



Local Plan

Focused Review

Consultation Statement – Draft Submission

Regulation 22 (1) (c) (v) & (d)

October 2013

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Focused Review of the Local Plan

Report on Proposed Submission Consultation and Summary of Main Issues Raised

1. Introduction

1.1 This Consultation Statement sets out how the process has met the requirements set out in the Council's Statement of Community Involvement (2013) and the requirements of Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. This Statement specifically addresses requirement (v):

if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations

1.2 This Consultation Statement is the second of two documents. It follows on from the 'Report on Issues and Options Public Consultation' (August 2013), which set out information relating to the Issues and Options (Regulation 18) consultation that took place between 18 March – 29 April 2013. That Report was made available alongside the draft Local Plan Focused Review document, for pre-submission consultation and is submitted as a separate submission document.

1.3 The comments received during the Issues and Options consultation directly influenced the production of the Proposed Submission Focused Review. This includes revisions to the centres and employment policies, which were not originally proposed for inclusion in the Focused Review at the Issues and Options stage.

1.4 This Statement forms part of the suite of 'submission documents' sent to the Secretary of State, via the Planning Inspectorate, for the formal examination of the Local Plan Focused Review.

2. Details of Consultation

2.1 The Regulation 19 consultation period for the Focused Review of the Local Plan Draft Submission Document ran from 5th August 2012 to 16th September 2013, inclusive. Consultation was carried out in accordance with the Council's Statement of Community Involvement. Letters and emails were sent to all those on the Council's consultation database, giving details of the consultation, including information on how and where to view copies of the consultation documents and inviting them to make representations. The consultation database contains contact details for the specific and general consultation bodies, as well as other interested parties, including residents and businesses. A list of all those consulted is included in Appendix 3.

2.2 Details of the consultation and copies of the consultation documents were made available on the Council's website, at the Central Library and at the Colchester Borough Council Customer Service Centre. A press release was also issued, and a copy of newspaper coverage is attached in Appendix 2.

- 2.3 In addition, the Council held two public workshops in the Town Hall on 4th and 10th September 2013; the first of these was held during the day and the second was held in the evening. A combined total of 17 people attended the workshops. The Council also held a Duty to Co-operate meeting with adjacent authorities, details of this are documented in the Council's Duty to Co-operate Statement.
- 2.4 Under Regulation 20, a total of 96 responses were received to the consultation, from 30 representors. Of these, 16 considered the Draft Submission Plan to be compliant/sound, 7 made general comments or no comments and 73 responses considered the Plan to be unsound. A summary of the responses is attached at Appendix 1, which includes hyperlinks to the original submission forms.

3. Issues Raised

- 3.1 This section sets out a summary of the main issues raised in representations, together with the Council's initial response under the three headings of duty to cooperate, legal compliance and soundness.
- 3.2 This summary only refers to the main issues raised by those who raised objections to the Council's proposals. It does not seek to address every issue raised in the responses, which are covered comprehensively in the summary of responses in Appendix 1. This includes those instances where the Council would be minded to make minor modifications to add clarity, subject to agreement by the Inspector. Further comments on issues raised during the consultation process will be made as needed, through the examination process.

Duty to Co-operate

- 3.3 No particular duty to co-operate issues were mentioned, although 25 responses considered the duty to co-operate requirement had not been met. These respondents also raised issues of soundness, so their concerns have been addressed in the Council's responses below to representations on soundness. The Duty to Co-operate statement, which has been submitted as a separate submission document, explains how the Council has met duty to co-operate requirements.

Legal Compliance

- 3.4 36 responses considered the legal compliance requirement had not been met. Since these 34 respondents also raised issues of soundness, and soundness is closely related to legal compliance, their concerns have been addressed in the Council's responses below to representations on soundness.

Soundness

- 3.5 The main issues raised in the pre-submission consultation in relation to soundness are considered to be:

General concerns regarding scope of Focused Review and the desire for a full review

- 3.5.1 Some objectors consider that the Council should proceed immediately to a Full Review of its policies. The Focused Review document, however, explains that

the Council is carrying out a two-stage exercise, with consultation on a new Local Plan to follow after the Focused Review. This is considered to provide an appropriate approach to both maintaining an up-to-date plan and to ensuring a comprehensive long-range review of evidence, policy and allocations.

Concerns over categories, designations and rankings within the spatial hierarchy

3.5.2 Several respondents raised objections to the hierarchy and designations contained within the Council's Centres and Employment Hierarchy, which the Council argues remains as an appropriate locally distinctive set of guidelines for the direction of new commercial development in the Borough.

Interpretations of how the sequential approach to Town Centre uses should be applied

3.5.3 There were objections to the approach advocated within the proposed text for CE1 which seeks to apply the sequential approach to the Council's centre hierarchy rather than applying this to development which are not in accordance with an existing centre. The Council, however, considers that it is compliant with the NPPF to require that main town centre uses should be directed in the first instance to its Town Centres, with the District Centres as the next sequentially preferable site.

Concerns over the criteria for considering proposals involving loss of employment land

3.5.4 Several objectors considered that the Council's criteria to be met in schemes involving the loss of employment land were too stringent and not compliant with the NPPF, however, the Council considers that they provide an appropriate balance between flexibility and safeguards for valued employment land.

A desire for greater flexibility in applying affordable housing requirements

3.5.5 Greater flexibility in the composition of affordable housing schemes was requested, along with greater scope for market housing in rural exception schemes. The Council, however, considers that its proposed wording for the Focused Review reflects an appropriate balance between increased flexibility and maximising the delivery of suitable affordable housing.

Alternative wording across a range of issues considered to better ensure compliance with the NPPF

3.5.6 The Council argues that the majority of further wording changes proposed by respondents should be rejected, given that it considers its plan to be sound and legally compliant. It has, however, highlighted at various points non-fundamental modifications it would be willing to make, subject to the Inspector's agreement, to address objector concerns and to clarify the Focused Review document.

3.6 A full summary of all the pre-submission consultation representations, together with the Council's initial responses as appropriate, is contained in Appendix 1.

Appendix 1 also contains hyperlinks to full copies of each of the representations made.

Appendix 1

Colchester Borough Council Focused Review of Local Plan Summary of Consultation Responses to Submission Document

1. Sound/No Comments/General Representations

- 1.1 The following representations consider the document to either be sound; they make no comment; or provide general observations. A CBC Initial Response is included where required

03/09 Essex and Suffolk Water

- 1.2 Note that while Colchester is supplied with water by Anglian Water Ltd, Essex and Suffolk Water operate large trunk mains in the borough that are strategic to the supply of their customers. They request that any plans for development in the area take into account the position of their trunk mains and plan to leave them unaffected.

09/21 Fenwick Limited

- 1.3 The owners of Williams and Griffins department store on the High Street are fully supportive of maintaining the sequential test set out in the NPPF that out-of-centre sites are not the preferred location for town centre uses. Fenwick endorses the Council's position that the town centre has ultimate priority in retail and leisure development and that it should desist from permitting further A1 usage in Urban District Centres that can be potentially very damaging to the town centre.

15/51 Deloitte for Universities Superannuation Scheme

- 1.4 The inclusion of the model national policy in SD1 (15/51) is supported. The changes to provide a more flexible approach to the protection of employment sites are supported in CE3 (15/54) and DP5 (15/53). The respondent supports the proposed additional text to CE1 (15/52) which states that the Council will take a flexible approach to proposals contributing to economic growth and job creation. The Council is encouraged not to exclude other uses such as retail which could equally contribute to sustainable development in the Enterprise Zones.

29/95 English Heritage

- 1.5 The changes proposed in the draft submission document are not considered to have significant implications for the historic environment. English Heritage would wish to discuss amendments to historic environment policies to encapsulate the language and nuances of the NPPF and the accompanying Guidance at the full review stage.

30/96 Environment Agency

- 1.6 The EA is pleased to note changes/additions to SD1, SD2 and DP1 in line with their recommendations and that their comments on DP3 and ER1 have been noted. The EA advised on the availability of three documents that could be used

to provide information and data to inform the evidence base for the Sustainability Appraisal and it is acknowledged CBC has noted these.

18/64 Essex County Council

- 1.7 Essex County Council welcomes the initiative of Colchester Borough to pursue a focused review to secure consistency of these policies with the NPPF and supports the proposed amendments to policy wording and the explanation text. The two stage process of reviewing the Colchester Borough Local Plan is supported. The County Council looks forward to engaging constructively, actively and on an on-going basis during the full review of the Local Plan, to ensure the continuation of a robust long-term strategy for the Borough that provides a reliable basis on which the County Council may plan future service provision and required community and physical infrastructure for which it is responsible.

21/68 Colchester Retail Business Association

- 1.8 The Council should undertake the necessary tests with absolute diligence and transparency when considering any proposed out of town retail development, or extensions to any existing sites, including any change of use applications, in line with the NPPF guidance to protect the town centre. Any 'new job' claims should be tested to ensure that they are genuinely new jobs and not merely job dispersals. Any new residential developments should be sustainable in terms of local jobs/employment and services rather than creating housing for residents who have to commute farther away.

23/73 Highways Agency

- 1.9 The HA do not have any comments to make on the content of the document. They will continue to work with CBC on the transport evidence base.

28/94 Office of Nuclear Regulation (ONR)

- 1.10 No comments on Colchester's Local Plan Consultation. When consulted on formal planning applications around nuclear sites, ONR will provide advice to Local Planning Authorities, where those planning applications meet with ONR's consultation criteria.

19/65 Tendring District Council

- 1.11 TDC is happy to support the changes proposed in the consultation document as they consider that these will bring the Core Strategy and Development Policies in line with the requirements of the National Planning Policy Framework. They look forward to working closely with the Council on other matters of cross-boundary significance as part of the plan making process, including housing, employment, transport, retail and environmental issues and where opportunities arise, will seek to commission or undertake any necessary studies and other technical work jointly.

Barton Willmore for Taylor Wimpey

24/74 Core Strategy Policy SD1

- 1.12 Proposed amendments are supported, in particular the references to taking a 'positive approach that reflects the presumption in favour of sustainable development' and ensuring that applications that accord with local planning policies are 'approved without delay'.

24/75 Core Strategy Policy H4

- 1.13 The proposed reduction in the affordable housing target from 35% to 20% is supported. The proposed reference to the requirement for viability appraisals, where affordable housing provision falls below the 20% target is also supported.

24/76 Core Strategy Policy H2

- 1.14 Support the removal of density targets.

24/77 Development Policy DP5

- 1.15 Support the revision to provide that employment sites will be safeguarded 'unless there is no reasonable prospect of a site being used for that purpose'.

27/93 Kelvedon Parish Council

- 1.16 Expressed concerns regarding much needed A12 upgrades and in particular the need for an additional slip road to take traffic from Tiptree onto the A12 thereby avoiding the need for such traffic to use Kelvedon and Feering.

13/46 Gladman Developments

- 1.17 The overall Focused Review approach is questioned, as the respondents consider that CBC should be expediting its Full Review to ensure that policy changes are justified, based on the most up-to-date evidence base and with the impacts of which have been considered in full. In general, however, Gladman were supportive of the proposed policy changes and made specific comments on the following policies:

Core Strategy Policy SD1

- 1.18 Gladman are pleased to note that the council have added in recognition of the key principles of the Framework. The Council need to ensure that policies in the plan don't conflict with this.

13/47 H2 and 13/48 H3

- 1.19 Gladman agrees in principle to changes proposed to Policy H2 and H3, but highlights the need to justify these policies changes with a robust evidence base. This demonstrates the requirement to conduct a single local plan review.

CBC Initial Response

- 1.20 The Council is developing a robust evidence base to support its Full Review of the Local Plan.

13/49 H4

- 1.21 The reduction in affordable site yield from 35% to 20% is supported should this be fully representative of the findings from the Council's Viability Assessment. They also question whether the impact of this policy change on the provision of affordable housing within the borough has been thoroughly assessed. The Council will need to ensure its Strategic Housing Market Assessment (SHMA) is fully compliant with national guidance and identifies the full need for housing before it considers undertaking any process of assessing the ability to deliver this figure.

CBC Initial Response

- 1.22 The reduction in the affordable housing target reflects the evidence base, including the findings of the Council's study into the effects of CIL on the affordable housing target.

11/30 Martin Robeson for Churchmanor Estates

Core Strategy Policy CE3

- 1.23 Support changes that bring the policy into line with the NPPF. (NB other aspects of the review considered to be unsound– see representations included in Unsound representations document)

Mersea Homes

01/03 H2 and 01/04 H3

- 1.24 Supports the removal of tables H2a and H3a
(NB other aspects of the review considered to be unsound– see representations included in Unsound representations document)

CPREssex

05/13 H6

- 1.25 Fully support
(NB other aspects of the review considered to be unsound– see representations included in Unsound representations document)

Summary of Unsound Responses and CBC Initial Response

General Issues

2. Scope of Review

06/14 Barton Willmore for Tollgate Partnership

- 2.1 A full review of the Development Plan should be undertaken immediately and not deferred to a later date. The exclusion of the Site Allocations DPD from this current review is questioned. The NPPF doesn't provide for a focussed review based on revising those policies that can be readily amended without an extensive evidence base. The weight to be given to non-reviewed policies should be clarified.

CBC Initial Response

- 2.2 The NPPF gives general guidance rather than detailed procedural requirements. It 'sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so.' (paragraph 1)
- 2.3 A Focused Review is considered to be an effective first stage response to requirements to achieve compliance with the NPPF. The selected policies can be reviewed without the need to prepare extensive evidence in respect of those specific policies. The approach adopted by the Council i.e. a two stage process beginning with a partial review, reflects the fact that the Council considers that vast majority of the Local Plan remains relevant and up to date. Where there is a limited inconsistency, the Council is seeking to address it. The second stage is the development of a new Local Plan, which will include amendments to the spatial strategy, housing and employment targets, and site allocations as these issues require the support of updated evidence base work.
- 2.4 It is agreed that the document would benefit from clarification on the weight to be given to non-reviewed policies. While not required for soundness or legal compliance reasons, the Council would be willing to amend the document as follows subject to the Inspector's agreement:
When adopted these amended policies will only replace the previous versions of these policies contained within the adopted Core Strategy and Development Control Policies Development Plan Document 2008. All other policies will remain unchanged until a new Local Plan is developed. The Council considers that the unamended policies accord with the National Planning Policy Framework and will carry full weight in the determination of planning applications. The unamended policies are not, however, to be tested for the purposes of the Focused Review Examination.
- 2.5 It is important to note that a number of appeal decisions made since the adoption of the NPPF have found that Colchester policies relevant to the appeal were in

accord with NPPF principles. (See for example appeals 2174934, 2189888 and 2194828)¹

13/45 Gladman Developments

2.6 The Focused Review approach is questioned, as the Council should be expediting its Full Review to ensure that policy changes are justified, based on the most up-to-date evidence base, the impacts of which have been considered in full. In general Gladman are supportive of the proposed policy changes, recommending a few minor modifications to ensure compliance. In order for these policies to be implemented effectively, however, changes must be based upon an up-to-date evidence base.

CBC Initial Response

2.7 The NPPF gives general guidance rather than detailed procedural requirements. It 'sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so.' (paragraph 1)

2.8 A Focused Review is considered to be an effective first stage response to requirements to achieve compliance with the NPPF. The selected policies can be reviewed without the need to prepare extensive evidence in respect of those specific policies. The approach adopted by the Council i.e. a two stage process beginning with a partial review, reflects the fact that the Council considers that vast majority of the Local Plan remains relevant and up to date. Where there is a limited inconsistency, the Council is seeking to address it. The second stage is the development of a new Local Plan, which will include amendments to the spatial strategy, housing and employment targets, and site allocations as these issues require the support of updated evidence base work.

22/69 Myland Community Council

2.9 Paragraph 1.2 needs to correctly reflect the NPPF's wording on its weight in determining planning application. The document should have reviewed further policies to reflect the importance of addressing climate change issues (ENV1 and DP20) and environmental issues (PR1, ENV1, DP10 and DP16).

¹ Appeal 2174934 (21 November 2012) concerning employment development in the countryside – the Inspector noted that the NPPF sets out that a positive approach to sustainable new development should be taken to support economic growth in rural areas. However pursuing sustainable development involves seeking positive improvements in the quality of the natural environment. CS Policies ENV1 and ENV2 reflect the terms of the Framework in this regard.

In appeal 2189888 (22 July 2013) the Inspector found that the proposal was contrary to both national guidance and the development plan policies to which the Council refers (SD1, TA1, ENV1).

In appeal 2194828 (26 April 2013) the Inspector found that local planning policies (in particular Core Strategy policies SD1, ENV1 and UR2 and Development Plan policies DP1, DP12 and DP13) sought to ensure high quality design which respects the character and appearance of the existing dwelling and the surrounding countryside. In this respect they are in accordance with the principles of the NPPF.

CBC Initial Response

- 2.10 Paragraph 1.2 of the Focussed Review explains that the NPPF is a material consideration in the preparation of Local Plans and, subject to the agreement of the Inspector, will be modified to clarify that the NPPF is also a material consideration (rather than guidance) in the determination of planning applications as follows: *The NPPF is a material consideration in the preparation of local plans (see section 19(2) of the Planning and Compulsory Act 2004) and ~~also provides guidance~~ in the determination of planning applications.* Planning law continues to require applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 2.11 The policies referred to by Myland Community Council are considered by the Council to be compliant with the NPPF; however these policies will be reviewed as part of the development of a new Local Plan, along with all other policies. This is a focused review and only those policies that can be readily amended to be consistent with the provisions of the NPPF, without the need to prepare further extensive evidence, have been amended.

26/79 Collins and Coward for Bunting & Sons

- 2.12 A full review of the plan should be undertaken by the council as a result of the publication of the NPPF and revocation of the East of England Regional Plan. This should include a review of the spatial strategy to deal with issues arising from the revocation of the regional plan.

CBC Initial Response

- 2.13 As explained in the background section of the pre-submission draft, the Council is carrying out a two stage process to review its Local Plan. Stage One is a focused review of the Core Strategy and Development Policies to revise those policies which are considered not to be quite up to date with the provisions of the NPPF. There is no need to prepare further extensive evidence in respect of those specific policies. Revisions do not include any amendments to the spatial strategy or housing and employment targets and allocations as this will be included in the second stage of developing a new Local Plan.
- 2.14 The NPPF requires that local authorities should 'identify and update, annually, a supply of specific deliverable sites sufficient to provide a five year supply of housing against their housing requirements with an additional buffer of 5%' and to 'identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15'. Our housing monitoring figures establish that the Council can demonstrate an adequate supply of housing land availability to meet the requirement to maintain a 5 and 10 year supply. There is also an additional 3 years worth of housing land. This means that a more fundamental review of policies and sites for large-scale development is not immediately required.

3. Backland and Infill Supplementary Planning Document

08/20 Marguerite Livingstone Associates

- 3.1 The Backland and Infill Supplementary Planning Document (SPD) conflicts with the objectives of the NPPF to promote sustainable development particularly

housing in town centres/urban areas and should be deleted from Council adopted policy.

CBC Initial Response

- 3.2 Where SPDs conflict with the NPPF, the NPPF will take precedence, unless the SPD provides evidence to demonstrate why the NPPF should not be the overriding policy consideration in any particular instance. A review of SPDs falls outside of the scope of the Focused Review; no change is considered necessary.
- 3.3 The Backland and Infill SPD provides useful detail to expand on the general guidance contained in Local Plan policies which the Council considers accord with the NPPF, in particular Development Policy DP1, Design and Amenity. The Backland and Infill SPD was considered compliant with the draft NPPF in 2011 by an Inspector considering an infill proposal in Tiptree. (Appeal decision 2151386)

4. Inclusion of Green Infrastructure Projects

16/55 Natural England

- 4.1 Since the NPPF states that local planning authorities should set out a strategic approach in their Local Plans to infrastructure, a number of green infrastructure projects are suggested that should be considered for inclusion within the plan.

CBC Initial Response

- 4.2 Colchester Borough Council adopted a Green Infrastructure Strategy in 2011. This was the result of considerable research and consultation with relevant stakeholders, including Natural England. The Strategy's objectives are to develop a green infrastructure network which responds to the existing sense of place; conserves and enhances green infrastructure assets and identifies opportunities for enhanced or new green infrastructure to increase the functional offer throughout the Borough. Policy ENV1 states that green infrastructure should be protected and enhanced and it is not considered that every green infrastructure project should be listed in the Local Plan. Development of the new Local Plan will provide an opportunity for further consideration of green infrastructure issues

5. Policies for the Elderly

17/58 CP Bigwood for Abberton Manor Developments Ltd.

- 5.1 No policies are focused on the needs of the elderly, including policies focused on the provision of accommodation for the 'elderly in need of care'. The review should provide allocations for the full range of residential accommodation.

CBC Initial Response

- 5.2 Adopted Local Plan policy addresses the needs of the elderly. Policy H3 Housing Diversity states that housing developments will need to contribute to the provision of homes that are suitable to the needs of older persons. The Council's Strategic Housing Market Assessment (SHMA) provides detailed information on the demand for housing for the elderly. The work suggested falls outside the scope of the Focused Review, but will form part of the Development of a new

Local Plan as it entails further evidence base work, including continuing updates to the SHMA.

6. Reference to Marine legislation

25/78 Marine Management Organisation

- 6.1 Reference should be included to the Marine and Coastal Access Act (2009), Marine Policy Statement, Marine Plan and Marine Licensing in paragraph 1.2 of the Background section and in Policy SD1.

CBC Initial Response

- 6.2 The Council accepts that the Focused Review should make reference to the UK Marine Policy Statement, introduced by the Marine and Coastal Access Act 2009 as this sets the national policy framework for marine spatial planning in coastal and tidal areas where no Marine Plan is in place.

Whilst the Focused Review is not considered to be unsound without it, subject to the Inspector's agreement, the Council would be minded to accept the addition of proposed new wording in paragraph 1.2 on page 5 to acknowledge that the UK Marine Policy Statement is a material consideration when developing plans and determining planning applications in coastal and estuarine areas as follows: *The NPPF is a material consideration in the preparation of local plans (see section 19(2) of the Planning and Compulsory Act 2004) and also provides guidance in the determination of planning applications. All National Policy Statements form part of the UK's national planning system. The Marine and Coastal Access Act 2009 introduced a new system of Marine Spatial Planning through which a UK Marine Policy Statement was developed. The Marine Policy Statement will guide the development of marine plans but where no marine plan exists the marine policy statement provides the policy framework for determining planning applications in coastal or estuarine areas.*

Comments on Specific Policies

Sustainable Development Policies

7. Core Strategy Policy SD1 Sustainable Development Locations

11/33 Churchmanor Estates

- 7.1 Objects as the policy continues to apply 'a sequential approach that gives a priority to accessible locations and previously developed land'. The NPPF instead explains that policies should 'encourage the effective use of land by re-using land that has not been previously developed'. The explanation to the amended policy should list the NPPF's footnote 9 examples of the types of designated areas where restrictions on development are appropriate to add clarity and avoid confusion as to the meaning of 'restricted'.

CBC Initial Response

- 7.2 Applying a sequential approach that gives priority to accessible locations and previously developed land is a sound planning principle that runs through the Local Plan. The core planning principle set out in the NPPF to 'encourage the

effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value' (paragraph 17) is not in conflict with this sequential approach. Whilst the housing allocations in the Plan do not form part of this review, the Council has demonstrated at previous Examinations and through its Annual Monitoring Reports that this sequential approach can deliver housing and employment to meet the needs of the Borough and therefore there is no justification to amend the policy.

- 7.3 The Council is satisfied that the policy as worded provides sufficient guidance as to the meaning of restricted development.

17/59 CP Bigwood for Abberton Manor Developments Ltd.

- 7.4 Whilst there is support for policy SD1, there needs to be a caveat in the policy whereby 'supporting' development proposals in a non-sustainable location could be acceptable where it has overwhelming and overriding planning benefits.

CBC Initial Response

- 7.5 Support for policy SD1 is welcomed. Policy SD1 has been amended to include the model policy in the NPPF and the whole policy on that basis is considered to now comply with the NPPF. The policy makes it clear that the Council will take a positive approach to development proposals, which reflects the presumption in favour of sustainable development. Whilst development is directed to the most sustainable and accessible locations in accordance with the NPPF, the Plan does recognise that support should be given to appropriate development proposals in rural areas. The Inspector for a recent appeal decision for a site in Colchester (Appeal Decision 2189888) noted, however, that the presumption in favour of sustainable development in the countryside needs to be applied carefully. The Inspector noted that the proposal in front of him for development in the countryside would fail the requirement to be sustainable because the appeal building was not appropriately located, being in the countryside, where travel to and from it would tend to rely on the use of the car.
- 7.6 Policies ENV2 (Rural Communities) and DP9 (Employment Uses in the Countryside) provide sufficient guidance in balancing considerations governing proposals for development in rural areas and therefore it is not necessary to amend policy SD1.

22/70 Myland Community Council

- 7.7 The NPPF states at paragraph 12 that LPAs should have an up-to-date Local Plan and as Colchester does not currently have one the presumption in favour comment is out of context. The proposed change to Policy SD1 should be deferred.

CBC Initial Response

- 7.8 The presumption in favour of sustainable development applies, regardless of whether or not an up-to-date plan is in place. The NPPF states that it is desirable that local planning authorities have an up-to-date plan in place. An up-to-date plan is desirable because it provides clarity and certainty. In CBC's case, it is considered that limited changes proposed as part of the Focused Review

process are sufficient to bring the plan up-to-date. The second stage of the updating process will be a development of a new Local Plan.

- 7.9 SD1 is necessarily proposed for amendment as part of the Focused Review process in order to incorporate the Planning Inspectorate's model policy, aimed at adequately reflecting the NPPF's presumption in favour of sustainable development.

26/80 Collins and Coward on behalf of Bunting and Sons

- 7.10 Needs revision to reflect paragraph 28 of the NPPF to ensure jobs and employment are encouraged and located in the countryside. Wording changes suggested including allowing growth to be located in appropriate rural locations in addition to locations in accordance with the Settlement Hierarchy. Sentence directing development in Colchester Town to Town Centre and Growth Areas should be amended to read development *in urban area of Colchester Town*.

CBC Initial Response

- 7.11 Policy SD1 makes it clear that the Council will take a positive approach to development proposals, which reflects the presumption in favour of sustainable development, in accordance with the NPPF. Whilst development is directed to the most sustainable and accessible locations in accordance with the NPPF, the Plan does recognise that support should be given to appropriate development proposals in rural areas. The Inspector for a recent appeal decision for a site in Colchester (Appeal Decision 2189888) noted, however, that the presumption in favour of sustainable development in the countryside needs to be applied carefully. The Inspector noted that the proposal in front of him for development in the countryside would fail the requirement to be sustainable because the appeal building was not appropriately located, being in the countryside, where travel to and from it would tend to rely on the use of the car.
- 7.12 Policies ENV2 (Rural Communities) and DP9 (Employment Uses in the Countryside) provide sufficient guidance in balancing considerations governing proposals for development in rural areas and therefore it is not necessary to amend policy SD1.

8. Core Strategy SD2 Delivering Facilities and Infrastructure

11/34 Martin Robeson for Churchmanor Estates

- 8.1 The explanation to Policy SD2 needs to make explicit that without an overall approach to the delivery of infrastructure in the growth area, the Spatial Strategy is at risk of failure. In such circumstances, Section 106 payments must not, in the policy text, be restricted to 'site-specific' infrastructure. The Explanation must be explicit that in growth areas 'acceptable in planning terms' relates to the importance of overall delivery and the tests for the reasonableness of Section 106 payments should be seen in the cumulative 'collection' context that underlies the delivery of the key sustainable growth areas. The policy text should be clarified by deleting 'also known as' in paragraph 3 and replaced with 'usually contained within' since a Section 106 agreement is merely the mechanism for delivering an obligation. It is a concern that the Sustainability Appraisal has not

considered the option of using the present opportunity to incorporate a CIL charging schedule into the plan making process.

CBC initial response

- 8.2 Whilst the proposed wording of Policy SD2 and its explanation is considered sound and legally compliant, the Council would, subject to the Inspector's agreement, be willing to amend the text of SD2 as follows to clarify the use of Section 106 payments: (additional new wording in bold and deleted text shown with double strikethrough)

Policy SD2

First 2 paragraphs – no change

*The Council will seek to ~~employ standard charges where appropriate~~ to ensure that new development makes a reasonable contribution to the provision of related facilities and infrastructure. This will either be through a planning obligation (~~also known as~~ **usually contained within** a Section 106 agreement) **and/or**, if applicable, ~~and together with a planning obligation~~, through a Community Infrastructure Levy (CIL) payment, following adoption of a CIL charging schedule.*

*A CIL charging schedule would set a specified charge for each square metre of gross internal floorspace, related to the use class of the development. CIL payments will contribute to the provision of ~~strategic~~ infrastructure **to support development. Planning obligations and s278 agreements will continue to be used to make individual applications acceptable.** The Council will publish a list of infrastructure to be funded through CIL to ensure developers do not pay twice for the same item of infrastructure. ; ~~and Section 106 payments will contribute to site-specific infrastructure. The tariff approach will be based on a comprehensive review of the need, timing and scale of investment and how this relates to the key growth areas set out in the Core Strategy. The viability of developments will also be considered when determining the extent and priority of development contributions.~~*

- 8.3 Additionally, the Council would be willing to amend the text of paragraph three, policy SD2 as proposed, from 'also known as' to 'usually contained within' subject to agreement by the Inspector.
- 8.4 It is not considered to be the role of the Sustainability Appraisal to assess the merits of incorporating a CIL charging schedule into the plan making process at the present time. It is for the Council to decide if and when to introduce a Community Infrastructure Levy. CBC does not consider the implementation of a CIL charging schedule to be an appropriate course of action at this time and this decision is outside the scope of Focused Review process. It therefore does not constitute a genuine option for appraisal.

14/50 Anglian Water

- 8.5 Policy is needed to ensure necessary waste water infrastructure to serve allocations is planned (and in place) before development proceeds. Anglian Water would at planning consent stage request the use of appropriate conditions

to ensure infrastructure is in place before development is connected to the public system. Revised wording to the policy is provided which notes that 'necessary drainage infrastructure will be in place before development proceeds'.

CBC Initial Response

- 8.6 Anglian Water have requested the amendment to policy SD2 principally because waste water and sewage treatment infrastructure is funded through provisions in The Water Act and Anglian Water's 5 yearly business plans. The current wording implies that waste water and sewage treatment will be funded through CIL or Sections 106 contributions which is inaccurate. The text to be deleted was added into policy SD2 following a request by the Environment Agency in the response to the Focused Review Local Plan Issues an Options consultation. The Environment Agency now supports the further revision to SD2 to remove the wording.
- 8.7 Subject to the Inspector's agreement, the Council would be minded to accept the deletion of the text paragraph 2 of policy SD2 for clarity about what can be funded through CIL or Section 106 contributions as follows: *New development will be required to provide the necessary community facilities, ~~provision of waste water treatment plant and sewer network~~, open space, transport infrastructure and other requirements to meet the community needs arising from the proposal.*
- 8.8 The Council do not think it is necessary to include the additional text proposed by Anglian Water to Policy SD2 as this issue is adequately covered in paragraph 4.11 of the adopted Site Allocations DPD and again in policies STA1 and TIP1. If however the Inspector is mindful to accept the new text it could be added into policy SD2 or the supporting text. The change could improve the clarity of the document in relation to the need for necessary drainage infrastructure to be in place prior to development proceeding but it is not required for soundness or legal compliance reasons.
- 8.9 Subject to the Inspector's agreement, the Council would be minded to accept the deletion of text paragraph 2 of policy SD2 for clarity about what can be funded through CIL or Section 106 contributions.

9. Core Strategy Policy SD3 – Community Facilities and Development Policy DP4 Community Facilities

[17/60 SD3 and 17/61 DP4 CP Bigwood for Abberton Manor Developments Ltd.](#)

- 9.1 An explanation/definition of community facilities should be included.

CBC Initial response

- 9.2 Paragraph 3.11 of the explanatory text to Policy DP4 includes a list of the types of buildings and sites that can be classed as community facilities. The list included in DP4 is not inclusive merely indicative about what could be classed as a community facility. The current approach in DP4 is not considered to conflict with the NPPF (paragraph 74) in terms of soundness or legal compliance, therefore the Council suggests that there is no need to make any further amendments policy DP4 beyond those proposed as part of the Focused Review.

The Council is proposing that the definition of community facilities is reviewed as part of the development of the new Local Plan for Colchester supported by fresh evidence where necessary.

20/66 SD3 and 20/67 DP4 Theatres Trust

- 9.3 They support the first paragraph of the policy as it will retain and enhance existing facilities in line with NPPF paragraph 70. They are concerned, however, with the interpretation of the term 'community facilities' in the glossary because it does not include the word 'cultural' and the examples given exclude many other venues and buildings that would be relevant. Rather than having a long list of examples of community facilities which cannot be comprehensive they suggest the following all-inclusive description – 'community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community'.

CBC Initial Response

- 9.4 The inclusion of the definition proposed by the Theatres Trust in the glossary would create inconsistencies with policy DP 4 (and the adopted Community Facilities SPD) and require further amendments to policy DP4. Policy DP4 and the SPD both include lists of the types of buildings and sites that can be classed as community facilities. The list included in DP4 is not inclusive merely indicative about what could be classed as a community facility. As the current approach in DP4 does not conflict with the NPPF (paragraph 74) in terms of soundness or legal compliance, the Council suggests that there is no need to amend policy DP4 or add a new definition into the glossary as part of the Focused Review. The Council feel that it would be more appropriate to review the definition of community facilities as part of the development of the new Local Plan for Colchester supported by new evidence where necessary.

04/10 DP4 Wivenhoe Society

- 9.5 The suggested rewording policy of DP4 gives weaker protection to community facilities. Paragraph 74 of the NPPF is more strongly worded in favour of protecting facilities. The current wording should be retained to accord with the NPPF.

CBC Initial Response

- 9.6 The amendments proposed to policy DP4 are not considered to weaken the protection given to community facilities. The criteria in policy DP4 are considered to fully accord with the criteria included in paragraph 74 of the NPPF.
- 9.7 Paragraph 3.11 of the explanatory text to Policy DP4 and the Community Facilities SPD both include a list of examples of the types of buildings and sites that can be classed as community facilities. These lists are not mean to be exclusive, merely indicative about what could be classed as a community facility. The current approach in DP4 does not conflict with the NPPF (paragraph 74) in terms of soundness or legal compliance, therefore the Council suggests that there is no need to make any additional amendments to policy DP4. The Council suggests that it is more appropriate to review the definition of community facilities during the development of the new Local Plan for Colchester supported by fresh evidence where necessary.

10. Development Policy DP2 Health Assessments **(Not proposed for revision as part of the Focused Review)**

11/36 Martin Robeson for Churchmanor Estates

10.1 The policy is inconsistent with paragraphs 69-78 of the NPPF on Promoting Healthy Communities.

CBC Initial Response

10.2 Policy DP2 has not been amended as part of the Focussed Review as its current issues were not considered to raise any issues of compliance with the NPPF. The aim of paragraphs 69-78 of the NPPF is 'Promoting Healthy Communities', this section highlights the importance of the role of planning in facilitating social interaction and creating healthy, inclusive communities. In accordance with the NPPF, Policy DP2 helps to ensure that developments play an appropriate role in promoting and facilitating healthy communities.

11. Development Policy DP3 Planning Obligations

11/39 Martin Robeson for Churchmanor Estates

11.1 They refer to their representations on policy SD2. The policy needs to be more specific about how 'key infrastructure projects' are to be delivered. There needs to be a collaborative approach to the collection of appropriate funding to deal with the key infrastructure requirements that pave the way to the delivery of growth areas. The explanation for the policy needs to address these issues in the same way as proposed changes to SD2 so that it is not constrained by 'standard charges that will be applied to new development' and other criteria that would not apply to growth areas.

CBC Initial Response

11.2 It is considered that Policy DP3 as proposed is sound and legally compliant, but subject to the Inspector's agreement it is agreed that clarity and consistency with Policy SD2 would be enhanced if the wording on planning obligations was changed as follows:

*In addition to a CIL payment, developments will be expected to address infrastructure ~~site-specific~~ requirements **directly related to the development**, including affordable housing, through provision on site or through a Section 106 contribution.*

Centres and Employment Policies

12 Core Strategy Policy CE1 – Centres and Employment Classification and Hierarchy

01/01 Mersea Homes

12.1 Page 21 final paragraph – change second sentence to say 'Urban District Centres will normally support the significant residential development taking place unless specific masterplanning dictates otherwise e.g. the NGAUE SPD'. Modification considered necessary as UDCs may be too far away from new development and unable to expand to meet need.

CBC Initial Response

- 12.2 Proposed wording is considered to adequately cover the general principle concerning the role of Urban District Centres in supporting adjacent residential areas. Exceptions would need to be justified on a case by case basis.

05/11 CPREssex

- 12.3 Do not consider the inclusion of the Northern Gateway for commercial development is sound if it involves commercial development north of the Northern Bypass into the open countryside.

CBC Initial Response

- 12.4 The Council agrees that the A12 forms a clear boundary to the urban area of Colchester and would not support new commercial allocations north of that boundary. The opening of the Park and Ride facility in 2014 will, however, open up opportunities for sustainable new development south of the A12 and it is on that basis that the Northern Gateway has been included in the list of Edge of Centre and other Accessible Locations.

06/15 Barton Willmore for Tollgate Partnership

- 12.5 Generally support the increased flexibility added to the policy, but continue to object to the centres classification and hierarchy at Table CE1a. Edge of Centre locations should not be included as a valid definition in terms of the NPPF. The supporting text then wrongly applies the sequential approach, effectively treating sites within Urban District Centres as edge or out of centre locations.

CBC Initial Response

- 12.6 The NPPF provides that councils can 'produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities' (Paragraph 1). It also provides that councils should 'define a network and hierarchy of centres that is resilient to anticipated future economic changes' (Paragraph 23). The local circumstances of Colchester are accordingly considered to provide justification for a spatial hierarchy that includes Edge of Centre locations as an appropriate location for new development within a sequential approach. Any potential alterations to this approach will be considered as part of the development of a new Local Plan, which will include updates for the Council's employment evidence base.

10/22 Bidwells for Schroder UK Property Fund

- 12.7 Objects to the approach advocated within the proposed text for CE1 which seeks to apply the sequential approach to the Council's centre hierarchy rather than applying this to developments which are not in accordance with an existing centre. The NPPF, however, makes it clear that District and Local Centres are also legitimate locations for main town centre uses providing they are of a scale and nature that reflects the position of the centre within the centre hierarchy for the area. The respondents consider that office and mixed use development should be considered within 300 metres of Urban Gateways and Urban District Centres rather than 500 metres. Not considered clear whether text revising the approach to the sequential test is considered to form part of the Policy itself. The text should be incorporated within a coloured box in line with the rest of the

Policy text in order to provide clarity to its interpretation. Alternative wording is provided which is considered to ensure that the sequential test is applied in a manner which is in accordance with the NPPF.

CBC Initial Response

- 12.8 The wider criticism of the Council's approach is not accepted since a hierarchy by definition implies some differentiation and ranking between uses and centres. Given that the NPPF supports the development of a 'network and hierarchy of centres' (Paragraph 23) it is considered appropriate to provide general guidance noting that the 'use and scale of developments' will need to have regard to 'the accessibility and role' of the various centres in Colchester. This is considered to include providing that main town centre uses should be directed in the first instance to its Town Centres, with the District Centres as the next sequentially preferable site.
- 12.9 The Council does not agree that reference to 'sites on the edge of the Urban Gateways and Urban District Centres' should be a specific part of the sequential approach, given that they are not within designated centres.
- 12.10 Revising the policy to provide that office and mixed use development should be considered within 300 metres of Urban Gateways and Urban District Centres rather than 500 metres would conflict with NPPF advice in the definition of Edge of centre. While this provides that most main town centre uses should be within 300 metres, it provides more flexibility for office uses and states that 'For office development this includes locations outside the town centre but within 500 metres of a public transport interchange.'

11/29 Martin Robeson for Churchmanor Estates

- 12.11 The Urban Gateway designation is not defined in the National Planning Policy Framework. Paragraph 23 of the Framework explains the correct approach to the allocation of sites, with a 'well connected' edge of centre site preferred over one in an 'other accessible location'. They should not be treated as equals. It is inconsistent for Urban Gateways to appear in Table CE1a's hierarchy and classification of 'Centre Type' above 'District Centres'. 'Urban Gateways' should instead be positioned as an 'other accessible location' below 'edge of centre' locations which itself needs to be placed immediately below District Centres. Several amendments to the text should be made to correctly position Urban Gateways, and the definition of them should be amended so it is clear they are not 'next in preference to Town Centres'. The references to 'local shops' in the Classification in Table CE1a and in the last paragraph in page 21 need to be removed to be consistent with the deletion of policy text in CE2c- Local Centres.

CBC Initial Response

- 12.12 The lack of a definition of a category such as Urban Gateways in the National Planning Policy Framework does not preclude the use of the term, given that the principles of localism support flexibility in approach. The NPPF (Paragraph 23) directs local authorities to 'define a network and hierarchy of centres' but does not prescribe the categories within these networks and hierarchies. The approach taken by Colchester is intended to highlight that Urban Gateways, with their good transport connections, are a sustainable location for development

along with Urban District Centres. In practice, this means that applications for UDCs and Urban Gateways would need to discount town centre locations to address the sequential approach but not to discount each other. This is considered to provide flexibility in line with the NPPF and to be made clear by the wording of the sentence 'proposals for main town centre uses should be located in the town centre....and then to Urban Gateways and Urban District Centres.'

- 12.13 Subject to the Inspector's agreement, the Council would be willing to delete the reference to 'local shops' in the Classification in Table CE1a and the last paragraph on page 21 to ensure clarity and consistency. This minor change is not considered to raise issues of the overall soundness or legal compliance of the plan.

12/42 Andrew Martin Planning for Thomas Bates & Son Limited

- 12.14 Generally the draft revisions to CE1, CE3 and DP5 together with the explanatory text take a more rigid stance than the NPPF in that in such cases where there is no reasonable prospect of an existing employment site being used for that purpose, the document seeks to secure other commercial uses, rather than alternative uses of land or buildings to be treated on their merits. Further revisions are suggested which are considered to bring the policy in accord with paragraph 22 of the NPPF as follows:

- 12.15 Delete sentence from penultimate paragraph and replace with 'Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable communities'.

CBC Initial Response

- 12.16 The suggested NPPF extract has already been incorporated into the proposed wording for Policy CE3, and it is not considered necessary to repeat it twice. The existing wording is considered to be reasonable in requiring evidence to demonstrate that there is no reasonable prospect of a site being used for the allocated employment use.

26/82 Collins and Coward for Bunting and Sons

- 12.17 The very limited review of CE1 suggested by the Council does not meet the requirements to ensure compliance with the NPPF and revocation of the Regional Plan. Wording changes provided as follows:
- add support for rural employment, tourism and leisure developments.
 - larger scale development should be focused on rural locations as well as the Town Centre, Urban Gateways and Strategic Employment Sites.
 - references to rural development being acceptable if small scale should be removed.

CBC Initial Response

- 12.18 The Council has revised the policy to provide greater flexibility, but the respondent's proposed wording is not considered to give sufficient weight to ensuring proposals are compatible with the Spatial Hierarchy and with the requirement to safeguard the countryside contained in both Colchester Local

Plan policies and the NPPF. (See paragraph 109 which states that the planning system should protect and enhance the natural and local environment).

13. Core Strategy Policy CE2a Town Centre **(Not proposed for revision as part of the Focused Review)**

11/26 Martin Robeson for Churchmanor Estates

13.1 The policy should be amended by the movement of text relating to Urban Gateways into a separate policy following CE2c. (Further to changes proposed to Policy CE1).

CBC Initial Response

13.2 The lack of a definition of a category such as Urban Gateways in the National Planning Policy Framework does not preclude the use of the term, given that the principles of localism support flexibility in approach. The NPPF (paragraph 23) directs local authorities to 'define a network and hierarchy of centres' but does not prescribe the categories within these networks and hierarchies. The approach taken by Colchester is intended to highlight that Urban Gateways, with their good transport connections, are a sustainable location for development along with Urban District Centres. In practice, this means that applications for UDCs and Urban Gateways would need to discount town centre locations to address the sequential approach but not to discount each other. This is considered to provide flexibility in line with the 12.3 NPPF and to be made clear by the wording of the sentence 'proposals for main town centre uses should be located in the town centre....and then to Urban Gateways and Urban District Centres.'

14. Core Strategy Policy CE2b District Centres

06/16 Barton Willmore for Tollgate Partnership

14.1 Object to CE2b and concerned by the lack of support it lends to development within UDCs which is inconsistent with the NPPF. Developments within UDCs should not be governed by the requirement to submit a Retail Impact Assessment for proposals over 2500 sqm since the NPPF only intends that it should apply to proposals not within a defined retail centre. The criteria for evaluating proposals should be whether competition would have 'significant adverse impact' on defined centres', not just if it would compete.

CBC Initial Response

14.2 Given that Colchester's Centres and Employment hierarchy provides that Urban District Centres (UDCs) are less sequentially preferable to town centres, it is considered appropriate to require evidence that the location of larger town centre proposals in UDCs would not compromise the health and vitality of the town centre. The NPPF requirement for assessments in Paragraph 26 critically refers to 'town centres' rather than just 'centres' when stating that 'applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan' require an impact assessment' over an agreed threshold.

- 14.3 Policies for the Urban District Centres do not provide for additional retail, so policies to expand retail within an UDC would fall into the category of ‘not in accordance with an up-to-date Local Plan’. The development of a new Local Plan will provide an opportunity to reconsider the spatial hierarchy and the role of retail in different types of centres.

10/23 Bidwells for Schroder UK Property Fund

- 14.4 Object to the requirement that proposals for retail uses within Urban District Centres should provide evidence that they meet ‘identified local needs’. This is not considered to be consistent with the NPPF which does not include a ‘needs test’ and confirms that all centres are appropriate locations for main town centre uses. Alternative wording is provided to remove the requirement for new retail proposals over 2500 sqm in UDCs to be supported by evidence that they meet identified local needs and to refer to impact considerations rather than competition with the Town Centre.

CBC Initial Response

- 14.5 It is considered appropriate for District Centres to serve the local community where they are located, commensurate with their position in the hierarchy below town centres. The term is not defined precisely to allow for flexibility in how it could be met, as ‘meeting local needs’ could apply to a wide range of use classes, as well as to ensuring easy accessibility to the development.

11/38 Martin Robeson for Churchmanor Estates

- 14.6 The requirements for evidence to be provided for schemes over 2500m2 in District Centres is inconsistent with national policy and not justified, so the relevant text should be deleted.

CBC Initial Response

- 14.7 Given that Colchester’s Centres and Employment hierarchy provides that Urban District Centres (UDCs) are less sequentially preferable to town centres, it is considered appropriate to require evidence that the location of larger town centre proposals in UDCs would not compromise the health and vitality of the town centre. The NPPF requirement for assessments in Paragraph 26 critically refers to ‘town centres’ rather than just ‘centres’ when stating that ‘applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan’ require an impact assessment’ over an agreed threshold.

15. Core Strategy Policy CE2c Local Centres

01/02 Mersea Homes

- 15.1 The words ‘small scale shops’ needs to be deleted as the term is restrictive and contrary to the NPPF

CBC Initial Response

- 15.2 The use of ‘small scale’ in this context is considered appropriate given that Neighbourhood Centres are intended to provide for local catchment areas. The NPPF (paragraph 23) provides that local planning authorities should ‘define a

network and hierarchy of centres' and scale is a reasonable criteria to use within such hierarchies.

16. Core Strategy Policy CE3 Employment Zones

06/17 Barton Willmore for Tollgate Partnership

- 16.1 Supports the amendments to CE3 and DP5, however clarification to the wording of appropriate uses is recommended. In particular support is given to the increased flexibility afforded to the development of allocated employment sites for other uses where there is no reasonable prospect of these sites being development for employment uses. It is suggested that this is supported with clarification of the uses that are appropriate in allocated employment sites and what constitutes 'economic development' as per the definition set out in the NPPF.

CBC Initial Response

- 16.2 Subject to the Inspector's agreement, the Council would be willing to add the NPPF definition of economic development to the Glossary. Whilst this would duplicate content within the NPPF, it is considered to promote both clarity regarding planning policies on employment and ease of reference. The proposed minor change is not associated with any issues of soundness or legal compliance.

12/43 Andrew Martin Planning for Thomas Bates & Son Limited

- 16.3 Generally the draft revisions to CE1, CE3 and DP5 together with the explanatory text take a more rigid stance than the NPPF in that in such cases where there is no reasonable prospect of an existing employment site being used for that purpose, the document seeks to secure other commercial uses, rather than alternative uses of land or buildings to be treated on their merits. Further revisions are suggested which are considered to bring the policy in accord with paragraph 22 of the NPPF as follows:
- 16.4 Delete 'commercial' from the third line of the final paragraph: *In accordance with the National Planning Policy Framework, where there is no reasonable prospect of a site being used for an allocated employment use, applications for alternative commercial uses in Employment Zones will be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.* The objectors consider that the revised sentence should be inserted into CE1, as noted above, and should be then reiterated in the explanation of Policy CE3.

CBC Initial Response

- 16.5 While the Council does not consider the word 'commercial' needs to be deleted, subject to the Inspector's agreement, the Council is willing to amend the sentence and change it to read '...applications for alternative commercial or other appropriate uses in Employment Zones will be treated on their merits...'. This would clarify that a range of employment-creating uses would be acceptable in principle and would accord with the NPPF definition of economic development which includes public and community uses and main town centre uses in addition

to those within the B Use Class, and excludes housing. This minor change is not considered to raise issues of soundness or legal compliance.

17. Development Policy DP5 Appropriate Employment Uses and Protection of Employment Land and Existing Businesses

06/18 Barton Willmore for Tollgate Partnership

17.1 Supports the amendments to CE3 and DP5, however clarification to the wording of appropriate uses is recommended. In particular support is given to the increased flexibility afforded to the development of allocated employment sites for other uses where there is no reasonable prospect of these sites being development for employment uses. It is suggested that this is supported with clarification of the uses that are appropriate in allocated employment sites and constitute 'economic development' as per the definition set out in the NPPF.

CBC Initial Response

17.2 Subject to the Inspector's agreement, the Council would be willing to add the NPPF definition of economic development to the Glossary. Whilst this would duplicate content within the NPPF, it is considered to promote both clarity regarding planning policies on employment and ease of reference. The proposed minor change is not associated with any issues of soundness or legal compliance.

11/32 Martin Robeson for Churchmanor Estates

17.3 The policy needs amending since it is wholly inconsistent with the Framework as it imposes unacceptable burdens on the developer in respect of marketing and in seeking alternative provision to compensate for the loss of existing land. The five criteria should be in the alternative, ie with 'or' added after each point.

CBC Initial Response

17.4 The revisions made to the policy are considered to increase flexibility while ensuring that the Council can still meet the important objective of securing and retaining land for employment purposes. The burdens imposed on the developer are not considered unacceptable since the wording has been modified to increase the focus on proportionality, with the criteria to be satisfied 'as appropriate'.

12/44 Andrew Martin Planning for Thomas Bates & Son Limited

17.5 Generally the draft revisions to CE1, CE3 and DP5 together with the explanatory text take a more rigid stance than the NPPF in that in such cases where there is no reasonable prospect of an existing employment site being used for that purpose, the document seeks to secure other commercial uses, rather than alternative uses of land or buildings to be treated on their merits. Further revisions are suggested which are considered to bring the policy in accord with paragraph 22 of the NPPF as follows:

17.6 The criteria (i) to (v) stated at the latter part of the policy are too onerous, inflexible and unreasonable in the context of the NPPF paragraph 22 and should be replaced with text providing that applications will be treated on their merits as above. The criteria (i) to (v) could be added using the text as guidance 'as

appropriate' to the explanatory text. The final paragraph of DP5 should be deleted in its entirety as each case should be treated on its individual merits.

CBC Initial Response

18.7 The revisions made to the policy are considered to increase flexibility while providing that the Council can still meet the important objective of securing and retaining land for employment purposes. The wording already provides that the criteria should be applied 'as appropriate'.

16/56 Natural England

17.8 Disappointed to note the removal of text providing for special consideration for rural employment sites.

CBC Initial Response

17.9 This sentence was deleted from policy DP5 for two reasons. Firstly, because it is considered that policies ENV2 and DP1 provide sufficient protection to ensure that proposals for employment development in rural local employment zones will minimise the impact on the landscape through appropriate design. Secondly, because change of use of small scale rural commercial schemes to other uses has been given more flexibility under the provisions of the permitted development regulations [Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013] many schemes that would have been considered under this part of policy DP5 will no longer need planning permission.

17/62 CP Bigwood for Abberton Manor Developments Limited

17.10 Policy needs to be clarified to state that uses with Use Class C2, nursing homes and residential institutions etc., provide significant levels of direct employment. Policies should promote new development and enhancements of complexes within its boundaries, particularly because of the rapidly increasing percentage of the Borough's older population.

CBC Initial Response

17.11 Additional wording noting the employment benefits of C2 uses is not required to make the policy compliant with the NPPF. The Development of a new Local Plan will provide the opportunity to review requirements arising from the needs of Colchester's older population.

26/83 Collins and Coward for Bunting & Sons

17.12 Policy needs to reflect paragraph 28 of the NPPF to ensure jobs and employment are encouraged and located in the countryside. Sentence providing that 'rural business and tourism will be acceptable in the countryside' should be added.

CBC Initial Response

17.13 The policy as it is proposed to be worded is considered to comply with the NPPF. DP9 provides specific guidance on employment in the countryside, so it is not considered necessary to duplicate that in another policy. The explanatory text of DP5 provides guidance on the consideration of change of use of rural commercial schemes.

**18. Development Policy DP7 Local Centres and Individual Shops
(Not proposed for revision as part of the Focused Review)**

11/37 Martin Robeson for Churchmanor

18.1 The policy is inconsistent with the Framework since the NPPF does not give protection to local shops that are not identified as centres in Local Plans. The protection of local shops is with regard to their loss through change of use or demolition and not through impact (paragraph 70). In addition 'scale' is no longer a retail impact test in paragraph 26 of the Framework (this was part of the earlier impact test in PPS4). Meanwhile, the Council is proposing to delete the reference to safeguarding local shops in CE2c.

CBC Initial Response

18.2 Subject to the Inspector's agreement, It is agreed that the paragraph providing safeguarding for individual shops outside centres could be deleted as it is otherwise inconsistent with the deletion of the safeguarding local shops proviso in CE2c and with the greater flexibility provided in the NPPF to allow buildings to change use to adapt to changing circumstances. Additionally, greater flexibility for changes of use being made under the provisions of the permitted development regulations will mean that many schemes that would have been considered under this part of policy DP7 will no longer need planning permission. This minor change is not considered to raise issues of soundness or legal compliance.

**19. DP8 – Agricultural Development and Diversification
(Not proposed for revision as part of the Focused Review)**

26/87 Collins and Coward for Bunting & Sons

19.1 Policy needs to reflect paragraph 28 of the NPPF to ensure jobs and employment are encouraged and located in the countryside. Wording changes supplied that removes criteria that are considered to constrain farm diversification proposals.

CBC Initial Response

19.2 It is not considered appropriate to amend the policy wording as proposed, as it would result in insufficient protection for countryside assets and amenity. This would be contrary to the emphasis given in the NPPF to conserving and enhancing the natural environment. (See NPPF section 11)

**20. DP9 – Employment Uses in the Countryside
(Not proposed for revision as part of the Focused Review)**

26/84 Collins and Coward for Bunting & Sons

20.1 Policy needs to reflect paragraph 28 of the NPPF to ensure jobs and employment are encouraged and located in the countryside. Policy should be reworded to delete references to small scale and criteria for particular types of rural employment proposals.

CBC Initial Response

20.2 The policy as it is proposed to be worded is considered to comply with the NPPF. It is appropriate to include criteria for the scale, type and extent of rural

commercial buildings since the NPPF supports conserving and enhancing the natural environment in addition to supporting a prosperous rural economy.

21. DP10 Tourism, Leisure and Culture (Not proposed for revision as part of the Focused Review)

[26/88 Collins and Coward for Bunting & Sons](#)

21.1 Needs to reflect paragraph 28 of the NPPF to ensure jobs and employment are encouraged and located in the countryside. Wording suggested that deletes criteria constraining new tourism, leisure and culture developments.

CBC Initial Response

21.2 It is not considered appropriate to amend the policy wording as proposed in this consultation response as it would provide insufficient protection for countryside assets and amenity.

Housing Policies

22. Core Strategy H2 Housing Density

22.1 No unsound responses.

23. Core Strategy H3 Housing Diversity

[17/63 CP Bigwood for Abberton Manor Developments Limited](#)

23.1 Policy H3 needs to be amended to specifically refer to the need to provide accommodation for the Elderly and the Elderly in need of Care because the reference to a 'mix' of housing does not sufficiently reflect the huge population growth in the Elderly sector.

CBC Initial Response

23.2 Policy H3 refers to the need for housing developments to contribute to the provision of affordable housing and homes that are suitable to the needs of older persons. The policy is accordingly in compliance with paragraph 50 of the NPPF which states that local planning authorities should plan for a mix of housing. The Council will, however, address the requirements to meet specific needs for housing for older people as part of the Full Review and through ongoing work for its Housing Strategy. This will include analysis of need in the Strategic Housing Market Assessment as well as the merits of specific allocations for specialist housing.

24. Core Strategy Policy H4 Affordable Housing

[01/05 Mersea Homes](#)

24.1 Support the reduction to 20% on the grounds of viability. The second bullet point needs to be changed to say 5 or more dwellings. If 3 is retained this leads to an overly high requirement of 33.3% affordable which is not viable. The final paragraph on page 40 repeats the one above requiring a viability appraisal and should therefore be deleted. The final sentence of the new wording in the policy box on page 41 should be deleted as it is overly restrictive. It could be the SHMA

finds a need for 2 bedroom units but 3 bedroom units are considered what market forces require for the private development.

CBC Initial Response

- 24.2 Subject to the Inspector's agreement, the Council would be minded to raise the threshold for rural areas from three to five units to ensure that the 20% requirement can be applied consistently. This reflects the affordable housing evidence base document (ED17) which tested five sites of five units.
- 24.3 Subject to the Inspector's agreement, the Council would be minded to accept the deletion proposed by the respondents of the final paragraph on page 40 concerning the effect of viability on affordable housing requirements as it largely duplicates the new proposed wording in the previous paragraph. This change is considered to improve the clarity of the document but is not considered essential to ensure the overall soundness or legal compliance reasons.
- 24.4 The wording of the policy on page 41 is not considered overly restrictive. It is intended to ensure overall consistency between the character of homes in different tenures, but is not prescriptive as to the exact characteristics of each type of tenure.

05/12 CPREssex

- 24.5 Uneasy about the principle of cross subsidy but accept it is included in national policy. The policy could however be ineffective as it is not clear how the land element is to be valued. If a landowner insists on full residential value, or close to it, then the viability of any scheme is completely different to one where the landowner is prepared to enter his land on a valuation of agricultural land plus a bit extra. It should be made clear that the land element of any viability assessment should be on the basis of a minimal uplift of agricultural value not on the basis of residential value.

CBC Initial Response

- 24.6 The general guidance in the policy on ensuring a majority of affordable housing units is intended to support the principle of maintaining lower values on the affected agricultural land. The policy requires that viability work would need to be carried out to support the specific decisions made on particular sites concerning the type of housing and consequent land value and it is not considered that additional wording on this point is required. The amount of cross subsidy required should only be what is necessary to make the scheme financially viable for the appropriate number, mix and tenure of affordable homes to be provided rather than led by a desire to build numbers of open market sale units with some affordable housing added on to give the scheme some respectability. Should landowner valuations be unrealistic the scheme becomes unviable and nothing would be built. It is not intended that the affordable housing should be regarded as a 'tax' on a free for all sale of agricultural land for open market development.

07/19 Hills Building Group

- 24.7 The representor considers the overall Focused Review to be sound, but suggests specific changes to H4 which are considered to make his view of H4 to be

‘unsound’. It is suggested that the number of affordable units on a sites should be ‘at least equal to’ rather than ‘greater than’ as the value of the market housing will be diminished and therefore its ability to cross-subsidise the affordable housing. It is also suggested that plot size and scale are removed from the requirement that homes should be comparable regardless of tenure. This is considered to be required as potentially the correct number of affordable units is provided in line with the Housing Needs Survey but the likelihood of the financial cross subsidisation being successful is diminished because the developer has to provide a size and scale of private market dwellings that the market doesn’t want.

CBC Initial Response

24.8 The requirement for the number of affordable units to be ‘greater than’ is considered important to ensure that the primary purpose of rural exception sites continues to be the provision of affordable housing. It is considered appropriate to seek general levels of comparability between market and affordable housing, but the detailed design process and the viability assessment process would provide sufficient flexibility to alter detailed layouts if justified.

Environment Policies

25. Core Strategy Policy ENV2

26/81 Collins and Coward for Bunting & Sons

25.1 Policy needs to reflect paragraph 28 of the NPPF to ensure jobs and employment are encouraged and located in the countryside. Wording changes proposed which would delete references to small scale and limitations on development outside village settlement boundaries. First sentence should be amended to read: *The Borough Council will enhance the vitality of rural communities by supporting appropriate development including the expansion of all types of business and enterprise through both conversion of buildings and well-designed new buildings, the promotion and diversification of agriculture and other land-based rural businesses, sustainable tourism and leisure that benefits businesses in the rural area, communities and visitors, and the retention and development of local services in villages.*

CBC Initial Response

25.2 The proposed wording in the consultation response is considered to provide insufficient protection for countryside assets and amenity; the NPPF supports conserving and enhancing the natural environment as well as a prosperous rural economy. For this reason, it is not felt appropriate to make the proposed changes to the policy wording.

26. DP24 Equestrian Activities

26/85 Collins and Coward for Bunting & Sons

26.1 Propose that instead of deleting the policy the first sentence only should be retained. This is considered to reflect paragraph 28 of the NPPF to ensure jobs and employment are encouraged and located in the countryside.

CBC Initial Response

26.2 Policy DP24 has been deleted, but it is considered that the point made in this consultation response is addressed, as the first sentence of the policy has been retained and carried forward in policy DP9.

27. ENV1 Environment

(Not proposed for revision as part of the Focused Review)

16/57 Natural England

27.1 Should be included for focused review since it includes references to the now obsolete PPS25 as well as inconsistencies with the NPPF on natural environmental issues, for example not recognising the wider benefits of ecosystem services (NPPF paragraph 109) or considering geodiversity (NPPF paragraph 113)

CBC Initial Response

27.2 Since the publication of the NPPF, Colchester Borough Council has been reviewing its adopted policy documents against the requirements of the NPPF in order to identify any areas of inconsistency. Initial assessments have found that the NPPF has implications for some of the policies contained within the adopted Core Strategy and the Development Policies document. As part of the Focussed Review the Council is only revising those policies that can be readily amended to be consistent with the provisions of the NPPF, without the need to prepare further extensive evidence in respect of those specific policies.

27.3 Core Strategy policy ENV1 is not considered to be out of conformity with the NPPF and therefore it is not considered necessary to include it in the Focused Review process. Policy ENV1 clearly states that the Council will safeguard geodiversity in the Borough and further protection and enhancement of geological assets across Colchester Borough are delivered through Development Policy DP21 (Nature Conservation and Protected Lanes). The Council accepts that the policy needs to be amended to remove reference to obsolete PPSs and proposed changes to ENV1 have been included in the table of proposed minor changes (ref 10).

26/86 – Collins and Coward for Bunting & Sons

27.4 Policy needs to reflect paragraphs 28 and 116 of the NPPF to ensure appropriate development in the countryside and AONBs. The following amendments are proposed:

- Qualify protection for Natura 2000 sites and Dedham Vale AONB by providing that major developments that have a significant adverse impact will not be supported unless they can be demonstrated to be in the public interest.
- Coastal Protection Belt - proposed development should not have a *significant* adverse effect.
- Delete reference to PPS25.
- Land outside settlement boundaries should have less strict constraints on development if in accordance with other policies.

CBC Initial Response

27.5 The proposed wording in the consultation response is not considered to provide sufficient protection for countryside assets and amenity as required by the NPPF (paragraph 109). The NPPF is clear that the presumption in favour of sustainable development does not apply to development affecting Natura 2000 sites (NPPF paragraph 119). For this reason it is not felt appropriate to make the changes proposed, other than the deletion of reference to the now superseded PPS25.

28. Development Policy DP20 Flood Risk and Management of Surface Water Drainage

(Not proposed for revision as part of the Focused Review)

11/40 Martin Robeson for Churchmanor Estates

28.1 The approach in the Framework at paragraphs 99-104 changes the emphasis to provide that development should 'avoid' areas where development will be at risk of flooding. This approach is more positive and less prescriptive than that set out in DP20. Minor changes involving the removal of all references to PPS25 and replacement with reference to the NPPF were suggested.

CBC Initial Response

28.2 No actual changes were proposed to policy DP20. The NPPF is still considered to provide reasonably prescriptive guidance around the issue of flood risk and development not only in paragraphs 99-104 but also in the Technical Guidance on Flood Risk accompanying the NPPF. The NPPF still seeks to direct most development to areas with the lowest probability of flooding and promotes the need to protect people and property. The NPPF still promotes the need to adopt a sequential approach when allocating land and requires the application of the Sequential and Exceptions Tests for developments in higher flood risk areas. It also encourages the use of mitigation and adaptation measures to reduce flood risk impacts arising from new developments. Policy DP20 is considered to accord with the NPPF. Minor modifications DP20 requiring the deletion of all references to PPS25 and replacement with reference to the NPPF have been included in the proposed Minor Modifications table as they are matters of fact.

29. DP21 Nature Conservation and Protected Lanes (Not proposed for revision as part of the Focused Review)

11/24 Martin Robeson for Churchmanor Estates

29.1 The Framework at paragraph 118 has a much more positive approach to the subject matter and thus Policy DP21 is inconsistent with this. It also needs to be updated to recognise the opportunity to designate new Nature Improvement Areas which were introduced through the NPPF.

CBC Initial Response

29.2 The criteria in policy DP21 are consistent with the requirements of paragraph 118 of the NPPF regarding the protection of designated sites, protected species and nature conservation generally. The Council does not feel it is necessary to amend policy DP21 at this stage to include reference to Nature Improvement Areas. No Nature Improvement Areas have been proposed in Colchester

Borough at this time. The Council does not consider that the lack of reference to Nature Improvement Areas in policy DP21 affects issues of soundness or legal compliance with the NPPF. Policy DP21 will be reviewed as part of the development of the new Local Plan for Colchester at which time the need to include reference to Nature Improvements Areas can be reviewed based on evidence available

26/91 Collins and Coward for Bunting & Sons

29.3 Policy needs to reflect the original basis for the designation of Protected Lanes. Wording proposed to remove 'only' – development will ~~only~~ be supported where it meets a range of criteria. Proposals for development that would cause direct or indirect significant adverse harm to designated sites should only not be permitted if the harm is 'significant'. Wording on Protected Lanes should be deleted.

CBC Initial Response

29.4 It is not considered necessary to revise the policy, as the existing policy wording is felt to attribute appropriate weight to relevant environmental considerations, and accords with the NPPF.

30. DP22 Dedham Vale Area of Outstanding Natural Beauty **(Policy not proposed for review as part of the Focused Review)**

26/92 Collins and Coward for Bunting & Sons

30.1 Policy needs to reflect Section 11 of the NPPF. Wording changes proposed to lessen constraints on development in the Dedham Vale AONB, including requiring that adverse affects be 'significant', and by deleting reference to the Dedham Vale AONB & Stour Valley Management Plan.

CBC Initial Response

30.2 It is not considered appropriate to make the changes proposed. The policy as worded is considered to assign appropriate weight to relevant environmental considerations. The NPPF (paragraphs 115 & 116) states that great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty and planning permission for major development should be refused except in exceptional circumstances and where it can be demonstrated that they are in the public interest.

Energy Policies

31. Core Strategy Policy ER1 – Energy, Resources, Waste Water and Recycling

01/06 Mersea Homes

31.1 Wording should refer to the NPPF requirement to 'adopt nationally described standards' and not refer to a specific level. The final sentence of the policy regarding urban extensions delivering zero carbon homes from 2016 should be deleted as it is not justified.

CBC Initial Response

31.2 Policy ER1 refers to nationally described standards as stated in paragraph 95 of the NPPF. The Council encourages development to build to the Code for Sustainable Homes and BREEAM, which are nationally described standards. It

is appropriate for the Council to refer to specific levels as this adds a local element to the policy. The specific levels referred to are in line with the government's zero carbon buildings policy, as referred to in paragraph 95 of the NPPF, and so will not place an undue burden on developers in terms of the cost of building more sustainable buildings.

- 31.3 The sentence regarding urban extensions is justified. This sentence has not been altered from the adopted Core Strategy and it is not considered that the sentence is contrary to the NPPF.

Design Policies

32. Development Policy DP1 – Design and Amenity

[11/27 DP1 Martin Robeson for Churchmanor Estates](#)

- 32.1 The policy is inconsistent with the NPPF's requirement that planning seeks to 'optimise the potential of the site to accommodate development'.

CBC Initial Response

- 32.2 It is considered that policy DP1 complies with the NPPF and the aim to achieve sustainable development. Recent appeal decisions for a replacement dwelling in Dedham (2189988) and an extension in Aldham (2194828) support this view, with both Planning Inspectors finding policy DP1 to be in compliance with the NPPF.

Additional issues raised in relation to policies not proposed for review

Transport

33. Core Strategy Policy TA1 Accessibility and Changing Travel Behaviour **(Policy not proposed for review as part of the Focused Review)**

11/41 Martin Robeson for Churchmanor Estates

33.1 The third paragraph of Policy TA1 which states that ‘future development in the Borough will be focused on highly accessible locations’, and that ‘developments that are car-dependent or promote unsustainable travel behaviour will not be supported’ is not consistent with paragraph 34 of the NPPF which notes that the requirement to use sustainable transport modes should be considered in the account of other NPPF policies.

CBC Initial Response

33.2 NPPF paragraph 30 encourages local planning authorities to support a pattern of development which where reasonable to do so facilitates the use of sustainable modes of transport. Paragraph 34 goes on to say that decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport will be maximised.

33.3 The Council did not include any transport policies in the Focused Review as none were considered to contain wording which conflicted with the NPPF. The policy is to be reviewed as part of the development of a new Local Plan in liaison with ECC who are to review their Highway development management policies document to be aligned with the NPPF.

34. Core Strategy TA4 Roads and Traffic **(Policy not proposed for review as part of the Focused Review)**

11/28 Martin Robeson for Churchmanor Estates

34.1 The approach in TA4 of managing to prevent adverse impacts is not consistent with the broader approach in the NPPF which provides that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are ‘severe’. The objection needs to be read in the context of their representations on SD2 and DP3 which state that an overall approach to the delivery of infrastructure in growth areas is required to deliver the Council’s spatial strategy.

CBC Initial Response

34.2 The Council did not include any transport policies in the Focused Review as none were considered to contain wording which conflicted with the NPPF.

34.3 The approach in TA4 results in the provision of Transport Statements and /or Transport Assessment as needed which allow the Council to determine significant impacts and how they should be addressed by the development. This is in accord with NPPF paragraph 32, final bullet point which states that ‘improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.’

34.4 The policy will be reviewed as part of the development of a new Local Plan in liaison with ECC who are to review their Highway development management policies document to be aligned with the NPPF.

35. Core Strategy Policy TA5 Parking

(Policy not proposed for review as part of the Focused Review)

11/25 Martin Robeson for Churchmanor Estates

35.1 The approach is unduly prescriptive, contrary to the Framework including the text in the third paragraph as to where car parking should be located.

CBC Initial Response

35.2 The Council did not include any transport policies in the Focused Review as none were considered to contain wording which conflicted with the NPPF.

35.3 The policy will be reviewed as part of the development of a new Local Plan in liaison with ECC. Colchester adopted the Essex parking standards and is currently working with ECC on a revised document.

36. Development Policy DP17 Accessibility and Access

(Policy not proposed for review as part of the Focused Review)

11/35 Martin Robeson for Churchmanor Estates

36.1 The approach is inconsistent with that taken by the Framework at paragraphs 29 to 41 on transport. In particular, the third bullet point at paragraph 32 makes it clear that development will only be resisted where there will be 'severe' impacts.

CBC Initial Response

36.2 There are 3 bullet points in paragraph 32 and all these points need to be considered. The final bullet point states that 'improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development'. A Transport Statement and or Transport Assessment may be needed and significant impacts must be addressed by the development.

36.3 The policy will be reviewed as part of the development of a new Local Plan in liaison with ECC who are to review the Highway development management policies document to be aligned with the NPPF.

26/90 Collins and Coward for Bunting & Sons

36.4 Policy needs to reflect Section 4 of the NPPF. Wording proposed to remove requirement to give priority to pedestrians, cycling and public transport. Access and any traffic generated should not 'significantly' rather than 'unreasonably' harm the surroundings.

CBC Initial Response

36.5 It is not considered appropriate to make the changes to the policy, proposed in this consultation response. The policy, as worded, is considered to assign appropriate weight to transport considerations, and accords with the NPPF.

37. DP19 Parking Standards

Policy not proposed for review as part of the Focused Review

11/31 Martin Robeson for Churchmanor Estates

37.1 The approach in this policy is inconsistent with that taken by the NPPF at paragraph 39. This includes references to local planning authorities taking account of 'local car ownership levels' in setting local parking standards. This factor was not taken into account in the Essex Vehicle Parking Standards.

CBC Initial Response

- 37.2 Ownership levels were considered as part of the Essex Vehicle Parking Standards. Paragraph 1.2.4 of the standards states:
Through the review group a number of conclusions have been drawn:
1. 93 out of 267 (35%) wards in Essex have an average car ownership in excess of 1.5 vehicles per household (2001 census).
- 37.3 The policy is to be reviewed as part of the development of a new Local Plan in liaison with ECC. Colchester adopted the Essex parking standards and is currently working with ECC on a revised document.

Historic Environment

38. DP14 Historic Environment Assets

Policy not proposed for review as part of the Focused Review

26/89 Collins and Coward for Bunting & Sons

38.1 Policy needs to reflect Section 12 of the NPPF. Wording change proposed to insert 'significantly' in front of 'adversely affect a listed building, a conservation area, historic park or garden or important archaeological remains'.

CBC Initial Response

38.2 The addition of the word 'significantly' is considered to tilt the weighting too far away from ensuring enhancement and protection of historic assets. It is not, therefore, felt appropriate or necessary to amend the policy as proposed. The concept of 'significance' is used in a different context in the relevant section of the NPPF. Paragraph 126 states that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.

39. Sustainability Assessment (SA) and Habits Regulation Assessment

02/08 Stephen Miller

39.1 Reference is made on page 30 to the Colchester AQMA, but CBC has not produced a strategy/plan to reduce the current levels of pollution in all the designated Air Quality Management Areas. CBC are therefore not considered to be in a position to complete any policies within the area of any AQMA unless the illegal levels of pollution are reflected in any outcome or policy.

CBC Initial Response

39.2 This representation refers to Air Quality Management Areas (AQMA's) and their Action Plans. These are live documents, unlike the Local Plan, and are covered by environmental health legislation.

39.3 Local authorities are required to produce an Action Plan following the designation of an Air Quality Management Area. Colchester Borough Council declared an area around Mersea Road as an AQMA in 2001 and produced an Action Plan in 2004. The Council also declared Brook Street as an AQMA in 2006 and produced a final draft Action Plan in 2006. The Action Plan includes measures being implemented by the Council to improve air quality in the AQMA.

39.4 Following a detailed assessment of air quality in 2010, the Council identified further areas of exceedences outside of the AQMAs. Consequently the Council declared a larger AQMA in 2012 which included Area 1 (Central Corridor) and incorporated the Mersea Road AQMA and the Brook Street AQMA
<http://www.colchester.gov.uk/CHttpHandler.ashx?id=3344&p=0>

39.5 In 2012, the Council carried out a further assessment of air quality within the larger AQMA. Based on the outcome of the study the Council has amended the AQMA to include St Johns Street. The amended order and the map is available at: <http://www.colchester.gov.uk/CHttpHandler.ashx?id=9755&p=0> Work on the development of an Action Plan for the new AQMA is ongoing and the Council continues to implement the measures in the Mersea Road Action Plan and the Brook Street Action Plan. The Council will take forward some of these measures in the new Action Plan. Action Plans are live documents in which local authorities regularly update to reflect progress and new development. The majority of local authorities commence implementation of measures in draft plans before air quality plans are finally adopted.

16/72 Natural England

39.6 Previous comments have not been adequately addressed. The Sustainability Appraisal notes that if the evidence indicates that there is a link between more rural development and increased impact on Natura 2000 sites, then appropriate management measures can be implemented. Natural England do not consider this sufficient to address the issue. The HRA should provide justification as to why changes to increase rural housing and employment will not have a significant impact on Natura 2000 sites. It is not clear what management measures will be implemented or how these issues will be addressed when

proposals for development come forward. Any areas of uncertainty should be addressed in the HRA of the Plan.

CBC Initial Response

39.7 The Council has provided Natural England with further information to justify why an appropriate assessment is not needed for the Focused Review. In response to this further information Natural England commented that:

“In relation to the information provided Natural England is satisfied that, given that no new allocations are proposed in the Focused Review and that policies ENV1 and, in particular, Development Policy DP21 address impacts on internationally designated sites, the plan can be considered sound and legally compliant with regards to the Habitats Regulations.”

39.8 Natural England considers that the Habitat Regulations Assessment screening opinion should be updated to reflect the further information provided. Accordingly, an appendix to the Sustainability Appraisal Report has been included in the Submission Evidence Base which includes the Council’s justification that an appropriate assessment is not needed (Core Document CD2d). Although this was not available during the public consultation period, it is considered that the appendix provides clarification only and does not introduce any new material.

22/71 Myland Community Council

39.9 The Sustainability Appraisal should be re-done using the 13 NPPF sustainability factors rather than the old 9 criteria which are now out of date. The scoring of Policy SD1 is incorrect and should be amended as a good score is registered against SA criteria 8 – To conserve and enhance the natural environment, natural resources and the biodiversity of the Borough – which is untrue when development occurs, particularly on greenfield sites. Referenced documents concerning Colchester’s character, landscape, parks and green spaces, open space, and sport and leisure are all dated 2006/07 whereas other documents are much more recent. This implies a disproportionate focus on urban development and imbalance in documentation update.

CBC Initial Response

39.10 As this is a Focused Review of the Council’s adopted Core Strategy and Development Policies it is entirely appropriate for the Sustainability Appraisal (SA) to use the same sustainability criteria as the SAs of these documents as this provides consistency with previous SA work. It would not be appropriate to use the core planning principles in the NPPF as the sustainability framework is locally distinctive. It is derived from a collection of data about Colchester, a review of relevant policies, plans and programmes, and identification of sustainability issues relevant to Colchester.

39.11 The SA appraisal for policy SD1 gives all three options a mixed scoring for objective 8. The general evaluation recognises that all three options promote development, so there is a risk of a negative impact against the objective of conserving and enhancing the natural environment, natural resources and the biodiversity of the Borough. However, the policy options direct development to the most sustainable locations, which will minimise the negative impacts of

development on this objective. New development also provides an opportunity to impact positively against the objective, and all three policy options require new development to minimise and/or mitigate pressure on the natural environment and to seek to sustain the character of the countryside.

- Press cutting from Colchester Gazette Monday 12 August 2013

gazette-news.co.uk

Gazette Monday August 12, 2013 11

Picture it! A free hairdo

WOMEN are being urged to swap their old photos of Harwich... for a haircut.

The Journeyer art project, based in a former hair salon in Church Street, wants to build up an archive of photographic memories.

Residents can take in their photos and get their hair styled by trainees and professional snippers on Thursday, August 22, from 10.30am until 3pm.

Artist Cora Glaser said: "The hairstyle exchange is an incentive to encourage residents to unearth and share their photographic memories."

Quiz to help tea party

A QUIZ night will be held to raise money for Colchester's 12th Life After Breast Cancer tea party.

The quiz is at Mersea Island School, in Barfield Road on Saturday, September 14, at 7pm.

The Friends of Essex County Hospital Breast Care Unit is appealing for teams of up to six at £5 a head. Teams can bring their own food and drink.

Money raised will cover costs of this year's tea party at Colchester's Moot Hall on Thursday, October 3.

For more information, e-mail karen.reeve@colchesterhospital.nhs.uk or call 01206 744408.

Have a say on future

A CONSULTATION on how Colchester Council decides how the borough takes shape has been launched.

A review of the authority's planning policies will run until Monday, September 16.

There will be two public workshops at the town hall on Wednesday, September 4, at 2pm and Tuesday, September 10, at 6pm.

The changes, introduced by the Government's National Planning Policy Framework, could affect Colchester's policies for developer contributions, rural housing, neighbourhood planning and employment in the countryside.

Visit colchester.gov.uk/planningconsult for more information.

TGI Friday's restaurant, in Charter Way, Braintree, has opened, creating 90 jobs. The American-themed diner can serve more than 280 people at a time, making it one of the chain's biggest branches in the country.

FORMER BUS ENGINEER HITS OUT AT SYSTEM THAT 'STINKS'



Fed up - Ian Woollard feels he is being hounded to go back to work

Picture: NIGEL BROWN C083485_03

'Get a job' order to lung clots man caring for dad, 76

By CHAD NUGENT
chad.nugent@cpa.com

A MAN who has not worked since suffering blood clots on his lungs five years ago has been told he has to get a job.

Ian Woollard, 46, has been told he cannot keep claiming disability benefits after undergoing a fit-for-work check.

Mr Woollard, from Lawford, was assessed by experts and informed his £85-a-week employment and support allowance is being stopped. He has to sign up for £71.70-a-week jobseeker's allowance instead.

Mr Woollard cares for his dad, Brian, 76, who is undergoing chemotherapy for liver cancer.

Mr Woollard said: "I feel like I am being hounded to go back to work. They don't understand that in my situation I am trying to be a carer for my father as well. The system stinks. It is dreadful."

Before his health problems, Mr

REVAMP MOVE ON TESTING

EMPLOYMENT Minister Mark Hoban last month ordered a revamp of the benefits testing system after it was found 41 per cent of claimants may have been wrongly passed fit to work.

The annual cost of appeals against decisions had risen from £21million to £36million in the past four years, and the number of appeals from 279,000 to

465,000. The Government admitted many tests carried out by Atos between October 2012 and this March were "C grade".

The French company said that did not mean its reports were wrong, but it has been told to create an action plan.

Mr Hoban said new firms would help carry out work capability assessments.

Woollard was a bus engineer in Ipswich, a job that could command £20,000-plus today.

He said: "I loved that job. I tried to return shortly after my illness, but kept having to take time off. I couldn't carry on."

"I would love to work, but I'm just not fit enough." Mr Woollard's problems began in 2008 with chest pains and shortness of breath. It turned out he had

blood clots on his lungs, which could have killed him.

He still takes warfarin tablets to thin his blood and has low levels of testosterone, vitamin D and calcium.

Mr Woollard said his illness made him prone to clumsiness and inability to concentrate.

He said: "Sometimes I cannot drive and have spells where I am so clumsy: I nearly cut my thumb

off with a saw trying to fix something. I just can't focus enough to be able to do a job."

Atos Healthcare has been commissioned by the Government to carry out fit-to-work checks on disability benefit claimants.

Mr Woollard was visited by two healthcare professionals and a doctor. They carried out rudimentary checks, including a grip test, asking him to touch his toes and enquiring about his ability to walk, and considered he was fit enough.

Mr Woollard said: "It seems to equate to the fact I am able to hold a pen and walk a few paces."

A spokesman for the Department for Work and Pensions said: "We look at what people have the ability to do and take into account advice from doctors."

"If anyone is looking after another person who is heavily reliant upon them, they may be entitled to carer's allowance."

- Press cutting from Essex County Standard Friday 16 August 2013

Help shape the town's future

A consultation on how Colchester Council decides how the borough takes shape has been launched. A review of the authority's planning policies will run until September 16. There will be two public workshops at the town hall on September 4, at 2pm, and September 10, at 6pm. The changes, introduced by the Government's National Planning Policy Framework, could affect Colchester's policies for developer contributions, rural housing, neighbourhood planning and employment in the countryside. See colchester.gov.uk/planningconsult

Accidental blaze wrecks caravans

Two caravans have been destroyed by a fire. Fire crews were called to Abbot's Road, Colchester, shortly after 12.15pm on Sunday, when the blaze broke out. Firefighters wearing breathing equipment used three jets to tackle the fire, which was extinguished by 1.10pm. No-one is reported to have been in the caravans. The cause of the fire has been recorded as accidental.

Family's young dog snatched in park

Pet theft a growing problem

Adam Cornell

A FAMILY are distraught after one of their Jack Russell dogs was snatched by thieves in a park. Monty was stolen from the Lexden Park Nature Reserve, in Church Lane, Colchester, where owner Catherine Turner was walking the 18-month-old dog with his sister Ruby. Mrs Turner, of Magazine Farm Way, Colchester, said: "The dogs were running into the woods and I called them, but only Ruby came back.

"We searched for hours, but couldn't find him. Two boys were cycling up the road and I asked if they had seen him and they said they had seen a man picking him up by his hind legs. "They described Monty perfectly, right down to the splodges which make him look like a cow." Animal welfare experts say dognapping is a growing problem nationwide. Jayne Hayes, who set up the organisation and website doglost.co.uk ten years ago, said it had received 150 reports of missing dogs



Appeal: Monty's owner Catherine Turner with his sister Ruby by one of her posters.

Picture: Seana Hughes/Colchester

this year alone and believed 90 per cent of cases were the result of theft. Ms Hayes believes pets are being stolen to sell on, or for breeding.



Snatched: Monty, the Jack Russell

One such example is Colchester man Gary Sherman's £2,500 French bulldog, which was stolen from under his nose at Abbey Fields in June.

However, Mrs Turner is puzzled why thieves would take Monty, as he is not a pedigree dog and has been neutered. The family have placed adverts, put up posters and appealed on social media sites for his return – so far without success. Monty is micro-chipped and his owners have also

reported his loss to the RSPCA and doglost.co.uk. Mrs Turner said: "There have been possible sightings, but we haven't found him. "His sister is really pining for him." Police have confirmed Monty's disappearance had been reported and was being treated as theft. Officers would like to hear from the two boys who spoke to Mrs Turner on July 25 – the day after he was stolen. Anyone with information is asked to call Colchester police on 101. adam.cornell@nqe.com

THE WINE COMPANY'S

STARTS THURSDAY

'Tell us how to save £220m'

Appendix 3

List of Consultees

Duty to Co-operate Consultees

Environment Agency
English Heritage
Natural England
Mayor of London
Civil Aviation Authority
Homes and Communities Agency
Primary Care Trust
Office of Rail Regulation
Transport for London
Integrated Transport Authority
Sustainable Environment &
Enterprise
Highways Agency
Marine Management Organisation
Local Enterprise Partnership
Essex County Council
Suffolk County Council
Tendring District Council
Babergh District Council
Braintree District Council
Maldon District Council
Network Rail

Specific Consultees

Parish Councils

Abberton & Langenhoe Parish Council
Aldham Parish Council
Birch Parish Council
Boxted Parish Council
Chappel Parish Council
Little Horkelesley Parish Council
Copford with Easthorpe Parish Council
East Donyland Parish Council
East Mersea Parish Council
Eight Ash Green Parish Council
Fingringhoe Parish Council
Fordham Parish Council
Great Horkelesley Parish Council
Great Tey Parish Council
Langham Parish Council
Layer de la Haye Parish Council
Layer Marney Parish Meeting
Marks Tey Parish Council
Messing cum Inworth Parish Council
Myland Community Council
Stanway Parish Council

Tiptree Parish Council
Wakes Colne Parish Council
West Bergholt Parish Council
West Mersea Town Council
Winstred Hundred Parish Council
Wivenhoe Town Council
Wormingford Parish Council
Mount Bures Parish Council
Dedham Parish Council
Layer Breton Parish Council

Adjoining Parish Councils

Alresford Parish Council
Ardleigh Parish Council
Brightlingsea Town Council
Bures St Mary Parish Council
Coggeshall PC
Earls Colne PC
East Bergholt Parish Council

Elmstead Parish Council
Feering Parish Council
Great Braxted Parish Council
Great Totham PC
Higham Parish Council
Kelvedon Parish Council
Lawford Parish Council
Nayland with Wissington Parish Council

Stoke By Nayland Parish Council
Stratford St Mary Parish Council
Tollesbury Parish Council
Tolleshunt D'Arcy Parish Council

Tolleshunt Major Parish Council

Tolleshunt Knights Parish Council
White Colne PC

Planning Inspectorate

Planning Inspectorate

Policing body and adjoining

Suffolk Constabulary

Essex Constabulary

(i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003,
(ii) who owns or controls electronic communications apparatus situated in any part of the LPA area

Colt Telecommunications
Eircom UK Ltd
Fibernet Ltd
Gemini Submarine Cable System Ltd
Global Crossing
Kingston Communications (Hull) Plc
Lancaster University Network Services Ltd
Neos Networks Ltd
NTL Group Ltd
Opal Telecom Ltd

Orange Personal Communications Ltd
Regional Communications Team O2 Airwave
SSE Telecommunications Ltd
Telia Sonera International Carrier Ltd
Vtesse Networkds Ltd
Vodafone
Easynet Telecommunications Ltd
Gamma Telecom Holding Ltd
Hutchison Network Services UK Ltd
NWP Spectrum Ltd
Omne Telecommunications Ltd
T-Mobile (UK) Ltd
Wireless World Forum Headquarters

(ii) a person to whom a licence has been granted under section 6(1)(b) or (c) of the Electricity Act 1989(h);

EDF Energy

(iii) a person to whom a licence has been granted under section 7(2) of the Gas Act 1986(a);

British Gas Connections Ltd

(iv) a sewerage undertaker; and

Anglian Water

(v) a water undertaker;

Affinity Water
Thames Water Utilities Ltd
Essex & Suffolk Water
South East Water Plc

All Colchester Borough Councillors

Health

Mid Essex Clinical Commissioning Group

General Consultees

Iceni Projects Ltd
The Stanway School
Hazlemere Infants School & Nursery
Old Heath County Primary School
Greenstead & St Andrews Nursery & Infants
St Georges New Town Junior School
Equality Estates
AMPRESS
CRCL
Barton Willmore

Plater Claiborne Architecture & Design
Essex Roofing Company Ltd
Higgins Construction Plc
Colchester and North East Essex Building Preservation Trust
Stanley Bragg Partnership
Warren Insulation
Peldon Village Hall Management Committee
The Wine Centre

Peyton Tyler Mears
Levvel Ltd
The Sixth Form College, Colchester
R H M Joinery
Fenn Wright
Leith Planning
Rose of Colchester Ltd
Diocese of Chelmsford Colchester Area team
Colchester Zoo
Facility Development Manager
R & P Taylor Carpets
Paragon Legal Services Ltd
MOD - Estates
Defence Estates
Saxon House Ltd
The Theatres Trust
Dentistry
Fenn Wright

ADP
 Bernard Jenkin MP For North Essex
 Bob Russell MP for Colchester
 Priti Patel MP for Witham
 Malting Green Surgery
 Colchester Area Community Church
 Queen Elizabeth Hall
 McDonald's Colchester
 Sustainable Environment Consultants Ltd
 Colchester CVS
 Colchester Furniture Project (The Shake Trust)
 Five Poets Residents Association
 East Anglian Chambers
 Shelter
 Colchester Conservative Club
 Colchester Credit Union Ltd
 Fitness First
 Living Streets, Colchester
 Knowles Associates Ltd
 The C M Cadman Group Ltd
 Turley Associates
 Bags o Fun
 Boydens
 Essex County Cricket Club
 Parsons Heath Residents Association
 Owen Partnerships
 DPDS Consulting Group
 Indasa Abrasives (UK)Ltd
 Intel
 CPREssex
 Edward Gittins & Associates
 Barton Willmore
 Gladedale Group
 Forestry Commission
 Colchester Chamber of Commerce
 Harwich International Port
 Road Haulage Association
 Transport for London
 Colchester PCT
 Countryside Properties
 Evening Gazette/Essex County Standard
 Planning Potential
 Greenstead Library
 Wildlife and Countryside Link
 Rydon Homes Ltd
 Wilkin & Sons Ltd
 Ian R Matthers B.S & D
 Cadman Contracts
 Colchester Archaeological Trust
 Colchester & Tendring Women's Refuge
 Colchester Arts Centre
 Colne Housing Society
 Disability East (EDPA)
 National Playing Fields
 Whybrow Chartered Surveyors
 MOD (Colchester Garrison)
 Januarys
 D F Clark Contractors Ltd
 Lawson Planning Partnership Ltd
 Tesco
 Plater Claiborne Architecture & Design
 NTR Planning
 FMA Ltd
 St Mary Residents Association
 Rural Community Council of Essex
 Stephen Egerton Associates
 Icen Homes
 Naylor Property Ltd
 Stephen Hayhurst Chartered Town Planner
 St Johns Church
 Colchester Access Group
 Atkins Telecom
 P Tuckwell Ltd
 ASM Logistics
 Trevor McHugh Planning and Regeneration Consultant
 Robinson and Hall
 St Mary's Church
 Colchester Cycling Campaign
 British Telecom
 Riverside Residents Association
 Bidwells
 Wivenhoe Conservation Area
 Jehovah's Witnesses Planning Consultant
 Twenty 16 Design
 TACMEP
 Ray Chapman Associates
 Sustrans
 Pomery Planning Consultants
 Fusion Online Ltd
 Taylor Wimpey
 Bellway
 Persimmon Homes
 Rose Builders
 Harding Homes
 Hopkins Homes
 Bellway
 Castle and Roman Road Residents Association
 Dutch Quarter Association
 Colchester Association of Local Councils (CALC)
 Colchester Baptist Church
 David Miller Associates
 Siting Strategy Admin Officer Office for Nuclear Regulation
 Lexden Restorations Ltd
 Strood WI
 Haven Gateway Partnership
 South East Local Enterprise Partnership
 Kirkwells
 Peacock & Smith

Help the Aged
McLean Design Services Ltd
Ringway Group Ltd
The Rose and Crown Hotel
The Royal Association For Deaf People
RWCL
Sloppy Joes
Gypsy & Traveller Law Reform Coalition
Catten College
Mersea Homes
Colchester Croquet Club
Hythe Residents Association
Lexden Restorations Ltd
Indigo Planning
Britannia Storage Systems Ltd
Mayfair Investments
Colchester & District Jewish Community
Countryside Properties
Colchester Civic Society
Mumford & Wood Ltd
Hills Residential Ltd
Beaumont Seymour & Co
Colchester Mind
BAP Transport Ltd
La Farge Aggregates Ltd
Hall Duncan Associates
Flakt Woods Ltd
Bidwells
Addendum Ltd
Colchester Learning Shop
James & Lindsay Life & Pensions Ltd
CAPITA
BDG Design (South) Ltd
Marguerite Livingstone Associates
Ramblers Association - Colchester
Corporate Associates Ltd
Loofers Food & Coffee Place
Newman Commercials
R G Carter Colchester
The Food Company
Pertwee Estate Ltd
Scott Wilson
HLL Humberts Leisure
Dedham Vale AONB Project
The JTS Partnership
Sales Manager
Nathaniel Lichfield & Partners
Strutt & Parker LLP
Nicholas Percival
Fisher Jones Greenwood
T J Evers Ltd
Orchard Baptist Church
LCO Consulting Ltd
Hutton Construction Ltd

Hanover Bloc
FFT Planning
Fusion Online Ltd
Evolution Planning
Beacon Planning Ltd
Commercial Estates Group
CPBigwood
BREEAM
Martin Robeson Planning Practice
Whirledge & Nott
Essex Wildlife Trust
Rapleys LLP
WYG Management Services
Lovemyland
Januaries Consultant Surveyors
The Coast Road Association
CALC
CF Anderson & Son Ltd
Freight Transport Association
Long Tall Sally
Prettygate Library
Tiptree Library
West Mersea Library
Colchester Rural Age Concern
Planning Design Building Consultant
The Craftsman
Army Welfare Services
F & C Commercial Property Holdings Ltd
Goojerat Barracks
The Planning Bureau Ltd
Tesco Stores Ltd
Friends of the Minorities
Stanway Library
Dr D Bateman & Partners
The Strood WI
Wivenhoe Dental Practice
Priory Residents Association
Smythies Avenue Residents Association
Transco
Merchant Projects
Keith Mitchell Building Consultancy Ltd
Federation of Small Businesses
St Johns Residents Association
Colchester Bus Users Support Group
C2 Fire Protection
Planware
Mersea Island Society
Chartered Surveyors
Purcell Miller Tritton
Defense Estates
Underwoods of Colchester
Chairman Mersea Island Trust
Prettygate Dental Practice
Turners for Men & Women Ltd

Atisreal UK
Stanway Residents Association
Colchester Friends of the Earth
Essex & Suffolk Gliding Club
Welshwood Park Residents Association
Entec UK Ltd
Morley Richards & Ablewhite
Headteacher Phillip Morant School
Goojerat Barracks
Womens National Commission
Rennison Consultants
AMPRESS
Essex County Council
Phase 2 Planning
Strutt & Parker
Barton Willmore
Robinson & Hall LLP
Boyer Planning

Layer Road Surgery
Colchester Institute
Godden & Rudling Building Services
Royal Yachting Association (Eastern Region)
Seatrade
St Johns Ambulance
Allegro Music
Essex Fire & Rescue Services
Rollerworld
Wivenhoe Sailing Club
Headteacher The Gilbert School
Shea Properties
Chairman/General Secretary J Sainsbury Veterans Colchester
Priory Residents Association
Wivenhoe Dental Practice
The Strood WI
Dr D Bateman & Partners
Fairhurst