Gap.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10747    | Tey Green                          | Marks Tey       | Mixed use                                      | Yes - as OA5                        | <b>Reason for allocating:</b> The site performs positively in the Sustainability Appraisal, particularly in relation to accessibility, health and wellbeing, and access to services (SA4, SA5 and SA6), where it achieves notable positive or significant positive effects compared to many reasonable alternatives. The site also benefits from its location, which supports stronger performance in relation to economic opportunities and sustainable transport. While some adverse effects are identified (consistent with most sites), overall it performs better than many alternatives, particularly in avoiding the more significant negative effects seen for peripheral or less accessible                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                      | Settlement    | Proposed use | Is site included in the Local Plan?                                                                                 | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------|--------------------------------|---------------|--------------|---------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                |               |              |                                                                                                                     | sites. A Marks Tey Growth Area as Policy OA5 is included in the Submission Plan. This replaces PP17 and PP18 and provides a wider growth area policy for the combined wider area to deliver homes, jobs, open space and community infrastructure. Some / all of this site is included in the Growth area. It is intended to deliver a mix of uses which includes housing, employment, infrastructure, significant open space. The exact uses on this site within the growth area will be informed by masterplanning.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 10748    | Land off Colchester Road       | West Mersea   | Residential  | No                                                                                                                  | <b>Reason for discounting:</b> The site is not taken forward as it is considered that development would lead to adverse visual impacts and create a harmful urbanisation to settlement edge. This site was subject to a planning application which was refused in March 2020 (reference 200723). The Landscape Strategy for the Mersea Island coastal farmland LCA includes the following: 'Visually intrusive and incongruous development should be avoided, particularly on more visually open areas of higher ground inland and the coastal edges.' The site therefore performs less favourably than alternatives.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 10749    | Land off Colchester Road       | West Bergholt | Residential  | No                                                                                                                  | <b>Reason for discounting:</b> The site was included in the Preferred Options plan but is not taken forward principally due to concerns about coalescence with Colchester and an illogical extension to the village. The site is considered more separate and detached from facilities and services when compared against alternatives. The preferred sites, which further extend the neighbourhood plan site allocations are more favourable and capable of delivering an appropriate level of growth for West Bergholt over the plan period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 10750    | Land off Rowhedge Road         | Colchester    | Residential  | No                                                                                                                  | <b>Reason for discounting:</b> The site is not taken forward as an allocation as it has planning consent and is included in the trajectory as a commitment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10751    | Land off Croquet Gardens       | Wivenhoe      | Residential  | No                                                                                                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and has multiple constraints. The site is considered more separate and detached from facilities and services, when compared against alternatives. The site lies within Wivenhoe Cross Pit LoWS and development of this site is likely to significantly harm biodiversity. The Biodiversity Protection and BNG study reported that most of the site is LoWS. The site is a mosaic of semi-natural habitats including woodland Priority Habitat. Wivenhoe's emerging Nature Plan identifies this as a mosaic of habitats surrounding the town. Each on its own is a crucial resource for wildlife; each is a component of the town's rural character. The site is also designated in the adopted Local Plan as open space. The approach to the Local Plan is to protect and enhance the green infrastructure network. Allocating a site designated for open space would be contrary to this approach. The Sustainability Appraisal identifies positive effects in relation to access but negative environmental impacts. On this basis, the site is not considered justified for allocation. |
| 10752    | Land west Oxley Parker Drive   | Colchester    | Residential  | No<br>Reasonable alternative 10752a (excluding most northern, southern and western parts of sites) also considered. | <b>Reason for discounting:</b> The site is not taken forward as the approach to the Local Plan is to protect and enhance the green infrastructure network and this site is allocated in the adopted Local Plan as open space. There is potential for the site to be delivered as part of larger scale development if the open space is provided elsewhere. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 10755    | Land North of the Fire Station | Wivenhoe      | Residential  | Yes - as PP24                                                                                                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. Whilst this site is within the Wivenhoe neighbourhood plan coalescence break, the degree of harm is likely to be less than alternatives. The site is adjacent to the existing settlement boundary and development can be screened, with a gap maintained, to minimise impacts. Wivenhoe's emerging Nature Plan identifies this as a mosaic of habitats surrounding the town. However, as the Biodiversity                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                    | Settlement       | Proposed use | Is site included in the Local Plan?                                                          | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------|------------------------------|------------------|--------------|----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                              |                  |              |                                                                                              | protection and BNG Study reports that this site has limited natural habitat, it is not considered that development of this site will compromise the Wivenhoe Nature Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10756    | Land East of Colchester Road | Wivenhoe         | Residential  | No                                                                                           | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is within the Wivenhoe neighbourhood plan coalescence break. The degree of harm to this is likely to be more substantial than alternatives. Development of this site would extend development closer to the University, Colchester and the Garden Community and would make a significant contribution towards settlement coalescence. On this basis, the site is not considered justified for allocation.                                                                                                                      |
| 10757    | Land West of Colchester Road | Wivenhoe         | Residential  | No                                                                                           | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is within the Wivenhoe neighbourhood plan coalescence break. The degree of harm to this is likely to be more substantial than alternatives. Development of this site would extend development closer to the University, Colchester and the Garden Community and would make a significant contribution towards settlement coalescence. On this basis, the site is not considered justified for allocation.                                                                                                                      |
| 10758    | Land west of The Folley      | Layer de la Haye | Residential  | Yes – as PP40                                                                                | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations. The site boundary has been extended to the north to include additional land, which has increased the number of dwellings from 60 to 75.                                                                                                                                                                                                                                                |
| 10759    | The Furze                    | Layer de la Haye | Residential  | Yes - as PP39                                                                                | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations.                                                                                                                                                                                                                                                                                                                                                                                        |
| 10760    | Land south of Halstead Road  | Eight Ash Green  | Residential  | No                                                                                           | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                 |
| 10761    | Land off Bakers Lane         | Colchester       | Residential  | Yes – as PP7                                                                                 | <b>Reason for allocating:</b> Colchester city is the top of the spatial hierarchy, and the location of this site is on the edge of the existing urban area. The site has a DfT Connectivity score of 42-51 - higher than many of the site allocations. The amended site boundary provides additional land which will provide better access and pedestrian connectivity to services in Colchester. The potential impacts to the SAM and LoWS can be mitigated and policy safeguards, including a requirement for a buffer, are included in the policy informed by evidence in the LoWS Review, Biodiversity Assessment and HIA.                                                     |
| 10762    | Land North Grove Road        | Tiptree          | Residential  | No                                                                                           | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and has constraints. The SLAA Stage 2 identified that access is not considered safe and suitable. The site would not contribute towards the strategy in the Tiptree Neighbourhood Plan. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                              |
| 10764    | Former Aldham Playing Field  | Aldham           | Residential  | No                                                                                           | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and is constrained by the disused playing field, which includes a play area, on the site. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                            |
| 10765    | Land North London Road       | Copford          | Residential  | No<br>Reasonable alternative 10765a (larger site including land to the west towards existing | <b>Reason for discounting:</b> The site was not taken forward previously for residential development as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. Whilst the site performs positively in the Sustainability Appraisal, particularly in relation to accessibility, health and wellbeing, and access to services (SA4, SA5 and SA6), development would lead to coalescence between Marks Tey and Copford. It is included on the edge of the Marks Tey Growth Area identified as making a contribution to a Strategic Green Gap. |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                               | Settlement      | Proposed use               | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------|-----------------------------------------|-----------------|----------------------------|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                         |                 |                            | development at Francis Court).      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 10766    | The Willows                             | Copford         | Residential                | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is subject to numerous constraints. Development of the site is likely to significantly harm biodiversity as the site includes a significant area of Priority habitat Lowland Mixed Deciduous Woodland and a pond would be negatively impacted. The site is adjacent to the A12 and would require a sufficient buffer of dwellings to be set back, there is also substantial tree coverage across the site which would impact the developable area and deliverability. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                  |
| 10767    | Land North East of Coach Road           | Great Horkesley | Residential                | Yes - as PP34                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. This site, combined with adjacent sites, would deliver comprehensive development in the village, providing enhanced open space and better pedestrian connections. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 10768    | Land South of Armoury Road              | West Bergholt   | Residential                | No                                  | <b>Reason for discounting:</b> The site is not taken forward principally due to concerns about coalescence with Colchester and an illogical extension to the village. The site is considered more separate and detached from facilities and services when compared against alternatives. The preferred sites, which further extend the neighbourhood plan site allocations are more favourable and capable of delivering an appropriate level of growth for West Bergholt over the plan period. The site also includes key views 1, 2 and 3 as identified in the West Bergholt Neighbourhood Plan (Policy CA7) which are highly valued by the community and are to be protected. The LCA includes the following guidance for the Great Horkesley Farmland Plateau: Conserve the individual identity of West Bergholt and Horkesley Heath, by resisting further development between these settlements and the northern edge of Colchester. On this basis, the site is not considered justified for allocation. |
| 10769    | Land North Armoury Road                 | West Bergholt   | Residential                | No                                  | <b>Reason for discounting:</b> The site is not taken forward principally due to concerns about coalescence with Colchester and an illogical extension to the village. The site is considered more separate and detached from facilities and services when compared against alternatives. The preferred sites, which further extend the neighbourhood plan site allocations are more favourable and capable of delivering an appropriate level of growth for West Bergholt over the plan period. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10777    | Land West Queen Street                  | Colchester      | Residential                | No                                  | <b>Reason for discounting:</b> The site is not taken forward as there are multiple businesses operating within the site which are important to the city centre's retail presence, and which would be lost if the site was developed for residential uses. The SLAA identified deliverability concerns as the site has not been promoted by the landowner. The site is constrained by a number of heritage assets within and adjacent to the site. The site performs less favourable than alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 10778    | The Roman Circus Quarter                | Colchester      | Residential                | No                                  | <b>Reason for discounting:</b> The site is not taken forward as part of the site is allocated as open space in the Adopted Local Plan. The approach to the new Local Plan is to protect and enhance the green infrastructure network. Allocating a site designated for open space would be contrary to this approach. The site is constrained as it is within the Garrison Conservation Area. The site performs less favourable than alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 10846    | Land North of Marks Tey Railway Station | Marks Tey       | Mixed use                  | Yes – as OA5                        | <b>Reason for allocating:</b> A Marks Tey Growth Area as Policy OA5 is included in the Submission Plan. This replaces PP17 and PP18 and provides a wider growth area policy for the combined wider area to deliver homes, jobs, open space and community infrastructure. Some / all of this site is included in the Growth area. It is intended to deliver a mix of uses which includes housing, employment, infrastructure, significant open space. The exact uses on this site within the growth area will be informed by masterplanning.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10927    | Seven Saints Farm                       | Colchester      | Residential and commercial | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                                                     | Settlement      | Proposed use               | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------|---------------------------------------------------------------|-----------------|----------------------------|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10928    | Land adjacent Traveller Site                                  | Colchester      | Residential                | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10929    | Cuckoo Farm Arts Studios                                      | Colchester      | Residential and commercial | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10934    | Geantree                                                      | Great Horkesley | Residential                | Yes - as PP34                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. This site, combined with adjacent sites, would deliver comprehensive development in the village, providing enhanced open space and better pedestrian connections and community infrastructure. Including this site in the wider allocation provides an opportunity to provide a sustainable route from Coach Road to the Causeway which will have positive benefits to new and existing communities. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. The Sustainability Appraisal identifies a range of both positive and negative effects. Negative effects can be avoided or mitigated through comprehensive development of the entire site. |
| 10935    | Land north of Ivy Lodge Road                                  | Great Horkesley | Residential                | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and has constraints. The site is considered more separate and detached from facilities and services, when compared against alternatives. The site is covered in trees, the loss of which would harm biodiversity and it would not be possible to achieve an increase in tree canopy cover. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                    |
| 10941    | Land accessible via Chesterwell (Colchester Golf Club Site 2) | Colchester      | Residential                | Yes – as PP5                        | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. The site is adjacent to Chesterwell and is a logical extension to the settlement boundary.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10946    | BT Site                                                       | Colchester      | Residential                | Yes – Yes as PP50                   | <b>Reason for allocating:</b> This site is well-related to the existing settlement and supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. Allocating brownfield sites promotes efficient land use while protecting greenfield sites and supporting regeneration. Approximately half of the site is within an area of flood risk, this part of the site will not be developed.                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 10947    | BT Repeater Station                                           | Colchester      | Residential                | Yes – as PP52                       | <b>Reason for allocating:</b> This site is well-related to the existing settlement and supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. Allocating brownfield sites promotes efficient land use while protecting greenfield sites and supporting regeneration. Whilst the site is currently in use the site has been reassessed given the priority to bring forward brownfield sites and it is shown in the trajectory as coming forward in the later stages of the plan period.                                                                                                                                                                                                                                                                                                                                                |
| 10950    | Vineyard Gate Development                                     | Colchester      | Mixed use                  | Yes - PP2                           | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable. It is a brownfield site and performs positively in the Sustainability Appraisal, particularly in relation to access to services and public transport. The site supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 10951    | St Runwald Car Park                                           | Colchester      | Residential                | Yes – as PP3                        | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable. It is a brownfield site and performs positively in the Sustainability Appraisal, particularly in relation to access to services and public transport. The site supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 10952    | Braiswick                                                     | Colchester      | Residential                | Yes - as PP4                        | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. This is an allocation in the Adopted Local Plan and it is suitable to be retained. Colchester city is top of the settlement hierarchy and development of this site would form a logical                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                      | Settlement      | Proposed use | Is site included in the Local Plan?                                                                                             | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------|--------------------------------|-----------------|--------------|---------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                |                 |              |                                                                                                                                 | extension to Colchester and continuation of the wider adjoining allocation. Mitigation measures are included through local plan policy requirements to address any potential harm to biodiversity and landscape.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 10953    | Middlewick                     | Colchester      | Residential  | No<br><br>Reasonable alternative 10953a (larger site including additional land to the south towards Weir Lane) also considered. | <b>Reason for discounting:</b> The site has been discounted following detailed assessment. It is subject to significant constraints, including significant harm to biodiversity, which precludes development. The site is almost all LoWS, woodland and acid grassland Priority Habitat, corridor of Birch Brook. Recent ecological evidence has provided extensive updated information supported by Natural England. The Sustainability Appraisal identifies adverse effects, particularly in relation to landscape character and biodiversity. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                |
| 10954    | Barrington Road/Bourne Road    | Colchester      | Residential  | No                                                                                                                              | <b>Reason for discounting:</b> The site is not taken forward as part of this site has been granted planning permission as a gypsy and traveller site (231561) and there is no further development potential for this site. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 10956    | Rowhedge Business Park         | Rowhedge        | Residential  | Yes – as PP41                                                                                                                   | <b>Reason for allocating:</b> This is an allocation in the adopted local plan and has been identified through the SLAA as suitable, available and achievable. The site has been promoted by a landowner and it is considered suitable to retain as an allocation. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. Allocating brownfield sites promotes efficient land use while protecting greenfield sites and supporting regeneration. The Biodiversity protection and BNG Study states that development of the site is likely to lead to harm to biodiversity as the site includes small area of woodland Priority Habitat. The woodland will be protected as open space and not form part of development.   |
| 10957    | Highlands Nursery              | Tiptree         | Residential  | No                                                                                                                              | <b>Reason for discounting:</b> This site is allocated in the Tiptree Neighbourhood Plan (made May 2023) for 200 dwellings. There is no additional development potential for this site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 10960    | Land North Colchester Road     | West Bergholt   | Residential  | No                                                                                                                              | <b>Reason for discounting:</b> The site is not taken forward principally due to concerns about coalescence with Colchester and an illogical extension to the village. The site is considered more separate and detached from facilities and services when compared against alternatives. The preferred sites, which further extend the neighbourhood plan site allocations are more favourable and capable of delivering an appropriate level of growth for West Bergholt over the plan period. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                 |
| 10961    | Land Adjacent Halstead Road    | Eight Ash Green | Residential  | No                                                                                                                              | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and has constraints. The site is adjacent to the A12 and would require a sufficient buffer or dwellings to be set back which is likely to impact on deliverability. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                               |
| 10963    | Chapmans Farm                  | Colchester      | Residential  | Yes – as PP53                                                                                                                   | <b>Reason for allocating:</b> This site is well-related to the existing settlement and supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. Allocating brownfield sites promotes efficient land use while protecting greenfield sites and supporting regeneration. The site is shown in the trajectory as coming forward in the later stages of the plan period.                                                                                                                                                                                                                                                                                                                                                                            |
| 10968    | Land of Stanway Western Bypass | Colchester      | Residential  | No                                                                                                                              | <b>Reason for discounting:</b> The site is not taken forward as it is allocated as open space in the Adopted Local Plan. The approach to the new Local Plan is to protect and enhance the green infrastructure network. Allocating a site designated for open space would be contrary to this approach. A planning application for a 72-bed care home was refused in 2024, and this decision was upheld on appeal. The Inspector concluded that the loss of public open space attracted significant weight against the proposal (231671). The site is constrained as it overlaps Stanway Pits LoWS and development of the site is likely to significantly harm biodiversity. The Sustainability Appraisal identifies a range of both positive and negative effects. While the site performs well in |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                   | Settlement | Proposed use               | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------|-----------------------------|------------|----------------------------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                             |            |                            |                                     | terms of accessibility to services and employment, it also gives rise to adverse environmental effects. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                              |
| 10969    | The Crescent                | Colchester | Employment                 | Yes – as PEP1                       | <b>Reason for allocating:</b> The site is not taken forward for residential use as the site is allocated for employment use in the adopted local plan. The Employment Study 2024 confirms it continues to be well suited for a range of employment needs. Residential is not considered further in the context of evidence supporting suitability of the site and the need for additional employment land in the plan period that is suitable for employment purposes. The evidence in the Employment Study justifies continued allocation for employment uses.          |
| 10970    | Gosbecks                    | Colchester | Residential                | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is partly allocated as open space in the Adopted Local Plan. The approach to the Local Plan is to protect and enhance the green infrastructure network. Allocating a site designated for open space would be contrary to this approach. The site is constrained as it is part of an extension to the Gosbecks Local Wildlife Site. On this basis, the site is not considered justified for allocation.                                                                                                |
| 10972    | Spring Lane Nursery         | Colchester | Residential                | No                                  | <b>Reason for discounting:</b> The site has been discounted as it is subject to significant constraints, which would preclude development. One of the key sensitivities and values for the River Colne Valley LCA is: 'Cymbeline Meadows LWS is a large protecting valuable and increasingly scarce river floodplain habitats, including a mix of pastures, marshland, hedgerows, and aquatic vegetation.' Development of this site would adversely affect landscape character. On this basis, the site is not considered justified for allocation.                      |
| 10973    | Whitehall Industrial Estate | Colchester | Residential                | No                                  | <b>Reason for discounting:</b> The site has been discounted as it is subject to significant constraints, which would preclude development. One of the key sensitivities and values for the River Colne Valley LCA is: 'Cymbeline Meadows LWS is a large protecting valuable and increasingly scarce river floodplain habitats, including a mix of pastures, marshland, hedgerows, and aquatic vegetation.' Development of this site would adversely affect landscape character. On this basis, the site is not considered justified for allocation.                      |
| 10975    | Former Fieldgate Site       | Colchester | Residential and commercial | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is constrained by its irregular linear shape with approximately 30% of the site located within Flood Zone 2 and 3. This has the potential to limit the developable area. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                          |
| 10976    | Britannia Car Park          | Colchester | Residential                | Yes – as PP1                        | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable. It performs positively in the Sustainability Appraisal, particularly in relation to accessibility to services, public transport provision and access to employment opportunities, reflecting the site's sustainable location. The site supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. This is a brownfield site and development will contribute towards wider regeneration of the area. |
| 10977    | Former Coldoc Site          | Colchester | Residential and commercial | Yes – as OA1                        | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable. It performs positively in the Sustainability Appraisal, particularly in relation to access to services and public transport. The site supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. This is a brownfield site and development will contribute towards wider regeneration of the area.                                                                                                  |
| 10978    | Scrapyards                  | Colchester | Residential and commercial | Yes – as PP14                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable. It performs positively in the Sustainability Appraisal, particularly in relation to access to services and public transport. The site supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. This is a brownfield site and development will contribute towards wider regeneration of the area.                                                                                                  |
| 10979    | Gas Works Site              | Colchester | Residential and commercial | Yes – as PP14                       | <b>Reason for allocating:</b> This site is well-related to the existing settlement and supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. Allocating brownfield sites promotes efficient land use while protecting greenfield sites and supporting regeneration. The site performs positively in the Sustainability Appraisal, particularly in relation to accessibility to services, public transport provision and access to employment opportunities, reflecting the site's sustainable location.           |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                        | Settlement    | Proposed use               | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------|----------------------------------|---------------|----------------------------|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10980    | Land West of Hawkins Road        | Colchester    | Residential and commercial | Yes - as PP15                       | <b>Reason for allocating:</b> This site is well-related to the existing settlement and supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. Allocating brownfield sites promotes efficient land use while protecting greenfield sites and supporting regeneration.                                                                                                                                                                                                                                                                                                                                                   |
| 10981    | Land East of Hawkins Road        | Colchester    | Residential and commercial | Yes - as OA2                        | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable. It performs positively in the Sustainability Appraisal, particularly in relation to access to services and public transport. The site supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. This is a brownfield site and development will contribute towards wider regeneration of the area.                                                                                                                                                                                                      |
| 10982    | Derelict Coal Yard Site          | Colchester    | Residential and commercial | Yes – as PEP13                      | <b>Preferred Options reason for allocating:</b> Colchester City is top of the spatial hierarchy. This is a brownfield site and development will contribute towards wider regeneration of the area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10984    | Europit & Magdalen Garage Site   | Colchester    | Residential                | Yes – as PP11                       | <b>Reason for allocating:</b> This site is well-related to the existing settlement and supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. Allocating brownfield sites promotes efficient land use while protecting greenfield sites and supporting regeneration. The site performs positively in the Sustainability Appraisal, particularly in relation to accessibility to services, public transport provision and access to employment opportunities, reflecting the site's sustainable location.                                                                                                               |
| 10985    | 83-102 Magdalen Street           | Colchester    | Residential                | Yes – as OA3                        | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable. It performs positively in the Sustainability Appraisal, particularly in relation to accessibility to services, public transport provision and access to employment opportunities, reflecting the site's sustainable location. The site supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. This is a brownfield site and development will contribute towards wider regeneration of the area. The site allocation excludes the land at 83 Magdalen Street as it is not supported by the landowner |
| 10986    | 146 Magdalen Street              | Colchester    | Residential                | No                                  | <b>Reason for discounting:</b> The site is not taken forward as development of the site not supported by the landowner. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 10987    | Ford Car Showroom                | Colchester    | Residential                | Yes - as OA3                        | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable. It performs positively in the Sustainability Appraisal, particularly in relation to accessibility to services, public transport provision and access to employment opportunities, reflecting the site's sustainable location. The site supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. This is a brownfield site and development will contribute towards wider regeneration of the area.                                                                                                     |
| 10988    | Land at Robertson Van Hire       | Colchester    | Residential                | No                                  | <b>Reason for discounting:</b> The site is not taken forward as development of the site not supported by the landowner. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 10991    | Former Telephone Exchange        | Tiptree       | Residential                | Yes – as PP22                       | <b>Reason for allocating:</b> This site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. Allocating brownfield sites promotes efficient land use while protecting greenfield sites and supporting regeneration.                                                                                                                                                                                                                                                                                                                                                                                    |
| 10994    | King Edward Quay Industrial Park | Colchester    | Residential and commercial | Yes - as OA1                        | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable. It performs positively in the Sustainability Appraisal, particularly in relation to access to services and public transport. The site supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. This is a brownfield site and development will contribute towards wider regeneration of the area.                                                                                                                                                                                                      |
| 10995    | West Bergholt Allocations        | West Bergholt | Residential                | No                                  | <b>Reason for discounting:</b> This site forms part of an allocation in the West Bergholt Neighbourhood Plan (made October 2019) for 120 dwellings. There is no additional development potential for this site.                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 10996    | Former Lookers Garage            | Colchester    | Residential                | No                                  | <b>Reason for discounting:</b> The site is not taken forward as an allocation as it has planning consent and is included in the trajectory as a commitment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 10997    | Former Coldoc Site 2             | Colchester    | Residential and commercial | Yes – as OA1                        | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable. The site performs positively in the Sustainability Appraisal, particularly in relation to accessibility to services, public                                                                                                                                                                                                                                                                                                                                                                                                                               |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                         | Settlement | Proposed use                                                                         | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------|-----------------------------------|------------|--------------------------------------------------------------------------------------|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                   |            |                                                                                      |                                     | transport provision and access to employment opportunities, reflecting the site's sustainable location. The site supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. This is a brownfield site and development will contribute towards wider regeneration of the area.                                                                                                                                                                                                                                                                                                                                           |
| 11006    | Land south Cycle Racing Facility  | Colchester | Residential                                                                          | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services when compared against alternatives. The site is constrained by the existing use as part of the operational successful sports park. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                          |
| 11007    | Site East of P&R                  | Colchester | Residential                                                                          | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services when compared against alternatives. The site is constrained by the existing use as part of the operational successful sports park. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                          |
| 11008    | Land West Severalls Lane          | Colchester | Residential                                                                          | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                         |
| 11016    | Colchester Water Recycling Centre | Colchester | Infrastructure associated with Anglia Water's sewerage and water supply undertakings | Yes – under Policy NZ3              | <b>Reason for allocating:</b> The site was put forward by Anglian Water. It represents planned infrastructure which is anticipated to be delivered. Being shown as an allocation demonstrates the commitment for this planned expansion.                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 11113    | Swan Grove, Chappel               | Chappel    | Residential                                                                          | Yes – as PP27                       | <b>Reason for allocating:</b> The site is allocated in the adopted local plan and is considered to remain a logical extension to Chappel and an appropriate location for development in the village. Development would support the spatial strategy by directing growth to sustainable locations.                                                                                                                                                                                                                                                                                                                                                                         |
| 11512    | High Street/Chappel Road          | Great Tey  | Residential                                                                          | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                        |
| 11536    | Land off Mersea Road Langenhoe    | Langenhoe  | Residential                                                                          | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                        |
| 11755    | Land South Colchester Road        | Colchester | Residential                                                                          | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement compared to the alternatives and would not contribute towards meeting the neighbourhood plan strategy. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                      |
| 12135    | Manor Road                        | Colchester | Residential                                                                          | Yes                                 | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. The site forms part of a larger allocation adjacent to a site allocated in the neighbourhood plan. This site combined with adjacent land forms a logical extension to the settlement and neighbourhood plan allocation when compared against alternatives. It continues growth in the direction consistent with the NHP strategy for growth supported by the Parish Council. |
| 12136    | Stanway Nurseries                 | Colchester | Commercial                                                                           | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. Part of the site is subject to flood risk. Existing use of part of the site is commercial.                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 12138    | Mill Race, Aldham                 | Aldham     | Commercial                                                                           | Yes – as PEP15                      | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. Development of brownfield site                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                                                                     | Settlement    | Proposed use  | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------|-------------------------------------------------------------------------------|---------------|---------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12145    | Land west of Marks Tey Rail Station (North East of PP18) - Colliers Brickyard | Marks Tey     | Residential   | Yes – as OA5                        | <b>Reason for allocating:</b> A Marks Tey Growth Area as Policy OA5 is included in the Submission Plan. This replaces PP17 and PP18 and provides a wider growth area policy for the combined wider area to deliver homes, jobs, open space and community infrastructure. Some / all of this site is included in the Growth area. It is intended to deliver a mix of uses which includes housing, employment, infrastructure, significant open space. The exact uses on this site within the growth area will be informed by masterplanning.                                                                                                                                                                                                                                                                             |
| 12618    | Nightingale corner                                                            | Colchester    | Residential   | Yes – as PP40                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations. The allocation of this site includes land directly to the south, which was included as a Preferred Options allocation.                                                                                                                                                                                                                                                                                                                                                                                                      |
| 12856    | Land south of Tower Business Park                                             | Tiptree       | Employment    | Yes – reduced site as PEP16         | <b>Reason for allocating:</b> The part of the site allocated forms a logical extension to the existing employment area adjacent to existing buildings. The part of the site excluded is of a different character, greenfield encroaching into countryside                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 12932    | Land South Colchester Road                                                    | Colchester    | Residential   | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement compared to the alternatives and would not contribute towards meeting the neighbourhood plan strategy. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 13110    | Lexden Wood Golf Club                                                         | Colchester    | Leisure       | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered that a standalone policy is needed for the proposal for this site, described in the representation as an underperforming private leisure facility. Numerous policies in the plan would be used to consider proposals for an improved and extended leisure facility at this location. On this basis, the site is not considered justified for allocation with a standalone leisure/ commercial policy.                                                                                                                                                                                                                                                                                                                              |
| 13121    | Land of Spring Lane                                                           | Colchester    | Park and ride | No                                  | <b>Reason for discounting:</b> The transport evidence identifies the need for measures to support sustainable transport modes which may include park and ride provision. Additional consideration to the comprehensive city-wide approach to this will help determine the most appropriate location for facilities such as this.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 13158    | Valley Crescent, West Bergholt                                                | West Bergholt | Residential   | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is considered more separate and detached from facilities and services when compared against alternatives. The preferred sites, which further extend the neighbourhood plan site allocations are more favourable and capable of delivering an appropriate level of growth for West Bergholt over the plan period. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                 |
| 13209    | Land North of Axial Way, Colchester                                           | Colchester    | Employment    | Yes – as OA4                        | <b>Reason for allocating:</b> The site is adjacent to existing employment land bound to the south by Axial way. It forms a logical extension to the employment area and is consistent with the wider policy area cover by Policy OA4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 13280    | Oxley House, Abberton                                                         | Abberton      | Residential   | No                                  | <b>Reason for discounting:</b> The site is not taken forward as the alternative allocated site is preferable in terms of being a logical extension and an appropriate scale for the village. Furthermore, the site is constrained by trees, which would be difficult to retain including retention of the orchard priority habitat. There are also potential wider landscape impacts. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                               |
| 13620    | Land east of Queensbury Avenue                                                | Copford       | Residential   | Yes – as PP29c                      | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. It is an allocation in the adopted local plan The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 13905    | Land East of Harwich Road, Colchester                                         | Colchester    | Residential   | Yes – as PP9                        | <b>Reason for allocating:</b> Development of adjacent sites would deliver substantial new development on the edge of Colchester, which is at the top of the spatial hierarchy. The site is well related to the built form and provides good access to key services and infrastructure. The combined sites which make up this strategic allocation have been identified through the SLAA as suitable, available and achievable, and have been promoted by landowners with evidence of landowners working together. The Sustainability Appraisal identifies a range of both positive and negative effects. While the site performs well in terms of accessibility to services and employment, it also gives rise to adverse effects in relation to landscape and biodiversity. Development will be required to be planned |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                          | Settlement      | Proposed use | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------|------------------------------------|-----------------|--------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                    |                 |              |                                     | comprehensively to mitigate harm and maximise the benefits. Biodiversity harm due to proximity to designated sites can be mitigated through provision of a buffer to the SSSI and LoWS & discussions have taken place with Natural England. The sites area habitats are of low biodiversity value (although the hedgerows and watercourse are of high value) and negative impacts in terms of wildlife connectivity are mitigable. The combined site would have the potential to deliver significant ecological enhancement, including improved connectivity between the SSSI, LoWS & new SANG.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 13977    | Mersea Road                        | Colchester      | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as the alternative allocated site is preferable in terms of being a logical extension and an appropriate scale for the village. The scale of development proposed is not considered appropriate for Abberton and Langenhoe. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 14009    | 18 Bakers Lane                     | Colchester      | Residential  | Yes – as PP7                        | <b>Reason for allocating:</b> Colchester city is the top of the spatial hierarchy and the location of this site is on the edge of the existing urban area. The site has a DfT Connectivity score of 42-51 - higher than many of the site allocations. This is a small site but combined with the adjacent site, which was promoted in the call for sites and included as a Preferred Options allocation, provides a larger site with potential to create better pedestrian connectivity to services in Colchester. The potential impacts to the SAM and LoWS can be mitigated and policy safeguards, including a requirement for a buffer, are included in the policy informed by evidence in the LoWS Review, Biodiversity Assessment and HIA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 14040    | Shaws Farm                         | Colchester      | Residential  | Yes – as PP9                        | <b>Reason for allocating:</b> Development of adjacent sites would deliver substantial new development on the edge of Colchester, which is at the top of the spatial hierarchy. The site is well related to the built form and provides good access to key services and infrastructure. The combined sites which make up this strategic allocation have been identified through the SLAA as suitable, available and achievable, and have been promoted by landowners with evidence of landowners working together. The Sustainability Appraisal identifies a range of both positive and negative effects. While the site performs well in terms of accessibility to services and employment, it also gives rise to adverse effects in relation to landscape and biodiversity. Development will be required to be planned comprehensively to mitigate harm and maximise the benefits. Biodiversity harm due to proximity to designated sites can be mitigated through provision of a buffer to the SSSI and LoWS & discussions have taken place with Natural England. The sites area habitats are of low biodiversity value (although the hedgerows and watercourse are of high value) and negative impacts in terms of wildlife connectivity are mitigable. The combined site would have the potential to deliver significant ecological enhancement, including improved connectivity between the SSSI, LoWS & new SANG. |
| 14051    | Packards Lane, Wormingford         | Wormingford     | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 14054    | Land at Brook Hall Farm, Tiptree   | Tiptree         | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement and has constraints. Development of the site would harm the character of the edge of the settlement and reduce the gap between Tiptree and Tolleshunt Knights. The site would not contribute towards the strategy in the neighbourhood plan. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 14065    | Land South of Old House Road       | Great Horkesley | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 14067    | Riverside Office Block, Colchester | Colchester      | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as an allocation as it included in the trajectory as a commitment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 14073    | Land East of Warren Lane           | Colchester      | Employment   | No                                  | <b>Reason for discounting:</b> This site is not taken forward. As evidenced in the Employment study the quantum of land is not required to meet demand. Alternative sites perform more favourably                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

**Appendix E** Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name                                                    | Settlement      | Proposed use | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------|--------------------------------------------------------------|-----------------|--------------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 14079    | Land North of Birchwood Road                                 | Colchester      | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                   |
| 14134    | Chapel Farm, Fordham                                         | Fordham         | Residential  | No                                  | <b>Reason for discounting:</b> The site is not taken forward as it is not considered to be a logical extension to the existing settlement. The site is considered more separate and detached from facilities and services, when compared against alternatives. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                   |
| 14145    | Drury Meadows - Land East of Layer Road, Colchester          | Colchester      | Residential  | No                                  | <b>Reason for discounting:</b> The site is an area of established open space. The Local Plan seeks to protect and enhance the green infrastructure network. Allocating an area of open space would be contrary to this approach. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                                                                 |
| 14146    | Montgomery Estate - Land South of Baronswood Way, Colchester | Colchester      | Residential  | No                                  | <b>Reason for discounting:</b> The site includes an area of established open space. The Local Plan seeks to protect and enhance the green infrastructure network. Allocating an area of open space would be contrary to this approach. The site is constrained by trees onsite. On this basis, the site is not considered justified for allocation.                                                                                                                                                                                                                                  |
| 14290    | Land North of Coach Road                                     | Great Horkesley | Residential  | Yes - as PP34                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. This site, combined with adjacent sites, would deliver comprehensive development in the village, providing enhanced open space and better pedestrian connections and community infrastructure. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations.                                                                                          |
| 14306    | School road, Copford                                         | Copford         | Residential  | Yes - PP29a                         | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement, supporting the spatial strategy by directing growth to sustainable locations. Development will deliver community infrastructure and enhanced open space. While there are identified constraints relating to increased recreational disturbance to Pit Woods LoWS, these are considered capable of mitigation through the provision of buffers and enhanced open space. |
| 14348    | Church Lane, Marks Tey                                       | Marks Tey       | Residential  | Yes – as OA5                        | Reason for allocating: A Marks Tey Growth Area as Policy OA5 is included in the Submission Plan. This replaces PP17 and PP18 and provides a wider growth area policy for the combined wider area to deliver homes, jobs, open space and community infrastructure. Some / all of this site is included in the Growth area. It is intended to deliver a mix of uses which includes housing, employment, infrastructure, significant open space. The exact uses on this site within the growth area will be informed by masterplanning.                                                 |
| 14542    | Berechurch Hall road                                         | Colchester      | Residential  | Yes – as PP55                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy.                                                                                                                                                                                                                                                        |
| No Ref   | Former Land Rover Site, Cowdray Avenue, Colchester           | Colchester      | Residential  | Yes – as PP51                       | <b>Reason for allocating:</b> This site is well-related to the existing settlement and supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. Allocating brownfield sites promotes efficient land use while protecting greenfield sites and supporting regeneration.                                                                                                                                                                                                                                                           |
| No Ref   | Land at Sheepen Place, Colchester                            | Colchester      | Residential  | Yes – as PP54                       | <b>Reason for allocating:</b> This site is well-related to the existing settlement and supports the spatial strategy by directing growth to Colchester City, which is top of the spatial hierarchy. Allocating brownfield sites promotes efficient land use while protecting greenfield sites and supporting regeneration.                                                                                                                                                                                                                                                           |
| No ref   | PP42 Extension                                               | West Bergholt   | Residential  | Yes – as PP42                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. The adjacent site is allocated in the neighbourhood plan and this site, which is extended from the Preferred Options, forms a logical extension to the settlement and                                                                                                                   |

**Appendix E**    Audit trail of decision making for site options considered for the Submission Draft Local Plan

| Site ref | Site name         | Settlement    | Proposed use | Is site included in the Local Plan? | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------|-------------------|---------------|--------------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                   |               |              |                                     | neighbourhood plan allocation when compared against alternatives. It continues growth in the direction consistent with the NHP strategy for growth supported by the Parish Council.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| No ref   | PP43 Extension    | West Bergholt | Residential  | Yes – as PP43                       | <b>Reason for allocating:</b> The site has been identified through the SLAA as suitable, available and achievable, and has been promoted by a landowner. The site is well-related to the existing settlement and supports the spatial strategy by directing growth to sustainable locations. The adjacent site is allocated in the neighbourhood plan and this site, which is extended from the Preferred Options, forms a logical extension to the settlement and neighbourhood plan allocation when compared against alternatives. It continues growth in the direction consistent with the NHP strategy for growth supported by the Parish Council. |
| PEP2     | Knowledge Gateway | Colchester    | Employment   | Yes – as PEP2                       | <b>Reason for allocating:</b> The site is safeguarded for employment use in the adopted Local Plan and identified in the Employment Study as continuing to be suitable and needed. It supports growth in the Research Park at the University of Essex.                                                                                                                                                                                                                                                                                                                                                                                                 |
| OA4      | Northern gateway  | Colchester    | Mixed use    | Yes – as OA4                        | <b>Reason for allocating:</b> This site is well-related to the existing settlement and supports the spatial strategy by directing growth to Colchester City Centre, which is top of the spatial hierarchy. The site is already safeguarded as a mixed use site in the Adopted Plan, but in the emerging plan the housing numbers on the site have increased, alongside taking in additional employment land (13209).                                                                                                                                                                                                                                   |

# References

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