



WIVENHOE NEIGHBOURHOOD PLAN 2017 – 2032

CONSULTATION STATEMENT

December 2017 - (Final)

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1 Introduction

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Wivenhoe Neighbourhood Plan (WNP).

The legal basis of this Consultation Statement is provided by Section 15(2) of Part 5 of the Neighbourhood Planning Regulations 2012 (as amended), which requires that a consultation statement should:

- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- explain how they were consulted;
- summarise the main issues and concerns raised by the persons consulted; and
- describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.

The policies contained in the WNP are the result of interaction and consultation with the community and businesses within the parish. Work has involved community groups over approximately four years, as well as surveys, public meetings and events. This has been overseen and coordinated by the WNP Steering Group. Views and interactions from this process led to the Vision and Objectives statement which formed the basis for the key policies set out in the WNP.

2 Organisational structure of the Wivenhoe Neighbourhood Plan

Wivenhoe Town Council as the Qualifying Body set up a Steering Group to gather and reflect the views of the community and to lead the work on the Wivenhoe Neighbourhood Plan.

The Steering Group consisted of 12 volunteers from the community including 2 Town Councillors. Another forty volunteers from the community supported the Steering Group with analysis work and, in eight working groups, with the development of proposals for the WNP.

In January 2015 the working groups were re-configured into three new groups: Land Use & Zoning, Communication & Community Engagement, Plan/Policy Writing group. Each group consisted of Wivenhoe Town Councillors, steering group members and volunteers from the community. A Community Engagement and Communications group was also formed.

The Steering Group met monthly and meetings were open to residents. All minutes of meetings held throughout the preparation period were published on the website

www.wivenhoeneighbourhoodplan.org.uk/document-register/wnp-steering-group/

3 Consultation Process

The following surveys and consultations were undertaken from 2013 to 2016.

- A Neighbourhood Plan Open Day July 2013
- Simple questionnaire for Wivenhoe youth at the WivKids event July 2013
- A month-long on-line survey of commuters in August 2013
- Engagement project with Primary school age children through Broomgrove Junior school in September 2013
- A 12-page questionnaire distributed to 3,750 households in Wivenhoe in November 2013
- A Business Breakfast for local businesses in February 2014
- A survey of Secondary school age children organised through Colne Community School and College, held in June 2014
- An on-line survey of Essex of University students living on campus and in Wivenhoe, June 2014
- A community consultation day on initial proposals from the working groups, November 2014
- on-line consultation on the Vision and Objectives document, March 2015
- Many informal pop-up consultations at local events Spring/Summer 2015
- Public consultation on proposed housing development sites, July 2015

3.1 2013 Consultation and engagement events

The Neighbourhood Plan [Open Day in July 2013](#) was the first opportunity for the community to find out about the NP. Flyers announcing the event had been distributed house-to-house and notification given in the local press and on the Town Council website. Posters were displayed around the town and on the Town Council's notice boards.



At the Open Day a series of boards on the wall of the William Loveless hall invited visitors to give a view on a range of topics, e.g. Community Facilities, Employment, Environment, Transport, Housing, Problem Sites, by means of post-it notes stuck on sheets by the boards and to give their views on what was good and bad and what they felt was important for the town. Members of the Steering Group and officers of Colchester Borough Council Planning Department were in attendance throughout the day to talk residents through the concept of a Neighbourhood Plan and answer questions. All post-it note comments were collated and analysed.

The [survey at the WivKids event](#) (a sport & activity event organised annually by Wivenhoe Town Council) asked under-14 year-olds how they spent their leisure time, and their opinions on facilities for those activities in the town.

[Junior school pupils expressed their vision for Wivenhoe](#) in a Wivenhoe Wishes project organised by the school.

A month long SurveyMonkey survey was held amongst commuters on the same topics as the Open Day survey.

After analysis, the above consultations identified eight areas of concern to residents.

The Steering Group expanded these into an **eight-subject, 12-page questionnaire** that further drilled down into those areas. The questionnaire was delivered to 3,750 households in November 2013. It was accompanied by an introductory flyer and a pre-paid postal return envelope. In

addition four submission points for returns were set up in the town.

Local Radio Wivenhoe ran an interview feature publicising the survey each day for a week.

The survey achieved a response rate of 29%.

[Analysis of the survey](#) was completed in early 2014. The full results of the November 2013 survey were announced on the WNP website, the Wivenhoe Council website and via Twitter and the Wivenhoe Forum, and made available on-line.

Main Issues and concerns raised in the 2013 consultations:

Survey findings:

50 youngsters under 14 years old took part in the WivKids survey in July 2013. More than half of those who said they participate in structured sports replied that they had to go outside Wivenhoe for this.

980 Households responded to the November 2013 questionnaire: 70% paper returns were received and 30% directly on-line. There were questions on eight categories.

What is Wivenhoe like as a place to live?

Good or Excellent was the majority response to this question (85%). To the question: “what if anything would you want to change?” overwhelmingly ahead of everything else was the issue of roads and traffic: congestion, parking and speeding.

Residential Development and Land Use

One-third of all respondents felt that no more houses of any type should be built. Nevertheless, a majority of respondents identified the cost of housing and lack of suitable types of housing as obstacles to moving house within Wivenhoe, and to accommodating the needs of the young and the elderly.

Traffic and Transport

The top three issues here were:

1. congestion and parking on The Avenue/High Street;
2. road safety and lack of enforcement of regulations;
3. access and parking in other areas of the town. There was support for better cycling routes/paths. Access to the railway station was criticised as inadequate.

Economic Development and Business

A need for local jobs was identified (42%). Those who work from home either now (23%) or likely to do so in future (13%) cited improved IT connections – faster broadband, better mobile phone connections, and an internet cafe – as the greatest support needed.

Community facilities

There were calls for a wider variety of shops and services. 52% of respondents felt there was a shortage of community buildings. Extra provision was required for a Youth Club, Adult Education and Social Events. Only 13% of respondents felt there were sufficient facilities to support family life. 41% said that they had to look outside the town for sports and leisure facilities and 58% said that a new cemetery was needed.

Infrastructure, Energy and Recycling

Solar panels on houses came tops in the alternative power question but the idea of industrial wind turbines in Wivenhoe would be resisted by just under half of respondents. Mobile phone coverage is an issue in Wivenhoe but 52% of those who answered this question did not want a phone mast built.

University

Just over one-third of respondents use, attend or work at the university. Despite its proximity, the majority (60%) of those who travel to the university do so by car. Although the University is the town's major employer, a majority felt there was a lack of engagement with the town.

Countryside and Environment

Answers generally indicated a great fondness for and awareness of Wivenhoe's rural environment and setting, and a belief that it must be protected and managed in a variety of ways. Fears were expressed for the future loss of this environment.

3.2 2014 Consultations and Engagement events

With the assistance of the Wivenhoe Business Association its members were invited to a Business Breakfast on 14 February from 8 – 9 am. 33 business men and women responded.

Three questions had been prepared and [comments analysed](#).

In May 2014 we carried out an 8-question on-line survey among the 11-16 yr olds who attend Colne Community School in Brightlingsea, a comprehensive school which the majority of Wivenhoe's children attend as the two local junior schools are feeder schools to The Colne. 268 pupils took part. The [analysed results](#) were placed on line.

A small on-line survey was attempted among Essex University Students. Results became available in June 2014. Of the 49 respondents only 19 lived in Wivenhoe. Too many questions were skipped to make the survey statistically significant.

The Steering Group had a presence at Local Annual summer events (Open Gardens, Quilting Exhibition, June Market). A 12-page printed Digest of the November 2013 Household Survey was distributed to a large number of locations including schools, surgeries, pubs, shops, library, Town Council offices.

A public consultation on 22 November 2014 in the William Loveless Hall presented proposals for the WNP that had been brought forward by the eight working groups. Publicity was given in the 3 newspapers, on posters and on WTC and WNP websites and other social media including the Wivenhoe Forum. 37 Local organisations including the three schools were contacted and asked to cascade the information. The format adopted was similar to but more extensive than that of the Open Day in July 2013. Visitors were presented with a number of emerging proposals across the thematic areas of Economic & Business Development; Countryside, River & Environment; Community facilities & Leisure activities; Heritage & Townscape; Infrastructure needs; Traffic & Transport, the University and Residential & Land use.



A set of eight proposed Site Allocation Criteria was presented to aid comments on the additional question: Where should houses be built and where should they not be built?

All material was displayed on headed boards around the hall. Visitors were invited to comment using Post-it notes.

Around 230 residents attended and another 1400 comments were entered on-line.

The Over-60 group was consulted at an afternoon tea on 21 November.

Also on 21 November, a consultation lunch was held at which local business people and councillors, university representatives and councillors from Colchester Borough and Tendring District attended.

All [written comments](#) and the full [consultation report](#) were placed on line.

Main Issues and concerns raised in the 2014 consultations:

Survey findings:

The Business Breakfast in February 2014 revealed concerns about low footfall which was thought to be linked to inadequate parking facilities. Another issue was the lack of availability of affordable shop and office space, and high business rates.

The June 2014 secondary school pupils survey made clear that the single most important issue for this age group was a lack of local age-appropriate facilities to meet and socialise. The university students survey highlighted a lack of awareness of/interest in most things in Wivenhoe other than the scenery and occasional use of pubs and restaurants.

22 November 2014 consultation on proposals for the WNP. This focussed on the proposals that had emerged from the working groups across the thematic areas of Economic & Business Development; Countryside, River & Environment; Community facilities & Leisure activities; Heritage & Townscape; Infrastructure needs; Traffic & Transport, the University and Residential & Land use.

In general there was agreement with all but one (i.e. creation of a new business park) of the proposals although many comments and suggestions for changes were made.

The views expressed in the on-line consultation that ran in parallel with the 'live' consultation were consistent with those expressed in the hall.

Respondents were also given the opportunity to comment on 1. Locations for new housing development: where it should, or should not go? and 2. Location of green spaces considered important.

The findings from all feedback were collated and used by the Steering group for the development of Vision and Objectives, site allocation criteria, and the first draft of the plan.

3.3 2015 Consultations and Engagement events

In January 2015 a Communications & Community Engagement group was formed. Its brief was to publicise the WNP with regular updates to the residents.

March 2015 saw the publication of the Vision & Objectives document by the Steering Group and feedback from the community was invited on the WNP website. The publication was advertised on the WTC website's news page; circulated by group email to 38 local organisations, some of which further published it on their own websites; the local schools cascaded the information through parent mail; Facebook and Twitter both carried the news of and links to the document;

information and a link were posted on the Wivenhoe Forum which then had 1500 members. Pop-up events were held at the local schools, the Farmers Market and the annual Open Gardens event.

At the very popular annual day-long Wivenhoe Regatta on 6 June 2015 the Steering Group had a stall on the Quay and introduced residents to the four proposed housing development sites. This event was a lead-in to the **consultation on housing sites held at the William Loveless Hall on 11 & 12 July 2015.**

Publicity of the July consultation was given by leaflet circulation to 37 societies and the schools, a letter to local landowners. Particular care was taken to inform residents who live on sites adjacent to two of the proposed sites and these were alerted to the consultation by door to door leafleting in Heath Road and Field Way. Articles were produced for the local press and a pop up event held at Broomgrove School Summer Fair in order to engage parents with children of school age. WTC and WNP websites both carried announcements and a Youtube publicity video was produced.

The consultation took the form of boards that displayed the four proposed sites. 152 Residents visited during the weekend and were provided with stickers in order to give an indication of their strength of agreement or disagreement on the number of houses to be built on each of the four proposed sites. Provision was made to record further comments, particularly where there was strong disagreement. Face-to-face consultations continued at pop-up locations through the town.

Main Issues and concerns raised in the 2015 consultations

At the July 2015 consultation residents were invited to comment on the four proposed housing development sites. In general there was agreement with the site proposals. The main concerns expressed were about the sufficiency of infrastructure (roads, medical provision and school places) and the likely increase in traffic of any new development. A [report of this consultation](#) was placed on line.

3.4 2016 Consultations and Engagement events

The first completed draft of the Plan was presented to the community for [informal consultation on 13 February 2016](#). A press release was distributed to local newspapers, the event was advertised on WTC and WNP websites, on social media and on posters around the town. **Some** Statutory consultees, and all landowners as well as residents and local organisations were notified. Promotional material was distributed to pubs and elsewhere.

Copies of the draft Plan were deposited at WTC offices and in Wivenhoe library and also made available in downloadable form.

A Summary at one third the length of the full draft was similarly made available.



A5 leaflets with just one-line policies followed by a key phrase were used as entry points to conversation.

The consultation was held in two locations around the town, the William Loveless Hall and the Cricket Club. Members of the Steering group attended at each location. The emphasis of the consultation was on feedback. Comments on the day were noted down.

That written feedback could be sent to WTC offices and website feedback facilities was regularly highlighted on the Wivenhoe Forum and other social media.

Feedback was encouraged before 14 March.

All feedback from Landowners, Residents and Statutory Consultees after this February 2016 consultation were captured in the three tables displayed below.

1. Comments from Land Owners

Submitted by	Comment by Land Owners	Action taken
<p>Brian Morgan representing Mersea Homes Ltd</p>	<p>My name is Brian Morgan from ADP Ltd, Architects and Chartered Town Planners based in West Bergholt. We represent Stuart Cock, the Managing Director of Mersea Homes who have options over land to the East of Colchester, mostly north of the A133. Although not a Wivenhoe resident Stuart thought it might be useful to make some comments regarding the land under his control which falls within the Neighbourhood Plan's area and is amongst the options being considered for development in the emerging Local Plans for both Colchester and Tendring Councils.</p> <p>Your Neighbourhood Plan Committee will know that Colchester and Tendring Councils are considering a joint project including land in the East of Colchester and the West of Tendring which at this stage is being considered on the basis of a general location for development to deliver a new community which will cater for University expansion, support significant public transport initiatives and regeneration opportunities for both the Hythe area and Tendring District. This will be a Local Plan led initiative which will be the subject of local consultation if the project becomes a Preferred Option when the announcement is made in June.</p> <p>We recognise the draft Neighbourhood Plan's key objective of retaining the Town's rural setting with green gaps and strategic landscaping along key access roads. These objectives will sit well within the context of the proposed 'Garden Settlement'</p>	<p>Reply letter sent 20 March 16.</p> <p>Thank you for your recent email, the contents of which we discussed at our Neighbourhood Plan Review Group meeting on Monday, along with other comments and observations on the draft Plan that we have been receiving during this informal consultation period.</p> <p>We well remember the visit you and Stuart Cock made to see us in Wivenhoe on 27th November 2014.</p> <p>We have also noted from your email that you are still proposing to 'deliver a new community which will cater for University expansion, support significant public transport initiatives and regeneration opportunities for both the Hythe area and Tendring District'.</p> <p>We have indicated in Figure 12 a coalescent break of indeterminate width between the existing community of Greenstead and Longridge Park with this new community which you are proposing on this land. We are confused though when you later say 'The proposal to the east of Colchester is considered in the context of being an urban extension and not a separate settlement'. Surely it cannot be both a new community and an urban extension? If the area is to be developed we would favour a new community with its own identity although it would naturally have to look to Greenstead for its educational needs, initially at primary level and possibly on a more permanent basis at</p>

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	<p>being jointly considered by the Councils in which landscaping will obviously be a key element. We also recognise local ambition to see more public open green space north of the A133.</p> <p>Master planners are being appointed by the Councils to advise on a range of issues which will include the protection of areas which contain important biodiversity linked by significant green corridors. However, the scale of open space indicated in Fig 12 is tantamount to a green wedge normally used to retain the individual character of existing separate settlements. The proposal to the east of Colchester is considered in the context of being an urban extension and not a separate settlement. An overly large separation would have the effect of artificially extending foot and cycle links and thus discourage sustainable transport modes and discourage the use of new community facilities within the development by existing residents. We believe the area should be restricted to the existing Local Nature Reserve as indicated on Fig 22.</p> <p>We would also object at this stage to the WIV 2 (ii) policy as this could prejudice the future planning of the area.</p> <p>In addition we would recommend that there is greater clarity on what the 'Settlement Area' is i.e. we assume it to be the settlement boundary as indicated on Map 1.</p> <p>Generally the draft Wivenhoe Neighbourhood Plan appears as a well-considered document based on significant local consultation, accordingly we expect it will be a great success.</p>	<p>secondary level.</p> <p>This coalescent break could just be the area already designated as a Nature Reserve or expanded to provide a clear separation between these two distinct communities. Guidance on garden settlements in the Borough Issues and Options consultation is that a clear separation break should be provided to prevent urban sprawl. Because we have been advised by CBC that they have considered this area as a strategic development site, we have not felt it necessary to define this break in more specific terms.</p> <p>We are obviously glad that you have recognised our key objective of 'retaining the Town's rural setting with green gaps and strategic landscaping along key access roads' and that 'these objectives will sit well within the context of the proposed 'Garden Settlement' being jointly considered by the Councils in which landscaping will obviously be a key element'.</p> <p>We are certainly keen to retain the existing wild-life sites in this area and we presume that Master Planners would also want to plan any Garden Settlement around them. It would obviously be nice to see more public open green space in this area north of the A133 but we have not specifically indicated this in our draft Plan.</p> <p>We are a little surprised that you feel there is need for greater clarity on what the Settlement area is. Policy WIV 2 refers to the Wivenhoe Settlement area. This is the area</p>

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		<p>defined on the Proposals Map and is the residential area of Wivenhoe Parish. We will make more clear though in Para 4.4.</p> <p>Regarding our Policy Wiv2 (ii) we feel that this already sufficiently broad. This says:</p> <p><i>Wiv2 (ii): A strip of land adjacent to the A133 must be planted with a tree belt to preserve the rural approach to the Wivenhoe settlement area; and</i></p> <p>Although we have suggested elsewhere in the text this tree belt should be 30m wide, we have not included this figure in the policy itself and therefore there is scope for you to argue that a tree belt of a lesser width would be capable of preserving the rural approach to Wivenhoe. This seems to us to also meet your objective of promoting this new development as a Garden Settlement.</p> <p>It will certainly be helpful to us both to see the draft Local Plan when it is published in June. CBC are certainly aware of what we have written in our draft Plan so far. It is for this reason I am copying this letter to Karen Syrett and Chris Downes in CBC's Planning Policy Department.</p>
Boyer Planning representing East of England Co-op	Objection to draft Policy Wiv 21, Cedrics site re-designation as for mixed development	Policy Wiv21 to be amended to: “ This site has permission for residential development but proposals for a mixed use scheme which is sympathetic to the surrounding area will also be supported”.
Jones & Whymark	I notice that the land, title number EX96575, for which	Reply letter 3 March 2016.

Submitted by	Comment by Land Owners	Action taken
16 February 2016	<p>ourselves and the Wivenhoe Housing Trust were proposing to build on, is not identified for proposed building in the latest Wivenhoe Neighbourhood Plan.</p> <p>We would therefore request this is added to this plan, as the Colchester Borough Plan for 2017-2032 site plan number 048.</p> <p>Could I ask you to please confirm this will be done.</p>	<p>Reference your letter of 16th February, I confirm that the contents of your letter have been considered by the Neighbourhood Plan Sub-Committee that I am leading.</p> <p>This committee is considering all of the comments we are receiving about the draft of the Wivenhoe Neighbourhood Plan that we made public recently.</p> <p>The committee has agreed to keep the present draft Plan as it is and not to extend the settlement boundary to allow any further building in this part of Wivenhoe.</p> <p>The land which you and others own is part of the area which is presently zoned as Open Space and has been so for quite a long time. It is also included in the Coastal Protection Belt which precludes any further development within this zone. The Committee members also felt that given the level of local opposition to any building in that area, as it is considered to be part of Wivenhoe Woods and Nature Reserve, there is no justification for changing the present zoning.</p> <p>The original premise on which Colchester Borough Council planners gave a view that building homes for older people could be possible on an 'exception site' basis for was withdrawn when they realised that Wivenhoe was too large a settlement for these planning rules to apply.</p> <p>I am sorry to disappoint you with this decision of the Committee.</p>

Submitted by	Comment by Land Owners	Action taken
<p>Andy Butcher, Strutt and Parker, for Mr Gooch 18 March 2016</p>	<p>Strutt and Parker act on behalf of Mr Charles Gooch, local farmer and owner of land at Elmstead Road and Land Behind the fire station. These two sites are proposed for allocation in the Wivenhoe Neighbourhood Plan (WNP) (Draft policies WIV29).</p> <p>The purpose of this letter is to set out our general comments and support for the draft WNP but with specific comments on the proposed housing allocation policies for the two sites.</p> <p>General Comments.</p> <p>1. The Government's National Planning Policy Framework (NPPF) confirms the objectives for neighbourhood plans and we are pleased that the draft WNP closely reflects those aspirations to help shape the vision for the town.</p> <p>My client, as a local landowner with the key interest in two of the proposed housing allocations, is committed to continue to work in partnership with the Steering Group for the WNP and local community in bringing forward the proposals for the two sites to help deliver the homes and associated infrastructure that have been identified in the draft WNP.</p> <p>2. We note that the Steering Group for the WNP have undertaken extensive work to establish the needs for Wivenhoe with a thoroughly researched evidence base to support and justify the proposed policies and allocations in the WNP. It is also helpful that the Steering Group have engaged with my client to establish the opportunity to bring forward the proposed housing allocations for WIV29. It is of course a</p>	<p>Reply letter sent 23 March 16.</p> <p>Thank you for your letter of 18th March concerning the present informal consultation on our draft Neighbourhood Plan in which you have provided comments on it. The Plan Review Group has been able to review these comments and I provide our responses to them below.</p> <p>6. We must apologise for there being two site allocations numbered WIV29. This was an editing error. The Land behind the Fire Station is now labelled WIV30 in the revised draft.</p> <p>7. Regarding CBC input (your paragraph 3): <i>Your letter said: As a draft neighbourhood plan, we are confident that the views, input and advice of Planning Officers at Colchester Borough Council will also be taken into account in finalising the precise wording of the policies to ensure that they are clear, positive and capable of being delivered in accordance with the NPPF and accompanying Planning Practice Guidance (PPG).</i></p> <p>Our response: We have worked closely with CBC planners who have reviewed the plan informally as it has gradually progressed towards the current stage.</p> <p>CBC will also conduct a formal review at the pre-submission stage. There has also been input from Chris Bowden of Navigus Planning to ensure that our policies are consistent with both the CBC Local Plan and national requirements.</p> <p>8. Overall housing numbers and housing types (paragraphs 4, 5, 7, 11)</p>

Submitted by	Comment by Land Owners	Action taken
	<p>fundamental requirement that the policies and allocations contained in the neighbourhood plan are deliverable to meet the basic conditions and this depends critically on landowners views.</p> <p>3. As a draft neighbourhood plan, we are confident that the views, input and advice of Planning Officers at Colchester Borough Council will also be taken into account in finalising the precise wording of the policies to ensure that they are clear, positive and capable of being delivered in accordance with the NPPF and accompanying Planning Practice Guidance (PPG). Housing Allocations – WIV23</p> <p>4. Having regard to our comments at 3 and, as far as draft policy WIV23 and the housing allocations at Section 17 are concerned, we note that the draft WNP seeks to impose a cap on the amount of housing by setting a “maximum” number of housing units. We acknowledge that this is suggested to be necessary because of issues with the local primary school and constraints on suitable sites. However, this approach is questionable given the NPPF requirement to plan positively for development. We are aware, for instance, that the Independent Examiner on the Woodcote, South Oxfordshire Neighbourhood Plan found that “the imposition of a maximum figure for housing creates a significant and fundamental conflict with the NPPF”, considering this to be an inflexible and inappropriate approach to sustainable development. The Examiner’s recommendations were that the number of houses</p>	<p><i>Your paragraph 4: Having regard to our comments at 3 and, as far as draft policy WIV23 and the housing allocations at Section 17 are concerned, we note that the draft WNP seeks to impose a cap on the amount of housing by setting a “maximum” number of housing units. We acknowledge that this is suggested to be necessary because of issues with the local primary school and constraints on suitable sites. However, this approach is questionable given the NPPF requirement to plan positively for development. We are aware, for instance, that the Independent Examiner on the Woodcote, South Oxfordshire Neighbourhood Plan found that “the imposition of a maximum figure for housing creates a significant and fundamental conflict with the NPPF”, considering this to be an inflexible and inappropriate approach to sustainable development. The Examiner’s recommendations were that the number of houses should be represented as a “minimum” or “at least”.</i></p> <p>Our Response: The NPPF requires planning for positive sustainable development. For Wivenhoe the constraint on school places is one of the factors relevant to sustainability. It should be noted that the adopted Thame Neighbourhood Plan prescribes a precise number of dwellings for each allocated site. Thame is a settlement comparable to Wivenhoe in size and nature. It is perhaps worth re-iterating the logic behind the overall cap of 250 over the 4 allocated sites set out in paragraph 16.19 of the draft as this is relevant not only to the overall number but also to our prescriptive approach to housing types which you mention in</p>

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	<p>should be represented as a “minimum” or “at least”.</p> <p>5. The Examiner also confirmed that this approach does not mean that “any development goes” and that policies in the NP and those set out nationally and locally would still control development. By expressing numbers as a minimum does not mean that additional sites would need to be allocated so long as the Borough Council are satisfied that the allocations meet the needs arising from the adopted/emerging strategic policies of the development plan.</p> <p>6. As far as the WNP is concerned and in response to the reasons set out for imposing a maximum we would suggest that the issue of school capacity would need to be reviewed as detailed proposals/applications come forward for sites. Similarly detailed planning applications would need to be accompanied by evidence as part of the normal submission and determination process to address any possible constraints.</p> <p>7. It may be that the WNP can recognise that these issues will need to be addressed in the supporting text at 16.1. However, against this background and subject to the Borough Council’s comments on this point, we would respectfully suggest that draft policy WIV23 and the Site Allocation policies set out in Section 17 should be amended to express housing numbers as a minimum.</p> <p>Draft Policies WIV29</p> <p>8. As indicated above, our client is the landowner of the sites proposed for allocation at Elmstead Road and Behind the Fire</p>	<p>paragraph 11 of your letter.</p> <p>Extract from the Draft Plan (version February 2016)</p> <p>16.19 <i>The County has a formula for the number of primary school places generated by housing developments depending on the size and nature of the dwellings. One bedroomed properties and dwellings designed specifically for the elderly are assumed not to generate demand for primary places. If all new housing consisted of family homes then the 78 school priority areas would be adequate to service about 260 new dwellings.</i></p> <p><i>There are current planning permissions in place for 31 dwellings in Wivenhoe Parish and it is likely that there will be some infill over the plan period. This number can only be a guess. In total it is assumed that there will be about 60 additional dwellings arising from existing permissions and infill.</i></p> <p><i>As outlined in 16.9 above, the intention is to focus new development on smaller homes and homes designed for the elderly which is less likely to give rise to a need for school places. However, if these new properties encourage older residents to downsize this will result in freeing up of family housing so there will be indirect demand for school places. It is considered that 250 new homes (giving around 310 new homes over the plan period) could be built on the four sites listed below consistent with the school places constraint.</i></p> <p>Discussions with Essex County Council made it clear that the</p>

Submitted by	Comment by Land Owners	Action taken
	<p>Station, both given the reference WIV29. We would suggest that, for the sake of clarity, it would be useful that each site has its own reference.</p> <p>9. We acknowledge and support the caveat to the proposed allocations at 17.2 of the Draft WNP. This states that that the potential community gains expressed in the requirements of the policies applying to the sites “have yet to be finalised with the landowners”. This is considered to be important for the reasons set out below and having regard to Paragraph 0.42 of the PPG.</p> <p>This confirms that there should be an “appraisal of options and an assessment of sites (proposed for allocation in neighbourhood plans) against clearly identified criteria.” The relevant elements of the Guidance then goes on to highlight that this should confirm that sites are suitable, viable to realistically deliver development and, in the case of these sites, capable of supporting the community gains identified in the draft WNP.</p> <p>10. Whilst we are broadly supportive of the objectives of the Draft WNP for the two sites at WIV29, at this stage of the process we have some concerns that, as drafted, the policies are over prescriptive and inflexible. This is particularly important as we are mindful that further work will be necessary on:</p> <p>Practicality and deliverability of all aspects of the components of the proposed development as set out in the policies.</p>	<p>County’s policy is not to increase capacity in a school in a way that would result in mixed aged teaching so incremental adjustments to school capacity are ruled out. To justify an additional primary school about 900 new homes would have to be built and this level of development would not be sustainable for other reasons.</p> <p>Your paragraph 6 suggests that issues of school capacity should be left to the detailed planning application stage. Here we must disagree. The Plan is proposing a total number of dwellings over the Plan lifetime. We assume development will not all happen instantly. A piecemeal approach to the availability of school places could result in there being inadequate educational facilities to satisfy demand generated for sites where the actual planning application is made later in the Plan period.</p> <p>The point of planning is that it takes a synergistic and holistic approach.</p> <p>Paragraph 11 queries the very specific housing mix requirements for each site. The overall housing mix in the Plan is based on survey data, demographic information and data on the existing housing stock.</p> <p>As explained in the Plan, family homes are overrepresented in the current housing stock relative to Wivenhoe’s needs. Smaller starter homes and homes for our ageing population are required. We have set targets for the combined sites and, in order to meet these, it is necessary to specific requirements for individual sites. The paragraph also makes reference to “market signals”. We are confident that there would be a market for the housing types suggested. Wivenhoe is a popular place.</p>

Submitted by	Comment by Land Owners	Action taken
	<p>The scale of the likely planning obligations and other costs associated with each of the two sites.</p> <p>11. By way of explanation, the delivery of the very specific detailed requirements on tenure/mix and size of units, whilst certainly informed by the work on establishing local needs for the draft WNP, will also need to take account of market signals having regard to paragraph 16 of the PPG. As work progresses on the WNP it is therefore also considered important to establish or make a distinction whether all the specific requirements are necessary so as to be expressed within the policy itself or desirable which ought to be expressed in the supporting text to ensure or provide certainty on the acceptability and achievability of development having regard to the local market considerations.</p> <p>12. In terms of viability it will be important to ensure that the planning obligations necessary or sought as part of the policies are realistic, achievable and clearly expressed so as not to compromise the deliverability of the development in accordance with the PPG. There is some ambiguity and uncertainty with the policies so far drafted. For instance, on the Land at Elmstead Road it is suggested that a planning permission will require a cemetery and associated works; is it the case that the developer is responsible for provision or is it intended that the land is provided?</p> <p>13. Finally we would suggest that the Proposals Map will need</p>	<p>Another factor in the housing mix relates to the school capacity constraint. If all the development was for family housing then this would generate more demand for school places. It is only by specifying that some housing will be specifically for older people and some will be relatively small that the overall target of 250 has been adopted. If the mix were to shift towards family homes then the overall total of 250 would have to be reduced.</p> <p>9. Viability paragraphs 9, 10, 11, 12 The caveat mentioned in paragraph 9 comes from an earlier version of the draft Plan. The draft Plan as posted for consultation is available on our web site. In case you haven't got it, it is available by clicking on the link below. http://wivenhoeneighbourhoodplan.org.uk/wpcontent/uploads/2016/02/WNP-REPORT-10-SIGNOFF-LOW-RES.pdf</p> <p>It now contains the following statement in 17.2 as we believed the community benefits had been agreed. <i>17.2 In return for allocating sites for residential development, relevant landowners have committed to offering land for public benefit as sports pitches, play areas, allotments, and a new cemetery as well as new footways and cycletracks. In addition, new housing will attract a cash contribution to community facilities. These commitments are contained in each policy relevant to each site.</i></p> <p>10. Paragraph 10 has the statement: <i>we have some concerns that, as drafted, the policies are prescriptive and inflexible. This is particularly important as we are mindful that further work will be necessary on:</i></p>

Submitted by	Comment by Land Owners	Action taken
	<p>review, for instance on agreeing the most appropriate location for a cemetery at Elmstead Road in terms of accessibility, site area and impact.</p> <p>14. Finally we would suggest that several of the site specific criteria set out in the policies that have to be satisfied contained within the wording of the policies or the allocations would or will be normal requirements of Borough Council planning policy (e.g. highways, pedestrian and vehicular accessibility wildlife surveys, landscaping, lifetime homes) and it is questionable whether such matters ought to be in the policies or perhaps referred to in the supporting text.</p> <p>To conclude, my client is committed to working in partnership in bringing forward proposals for the two sites at WIV 29 to assist meet the aspirations for the WNP and local community. Equally, it will be important to ensure that the policies to go forward in the WNP meet the basic conditions test to ensure that the plan is robust and able to deliver what has been set out.</p> <p>In this respect, following consideration by the Steering Group and the advisors to the Group on the comments and feedback from this consultation relating to these matters and those raised by the local community, my client will be happy to commission the necessary preliminary work to address issues of viability and deliverability to help inform the policies as the WNP progresses.</p> <p>Please do not hesitate to contact me if any matters in this letter</p>	<p><i>4. Practicality and deliverability of all aspects of the components of the proposed development as set out in the policies.</i></p> <p><i>5. The scale of the likely planning obligations and other costs associated with each of the two sites.</i></p> <p>We note these reservations but also note that there are no obvious remedial works on either of these sites that are likely to add to the cost of developing these sites. We suggest that arguments concerning practicality and deliverability of all aspects of any proposed development as set out in the policies should be dealt with at the Planning stage with the officers and members of Colchester Borough Council.</p> <p>11. Paragraph 11 includes: <i>whilst certainly informed by the work on establishing local needs for the draft WNP, will also need to take account of market signals having regard to paragraph 16 of the PPG..... it is therefore also considered important..... to ensure or provide certainty on the acceptability and achievability of development having regard to the local market considerations.</i></p> <p>We suggest the same applies to this observation likewise. That is, argue the case with the Planning Officers why local market conditions are such that the objectives of the Plan for that particular site are not deliverable.</p> <p>12. Response to both Para 10 and 11:</p> <p>The issue of housing mix is discussed above in the context of demand for school places. Wivenhoe has a high proportion of larger, family homes. An objective of the Neighbourhood Plan is to address this imbalance in a small way and also to provide for an ageing population. Developers would probably make more</p>

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	<p>require further clarification and we look forward to continued engagement with the WNP Steering Group and local community to help progress the Neighbourhood Plan.</p> <p>Yours sincerely Andy Butcher Dip Tp MRTPI Associate Partner</p>	<p>money by building family/executive homes but demand for all types of property is high in Wivenhoe.</p> <p>Given the two sites are both greenfield sites with no remedial requirements and are adjacent to existing roads, we would not anticipate any viability issues with the housing mix, and believe that the community benefits required are relatively modest.</p> <p>The provision for affordable housing is in line with Borough Policy. If there are any exceptional viability issues, then the percentage of affordable housing will be something to discuss with the Borough at the time any planning application is made.</p> <p>13.Paragraphs 12 and 13</p> <p>The draft Plan states for the Elmstead Road site that: <i>a cemetery of a minimum of 1.5 hectares in size be given to Wivenhoe Town Council that includes off-road parking for 12 cars, and is suitably fenced on all sides and incorporates a suitable footway through it;</i></p> <p>We should perhaps make it clearer that provision of the fencing, the off-road parking and the footway will lie with the developer, and that precise details will be something for discussion between the developer and the CBC Planning Department. Please note that are amending the Policy to include a requirement for a water supply to this new cemetery.</p> <p>After an analysis of the area, we feel this site is the only suitable location for a much-needed new cemetery for Wivenhoe. Being adjacent to Elmstead Road, it will provide good road access and is close to the settlement area and will help to preserve the rural approach to Wivenhoe on the Brightlingsea Road. We note that at this stage, no tests have been conducted to ensure that the water-table is not too high in that area to make a traditional</p>

Submitted by	Comment by Land Owners	Action taken
		<p>cemetery impracticable.</p> <p>14. Paragraph 14</p> <p>Whether all of the clauses included in the various site allocation policies need to be present in Policy or in the supporting paragraphs is debatable since as you point out, some of them would be covered by CBC requirements. We have included them in the Policy wording for clarity about what Wivenhoe residents can expect through agreeing to these additional homes since it is they who will determine whether this Plan gets approved by a referendum in due course.</p>
<p>Nick Davey, JTS Partnership for the University</p>	<p>The JTS Partnership for the University of Essex nick.davey@jtspartnership.co.uk</p> <p>The University of Essex welcomes the fact that the Wivenhoe Neighbourhood Local Plan February 2016 Draft, confirms that, “The University is valued as a very important asset for Wivenhoe and this Plan supports its growth” (para 13.9). The University welcomes Draft Policy WIV16 but cannot, at this stage, support the proposed ‘Action’, which expresses the aspiration to replace the land that is identified for its future expansion, in the Colchester Borough Local Plan, with an alternative allocation to the north of the A133. The University is happy to continue discussions with the Town and Borough Councils but it needs more information about the potential replacement allocation (exact location, size, access, links to the existing Campus / Knowledge Gateway) before it can confirm its position.</p> <p>March 24, 2016 at 4:43 pm</p>	<p>Explanatory letter sent (PH).</p> <p>Action point on University Expansion amended to read: The designation of land for University Academic expansion to the south and west of Boundary Road as shown on the Borough Council’s Proposals map should be removed and the land should revert to green field status, protected by Policy WIV3 and by Colchester’s Coastal Protection Belt Policy and Policy WIV4 provided an equivalent area of land is allocated on the north side of the A133.</p>

2. Comments from Residents

**Wivenhoe Neighbourhood Plan
Consultation Statement**

Submitted by	Comment by Residents	Action taken
Fiona Emms	various on most of Plan content	all considered, no change
Rebecca Bowen	supports Plan content	noted
Peter Dashwood	new surgery location comment	noted, not a planning issue
Nina Morters	asked why no detailed road layout on proposed sites	email response sent: matter for developers
Ann Farncombe	Broadfields development will not leave 'open spaces'	considered, no change
Andy Eastaugh	more emphasis needed on <i>green wedge</i> between Wiv & Uni; more ambition for Quay area	considered, no change
Richard Charnock	artificial surface at Broad Lane sports fields	amendment to relevant text; no change to policy
James Spencer- Gray	open Boundary Rd	noted, not a planning issue
John Thurlow	make clear Quay is a BOAT; not wholly pedestrianised	noted, no change; already in para 11.7-11.10
Peter Kay	ambiguities in Wiv 27-30 re housing numbers	re-write of draft Policies Wiv 27-30
Maggie Brown	various across draft Plan content	all considered, no changes
Pat Marsden	6 pages of various across draft Plan content	all considered; text at 11.9 amended; addition to draft Policy Wiv 12
David Whymark	cemetery too far out of town	considered, no change
Jacky Metcalf	health centre: Philips Rd is the wrong place	considered, no change
Rosalind Scott	housing for elderly, life time standards, should be <i>required</i> not just <i>recommended</i>	considered, no change
Rosalind Scott on behalf of a resident	health centre should be in the Plan	noted
Jeremy Hallum	access to Broadfields proposed development should not be via Richards Avenue	noted

Submitted by	Comment by Residents	Action taken
Chris Barton	provision needed for cyclists along the Quay	recognised this is part of Route 51. Additional text paragraph to be inserted in draft Plan
James Lean	plea for better design requirements to be written into the WNP	Noted. Policy Wiv 26 to get additional paragraph re parking
Peter Cook	unsuitability of Philip Rd for health centre	Noted. Not a planning issue
Cllr Julie Young	independent living units co-located with residential care home; public cycle storage and pumping station. Car charging point	Considered. Potential for living units etc. exists in the WNP (Croquet Gdns) but depends on developers; other points- no change to draft Plan
Craig Revell	update KGV play area; create larger car park	Noted. No change

3. Comments from Statutory Consultees

Submitted by	Part(s) of the Plan concerned	Comments or Concerns	Response by WNP steering group	Changes to the Plan
1. Essex County Council Matthew Jericho	Draft Policy WIV1	The Waste and Mineral Plans are part of the development plan in Essex. Therefore in addition to the need for future development to be in accordance with the Neighbourhood Plan and the Colchester Local Plan, it is necessary to include reference to the Essex and Southend-on-Sea Waste Local Plan and the Essex Mineral Plan. Section 2 will need to be amended accordingly.	Agreed	additional wording inserted into WIV1
2. Essex County Council Matthew Jericho	para 17.17	The Neighbourhood Plan proposes land use designations and development which could be impacted by the mineral/waste operations. ECC requires that these do not prejudice the continued operation of this safeguarded machinery/operations. It is further recommended that paragraph 17.17 is reworded to reflect the fact that impacts are wider than noise alone, as is currently indicated;	Agreed	make change to para 17.17 but delete <i>and proposed to be protected through the Waste Local</i>

**Wivenhoe Neighbourhood Plan
Consultation Statement**

Submitted by	Part(s) of the Plan concerned	Comments or Concerns	Response by WNP steering group	Changes to the Plan
		<p>please see suggested text below.</p> <p><i>'The site is close to Wivenhoe Quarry, which is on its eastern boundary. Although the site is within the Mineral Safeguarding Area, mineral extraction in the western area of Wivenhoe Quarry is complete, with mineral resources worked out or completely restored. Mineral and waste infrastructure on the Quarry site, including the coated road stone facility, is protected through the Minerals Local Plan (2014) and proposed to be protected through the Waste Local Plan (Pre-Submission Draft, March 2016). ECC will need to be satisfied that proposed land uses brought forward through this Neighbourhood Plan, specifically housing development, does not prejudice the continued operation of such infrastructure. Early consultation with ECC on such proposed development is essential, with suggested involvement at the pre-application stage.'</i></p>		<i>Plan (Pre-Submission Draft, March 2016)</i>
3. Essex County Council Matthew Jericho	Draft Policy WIV27	Reflecting the changes suggested to paragraph 17.17, it is recommended that this policy be similarly updated. Please see suggested text below.	Agreed	change draft Policy WIV27 by adding <i>'(iii) the development be protected from impacts arising from Wivenhoe Quarry operations by means of suitable mitigation measures; and'</i>
4. Essex County Council Matthew Jericho	Draft Policy WIV28	Residential development proposed as part of this policy falls within the Minerals Consultation Area relating to Wivenhoe Quarry, as identified in line with Mineral Local Plan Policy S8. However, it is understood that mineral extraction at Wivenhoe Quarry is likely to be complete, with mineral resources worked out or completely restored. ECC must be consulted on the future housing planning application, in line with Policy S8 of the Mineral Local Plan and this should be noted in Policy WIV 28.	Agreed	amend Draft Policy WIV28 accordingly
5. Essex County		ECC is the Lead Local Flood Authority for surface water management. It is recommended that an additional policy focusing	Agreed	New Policy WIV26 to be

Submitted by	Part(s) of the Plan concerned	Comments or Concerns	Response by WNP steering group	Changes to the Plan
Council Matthew Jericho		<p>on the inclusion of above ground sustainable drainage systems is included within the Neighbourhood Plan and appropriate site allocation policies..... As well as loss of habitat, increased development can lead to a change in the natural drainage of a site; if not carefully managed this can lead to increased flood risk both within the area and further downstream. The inclusion of sustainable drainage systems as part of new development can help to minimise the runoff from a new site, as well as improve water quality locally. Furthermore the use of above ground drainage features such as swales, detention ponds, bio-retention areas and wetland areas help to ensure that areas of green and blue space are maintained within the development. The recommended wording for the additional policy is included below.</p> <p><i>“Drainage for new development should be based on the principles of sustainable drainage, as outlined in the Essex County Council SuDS Guide. Wherever possible this should be designed using above ground drainage features to help ensure robust treatment to improve the quality of water entering into local water bodies. The system should also promote wildlife habitats and green and blue corridors running through new development.”</i></p>		included (and policies renumbered)
6. Essex County Council Matthew Jericho		<p>it is recommended that the Neighbourhood Plan should take into consideration Colchester Borough Council's Local Plan's policy on mitigating and adapting to climate change.</p> <p><u>Green Infrastructure</u></p> <p>The Neighbourhood Plan may wish to further consider incorporating green infrastructure as a way of adapting and mitigating against a changing climate and severe weather through the management and enhancement of existing habitats and the creation of new ones to assist with species migration, to provide shade during higher temperatures and for flood mitigation – this can link to 'Local Green Spaces' on page 42 and 'Protecting areas important to wildlife and biodiversity' on page 31.</p> <p>When managing and creating green spaces the Neighbourhood Plan could consider those development proposals that look to implement</p>	<p>The NP's Vision & Objectives statement includes aims to improve green infrastructure.</p> <p>These aims are reflected in the following Policies: Wiv2; 5; 7; 9; and in a couple of Action Points.</p> <p>Further consider the following:</p> <ul style="list-style-type: none"> • Allowing places to store water for reuse to aid water efficiency. 	draft Policy WIV26 amended to incorporate SuDS and permeable surfaces points

Submitted by	Part(s) of the Plan concerned	Comments or Concerns	Response by WNP steering group	Changes to the Plan
		<p>any of the following:</p> <ul style="list-style-type: none"> • The principles of SuDS, with preference given to above ground techniques, which will enhance biodiversity and ecosystems. • Providing a permeable surface for paths and playgrounds to prevent flooding. • Allowing places to store water for reuse to aid water efficiency. • Providing temporary water storage and retention areas (open spaces) to alleviate flooding. • Protecting existing and creating new green infrastructure, and increasing tree cover (including large trees) in streets and open spaces in order to provide shade and cooling to alleviate heat stress. <p>- Managing green infrastructure to increase the amount of carbon stored and reduce greenhouse gas emissions, aiming for net removal of carbon wherever possible, through planting of trees and other plant species and encouraging modal shift from car to walking and cycling. By linking publicly accessible green space wherever possible (including through tree lined streets) to form walking and cycling routes.</p>		
Natural England Phil Sturges and Sarah Fraser	All of the NP	Natural England indicated that they would object to the WNP in pre-submission consultation unless an HRA screening is carried out.	prepare HR screening report	None
Roger Bullworthy agent for Mr Batchelor	Policy Wiv7, list 2 (triangle of land by the Co-op)	This land is not in public ownership and has little value in Townscape terms. Limited well designed development of this site will have greater townscape value. The site should be excluded from List 2 and Policy Wiv7.		None

4 How concerns were considered or addressed

Throughout the period of work leading to the first completed draft of the WNP in 2016, collated and tabulated comments of each public consultation were made available to the working groups and the proposals brought forward by these groups were informed by these comments.

Comments received via website and email until February 2016 can be accessed on-line. All comments received were considered by the Steering Group at its monthly meeting and brought to the attention of the Plan Writing group.

The draft Plan evolved through this period. A 191-page compendious document shows the thinking and reports of the working groups and the process of evolution of the draft Plan. [It is available on the WNP website.](#)

After the launch in February 2016 of the first completed draft, a Plan Review Group met weekly to consider and, where appropriate and possible, to give effect to comments received from residents and other stakeholder and statutory consultees.

The Neighbourhood Plan Steering Group finalised the WNP in **July 2016**, when it was formally handed over to Wivenhoe Town Council in preparation for the pre-submission consultation.

5 Regulation 14 pre-submission and Consultation

The Regulation 14 Pre-Submission Consultation ran for a 6-week period from 26 July 2016 to 6 September 2016.

A coordinated publicity campaign was undertaken which consisted of:

- A notice and link to the plan, placed on the Wivenhoe Town Council and WNP websites.
- Notices in the local press (Evening Gazette and the Brightlingsea & Wivenhoe Chronicle).
- Notification to statutory and non-statutory consultees via email (where possible) or hard copy letter if no email address was available.
- Hard copies of the Plan made available for inspection at the Town Council offices and at the local library.
- Posters/banners on the four Town Council notice boards and at other locations around the town, in shops and in pubs.
- Residents Associations, local clubs and organisations and the three schools were asked to cascade the information electronically to their interest groups.

Distribution to Statutory and Non-Statutory Consultees

In accordance with requirements of the Neighbourhood Planning Regulations, relevant statutory consultees were notified by letter. In addition, a range of parties that the Steering Group considered were likely to have an interest in the Plan were also contacted. All parties were advised to download a copy of the Plan, but were advised where hard copies were available for inspection. The full list of statutory and other consultees that were written to appears below.

Pre-submission Consultation letter

WIVENHOE TOWN COUNCIL

Town Mayor: Cllr. Ian Endean ~ Town Clerk: Antoinette Stinson 77 High Street,
Wivenhoe, Essex CO7 9AB Tel: 01206 822864 ~ Fax: 01206 827298
www.wivenhoe.gov.uk e-mail: wivenhoe_council@btconnect.com

To all consultees

Wivenhoe Neighbourhood Development Plan

26 July 2016

Dear Sir/Madam

WIVENHOE NEIGHBOURHOOD PLAN – PRE-SUBMISSION CONSULTATION

As part of the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2012, Wivenhoe Town Council is undertaking Pre-Submission Consultation on the Wivenhoe Draft Neighbourhood Development Plan (WNP). As a body we are required to consult, we are hereby seeking your views on the Draft WNP. The plan can be viewed and downloaded from the [Wivenhoe Neighbourhood Plan website](#).

A hard copy is available for inspection at Wivenhoe Town Council and Wivenhoe Library. The pre-submission consultation runs for a period of **6 weeks**. The closing date for representations is **6 September 2016 at 17.00**. Representations can either be emailed to wivenhoe.npsg@gmail.com or sent by post to:

Antoinette Stinson, Town Clerk
FAO Neighbourhood Plan Steering Group
77 High Street
Wivenhoe
Colchester
Essex
CO7 9AB

Yours sincerely
Mrs. A. Stinson
Town Clerk

Statutory Consultees - Landowners	
Mr. C. Gooch/agent: Strutt & Parker Andy.Butcher@struttandparker.com	J & S Bowes & Son/agent: Mr. Nicholas. Harper nickharper@hawkspur.co.uk
Mr. I. Woolf ianwoolfie@btinternet.com	Vaughan Blyth WL2010 agent Mr. Ross Bain Ross@vaughan-blyth-homes.co.uk
Mr Dave Whymark & Mr David Jones Jones & Whymark Engineering Ltd Commerce Way, Colchester CO2 8HH jones.whymark@btconnect.com	Alan Everard Head of Estates, Southern Region Tarmac Ltd alan.everard@tarmac.com and Zena Gaskin - Estates Admin: zena.gaskin@tarmac.com
Mr Nick Denny, Property Director Matt Clarke, Boyer Planning Ltd East of England Co-operative Society lwalkden@eastofengland.coop and mattclarke@boyerplanning.co.uk	Network Rail property@networkrail.co.uk
University of Essex Nick Davey, JTS Partnership nick.davey@jtspartnership.co.uk	Wivenhoe Quay Limited Wilkins Kennedy Llp Egham Wilkins Kennedy Llp Reading
Mersea Homes Ltd Brian Morgan, ADP Ltd brian@adpltd.co.uk	Andrew and Charmian Wheatley andrewandcharm@gmail.com
Mr. W. Batchelor agent: Roger Bullworthy 60 Manor Wood Rd Purley Surrey CR8 4LF rogerbullworthy@btconnect.com	Taylor Wimpey UK plc FAO Jennie Daly UK Land Director Gate House Turnpike Rd High Wycombe Buckinghamshire HP12 3NR
Statutory Consultees - Bodies	
Tendring District Council planning.services@tendringdc.gov.uk	Colchester Borough Council Karen.Syrett@colchester.gov.uk
Elmstead Parish Council elmsteadparish@btconnect.com elmsteadparish@gmail.com	Parish Clerk Alresford Parish Council The Pavilion Ford Lane Alresford Essex CO7 8AY
Greenstead councillors cllr.tina.bourne@colchester.gov.uk cllr.tim.young@colchester.gov.uk	Wivenhoe Cross ward councillors cllr.mark.cory@colchester.gov.uk
Wivenhoe Quay ward councillors	Essex County Council (consulted in February)

cllr.cyril.liddy@colchester.gov.uk cllr.rosalind.scott@colchester.gov.uk	Julie Young cllr.julie.young@essex.gov.uk
Environment Agency enquiries@environment-agency.gov.uk	Natural England consultations@naturalengland.org.uk
Marine Management Organisation Lancaster House Hampshire Court Newcastle upon Tyne NE4 7YH info@marinemanagement.org.uk	Highways Agency Network Delivery and Development mark.norman@highways.gsi.gov.uk
British Telecom giles.ellerton@bt.com	UK Power Networks (2 addresses) 237 Southwark Bridge Rd, London SE1, <i>and</i> Fore Hamlet, Ipswich, Suffolk IP3 8AA
National Grid n.grid@amec.com	Essex and Suffolk Water Northumbrian Water Abbey Road Pity Me Durham DH1 5FJ
Anglian Water Services Limited Thorpe Wood House Thorpe Wood Peterborough PE3 6WT planningliaison@anglianwater.co.uk	Affinity Water Tamblin Way, Hatfield, Hertfordshire AL10 9EZ
NHS property services ltd. 85 Gresham Street, London, EC2V 7NQ information@property.nhs.uk	Homes and Communities Agency mail@homesandcommunities.co.uk
Historic England compliance.officer@HistoricEngland.org.uk	Essex Wildlife Trust Abbotts Hall Farm Maldon Road Great Wigborough Colchester Essex CO5 7RZ neilh@essexwt.org.uk
Wivenhoe Community Organisations, with request to cascade to membership	
Nottage Maritime Institute admin@nottagemaritimeinstitute.org.uk	Wivenhoe Housing Trust
Wivenhoe Society rachelinwivenhoe@gmail.com	Wivenhoe Sailing Club clubsecretarywsc@gmail.com

Wivenhoe and District Sporting Facilities Trust simon.wilkinson6@virgin.net	
Queens Road Residents Association queensroadresidents@hotmail.co.uk	Anglesea Road Residents Association 2para-sp-oc@mod.uk
Broadfields Residents Association chrismott49@hotmail.com	West Quay Residents Association aulay@me.com
East St & Brook St RA john@jetent.co.uk	Community Safety & Neighbourhood Watch Cliona@tiscali.co.uk
Wivenhoe Scouts & Guides peter@toadhall2.co.uk	Wivenhoe branch of Women's Institute r.hodge217@btinternet.com
Sustrans cycling network dilly@essex.ac.uk	Wivenhoe Allotment & Garden Assoc mbur29a29@btinternet.com
Wivenhoe Bowling Club albert.twells@btinternet.com	Wivenhoe Congregational church patricia.coventry@hotmail.co.uk
Wivenhoe Tennis Club secretary@wivenhoetennis.org.uk	Wivenhoe Town Cricket Club lmyearling@btinternet.com
Wivenhoe Town Football Club jonathanrensink@yahoo.co.uk	Wivenhoe Methodist Church josephrampling@btinternet.com
St Mary's Church PCC wivstmarysec@gmail.com	St Monica's RC church
Broomgrove Infant and Junior schools office@broomgrove-inf.essex.sch.uk admin@broomgrove-jun.essex.sch.uk	Millfield Primary school admin@millfields.essex.sch.uk
Wivenhoe First, business association jerry@wivenhoefirst.co.uk	Sibbons Keelars Tye House, Keelars Ln, Elmstead CO7 7EP
Wivenhoe GP Surgery 71 The Avenue Wivenhoe CO7 9PP	

5.1 Amendments after pre-submission consultation

Possibly as a consequence of the extensive February 2016 consultation, fewer comments were received after the July 2016 pre-submission consultation. The table of comments and action taken in response to comments is shown below.

Comments received after pre-submission consultations

It should be noted that comments refer to the superseded May 2016 iteration of the Wivenhoe Neighbourhood Plan

Submitted by	Respondents' Comment	Action taken
Connor Adkins, Highways England email 26 July	We have no comments to make as it has little impact on the Strategic Road Network.	none required in consequence of respondent's comments.
Marine Management Organisation email 29 July	Thank you for including the MMO in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.	none required in consequence of respondent's comments.
Helen Taylor helentaylor67@talktalk.net 31 July	<p>1. The footpath from Jack Hatch Way to Boundary road is a direct walking route. If the footpath is diverted around the field many people will still walk the direct route as this will be shorter. If this is a public right of way is the farmer allowed to plough through it? He uses both sides of the path for different crops, so surely he could plough as separate fields. Diversion of the footpath would not be needed. The footpath as it is now has a nice open feel to it as it is on high ground, this will be lost if the path follows the hedgerow.</p> <p>2. Would it be possible to remove the style at this railway crossing on Lower Lodge playing field and replace it with a gate? This would make it much easier for those of us who live in Upper Wivenhoe to access the Wivenhoe trail with bikes and buggies, and for those who are unable to climb over a very high style. Having to cycle or walk to the Station makes the journey too long for some and they therefore miss out on using the Wivenhoe trail.</p> <p>Section 16 Housing.</p> <p>3. Under the proposals for new housing could a "covenant" be put on any bungalows built so that they cannot be converted to two storey homes. We have "lost" so many bungalows in Wivenhoe. This can be seen with a walk</p>	<p>1. comment noted</p> <p>2. comment noted. This is a matter for Network Rail which is consulting on the subject.</p> <p>3. Consideration will be given to removing permitted development rights in order to preserve the long-term housing requirements, particularly with regard to bungalows.</p>

Submitted by	Respondents' Comment	Action taken
	<p>along Heath road, Tower road and The Avenue</p> <p>3a. Could the strip of land between The Avenue and Ernest road be turned into a parking area for the terraced houses on these roads? This would help relieve traffic congestion between this point and the Co Op.</p> <p>3b. It would also help if a bus stop lay-by could be made at the junction with Rosabelle Avenue.</p>	<p>3a. this strip has been allocated as Open Space in the WNP</p> <p>3b. This is a Highways matter.</p>
<p>Elmstead Parish Council elmsteadparish@gmail.com 2 August 2016</p>	<p>Our PC has discussed the relevant part of the Wivenhoe NP but wished to make the following comment in advance of the consultation:</p> <p>Dene Park (the area opposite Millfields School) is in the ownership of Elmstead Parish Council and since Wivenhoe Town Council do not control this land we feel it would be wholly inappropriate to include reference to its use in the Neighbourhood Plan.</p> <p>[Reply to respondent: Thank you for your response. The statutory pre-submission consultation will run until 5pm on 6 September. Could you please confirm that in case no further observations on the neighbourhood plan are received from Elmstead Parish Council you would be content for your response to be taken as the PC's comment for purposes of this current consultation? Many thanks.]</p> <p>No further comments received.</p>	<p>This area falls within the WNP area which was subject to consultation at the time it was designated and therefore properly subject to any use allocation made in the WNP.</p> <p>Conserving this area as Open Space was strongly supported during public consultations on the Plan.</p> <p>No action required.</p>
<p>Ian Valentine ianrval@btinternet.com 4 August 2016</p>	<p>Comment: 1. I haven't noticed any plan for a new road to serve the Cooks Yard development. Only being able to use East and Brook Streets for access is ridiculous.</p> <p>2. I'd like to have seen some policy for encouraging more independent shops to set up in Wivenhoe.</p> <p>3. Re paragraph 5.12 shouldn't the first line say "Falling within the Coastal Protection Belt" rather than "Falling with....."?</p>	<p>1. It is not feasible that the WNP could deliver a new road.</p> <p>2. This is covered by Wiv Policy 19</p> <p>3. Typo noted</p>
<p>Anglian Water Sue Bull, Planning Liaison Manager sBull@anglianwater.co.uk</p>	<p>Thank you for the opportunity to comment on this stage of the plan. We support Objective 8: <i>Ensure Wivenhoe's infrastructure is adequate to meet the need of its residents</i>. This includes drainage infrastructure and it is recommended that</p>	<p>none required in consequence of respondent's comments.</p>

Submitted by	Respondents' Comment	Action taken
5 August 2016	<p>this is clarified in the objective and policy.</p> <p>It is noted growth of 250 dwellings in Wivenhoe is included in the Neighbourhood Plan in line with the proposal in Colchester Local Plan (Policy SS18) that is currently under review. There is sufficient treatment capacity at Colchester Water Recycling Centre to accommodate the additional flows from the proposed growth. Network improvements are likely to be needed.</p>	
<p>Boyer/East of England Coop BethanRoscoe@ boyerplanning.co.uk 8 August 2016</p>	<p>It is noticed that the Policy, specifically relating to the Cedric's Garage site, has altered slightly from previous stages of Consultation and now includes the following in respect of wording:</p> <p>Pre-submission Consultation: Policy WIV21: Cedric's Site</p> <p>"Whilst it is recognised that this site currently has permission for residential development, proposals for a mixed use scheme that is sympathetic to the surrounding area would also be supported."</p> <p>Whilst it is welcomed that reference is made to the extant planning permission on the site for residential development, supporting text (at paragraph 15.12) provides greater emphasis on the support given to a mixed use scheme, as set out below:</p> <p><i>"A carefully and sensitively designed scheme could provide Wivenhoe with a mixture of business and residential accommodation at what could be a new "heart" for Wivenhoe and a place for people to live, work and shop.</i></p> <p><i>This site could also accommodate three-storey flats with businesses on the ground floor and dwellings above. There are already flats about the Co-op store and in the former three-storey Park Hotel at the adjacent road junction, as well as three-storey town houses close by in De Vere Close."</i></p> <p>The heavy focus on mixed use development on this is of considerable concern, not least in triggering uncertainty as to how alternative, solely residential, proposals that would both reflect the site's existing consented use and accord with the Government's thrust for achievement of</p>	<p>The WNP was changed in response to previous, similar representations; the WNP policy as it stands does not preclude residential development and no further changes are considered necessary.</p>

Submitted by	Respondents' Comment	Action taken
	<p>sustainable development would be viewed.</p> <p>As set out in previous representations, the East of England Co-operative Society, as owners of the site, have particular concerns that mixed use development (by definition including commercial elements) would not be economically viable. This has regard to the particular circumstances of the site, including high costs involved in site clearance and remediation.</p> <p>It is therefore requested that a more flexible approach to development of the site is included in the Plan, giving equal weight of support for either residential or mixed use developments.</p> <p>In this regard, we propose, and would be grateful if you would be able to give consideration to the following wording:</p> <p>“Policy WIV21: Cedric’s Site</p> <p>This site currently benefits from extant permission for housing development. As such proposals for either alternative residential or mixed use schemes sympathetic to the surrounding area would also be supported.”</p> <p>It is in our view that the above suggested wording better reflects support for residential development, whilst not ruling out the opportunity for a mixed-use scheme on this site, should this be determined to be a viable option.</p>	
<p>National Grid Amec Foster Wheeler n.grid@amecfw.com 17 August</p>	<p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distribution’s Intermediate / High Pressure apparatus.</p> <p>National Grid has identified the following high pressure Gas Distribution pipelines as falling within the Neighbourhood area boundary:</p> <p>1833 Salary Brook - Bockings Elm – HP Pipeline</p> <p>1842 Ardleigh - Colchester Pipeline – HP Pipeline</p> <p>From the consultation information provided, the above gas distribution pipelines do not interact with any of the proposed development sites.</p> <p><i>Gas Distribution – Low / Medium Pressure</i></p>	<p>none required in consequence of respondent's comments.</p>

Submitted by	Respondents' Comment	Action taken
	<p>Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact plantprotection@nationalgrid.com</p>	
<p>University of Essex JTS Partnership LLP September 5, 2016 at 2:20 pm nick.davey@jtspartnership.co.uk</p>	<p>The University of Essex notes the provisions of the Draft Plan, dated May 2016, and welcomes the fact that the Draft Plan acknowledges the important role that the University plays in the economic, social and cultural life of the parish and town.</p> <p>The University offers its qualified support to the identification of land to the north of the A133 (Policy WIV2) for development subject to proper coordination with, and reciprocal allocations, in the emerging Colchester and Tendring Local Plans. The University also agrees that, if development in this area takes place, it is important that it is accompanied by appropriate improvements in the local road infrastructure, including a new link from the A120 to the A133.</p> <p>The University, however, wishes to submit a holding objection to the proposal to de-allocate the area of land to the south west of the existing Campus, which is allocated in the current Colchester Borough Local Plan, for University expansion. The University is happy to discuss this proposal, but cannot offer its support until an appropriate replacement allocation is agreed between Wivenhoe Town, Colchester Borough and/or Tendring District Councils. The University particularly notes that the Draft Wivenhoe Local Plan suggests a replacement allocation to the north of the A133, whereas the draft Colchester Borough Plan promotes an allocation to the east of the B1028, which primarily lies within Tendring District. Tendring's draft Local Plan is, however, silent on the matter.</p> <p>Following on from the above concerns, the University also wishes to put on record a holding objection in respect of Policy WIV3, in that it should not extend to, or place any restriction upon the development of, the land identified for University expansion in the current Colchester Borough Local Plan. Similarly, the land identified for University expansion in the current Colchester Borough Local Plan should not be subject to the controls set out in Policies WIV4 and WIV5.</p> <p>Policy WIV16, concerning the University of Essex, and subject to the</p>	<p>The Steering Group believes that these comments do not at present require a change to the draft NP.</p> <p>Policy Wiv 5 relates to the University Marshes which is an area not currently allocated for University expansion, and the policy is to remain unaffected by the comments.</p>

Submitted by	Respondents' Comment	Action taken
	caveats set out above, is generally welcomed and supported.	
<p>Mr Charles Gooch Strutt & Parker Andy.Butcher@struttandparker.com September 6, 2016 at 16:43</p>	<p>6. Policy SD1 of the Strategy sets the strategic housing requirements for the Borough and expresses the overall figure as “at least, 19,000 homes between 2001 and 2023”.</p> <p>The introduction of a cap on housing requirements would not accord with either with this strategic policy or the presumption in favour of sustainable development contained in the NPPF. The Preferred Options Local Plan to replace the 2014 Local Plan is currently on consultation. It again expresses the housing requirement for the period 2013 to 2033 as a minimum (18,400 homes). This is followed through at Table SG2 of the Plan where a 250 homes figure for Wivenhoe is expressed as a minimum.</p> <p>7. As previously suggested in our previous representation, we acknowledge that the WNP indicates that a maximum figure is necessary because of issues with the local primary school and constraints on suitable sites. However, this approach is questionable given the NPPF requirement to plan positively for development. We pointed out previously that the Independent Examiner on the Woodcote, South Oxfordshire Neighbourhood Plan found that <i>“the imposition of a maximum figure for housing creates a significant and fundamental conflict with the NPPF”</i>, considering this to be an inflexible and inappropriate approach to sustainable development. The Examiner’s recommendations were that the number of houses should be represented as a “minimum” or “at least”.</p> <p>15. As indicated above, we have some concerns that the policies as drafted are more prescriptive than is necessary and there would almost certainly be other approaches which would be consistent with sustainable development. Certainly, it is best practice that the wording of policies in</p>	<p>The figure 250 refers to the aggregate on the four specified sites and is not a cap on new development given that there will be some windfall development as explained in paragraphs 16.13 and 16.20 of the WNP</p> <p>The respondent's demand for flexibility beyond that already included in</p>

Submitted by	Respondents' Comment	Action taken
	<p>Neighbourhood Plans should be reasonably flexible to meet the basic conditions. Our detailed suggestions in relation to policies WIV30 and 31 are as follows:</p> <p>WIV30 - Land at Elmstead Road site:</p> <p>16. The land shown in Figure 36 totalling 0.93 hectares is allocated for 25 dwellings development will be expected to accord with the following criteria:</p> <p>(i) The dwellings should preferably be a maximum of two bedroom suitable for single people or as starter homes for young couples; and</p> <p>(ii) 20% of these dwellings should be affordable housing, subject to viability; and</p> <p>(iii) subject to suitability of ground conditions and viability, cemetery land of a minimum of 1.5 hectares in size shall be provided to Wivenhoe Town Council with car parking for 12 cars, suitably fenced on all sides and incorporating a suitable footway through it, with a cold water supply to a stand pipe ; and</p> <p>(iv), (v), (vi) and (vii) No comment as these are matters that would be a normal requirement for any planning application.</p> <p>(viii) This is a matter that should be dealt with through the Council's CIL and so should be deleted.</p> <p>WIV31 – Land behind the Fire Station</p> <p>17. The land shown in Figure 39 totalling 3.06 hectares of which 2.7 hectares is allocated for 80 dwellings. Development will be expected to accord with the following criteria:</p> <p>(i), (ii), (iii), (iv), (v) and (vi) The mix expressed in the policy as drafted should be expressed as a guideline rather than part of a policy for the site. This could include reference to some self-build plots</p> <p>(vii) Agreed.</p> <p>(viii) Agreed subject to viability, which should be stated.</p> <p>(ix) This is a matter that should be dealt with through the Council's CIL.</p> <p>(x) and (xi) These are matters that would be a normal requirement of a planning application.</p>	<p>the Plan's policies would be contrary to the evidence of housing needs as analysed and explained in Chapter 16 of the WNP</p> <p>A review of the WNP will be undertaken against the background of all comments received.</p>

Submitted by	Respondents' Comment	Action taken
	<p>18. As indicated above, we would suggest that several of the site specific criteria set out in the policies that have to be satisfied contained within the wording of the policies or the allocations would or will be normal requirements of Borough Council planning policy (e.g. highways, pedestrian and vehicular accessibility wildlife surveys, landscaping, lifetime homes) and it is questionable whether such matters ought to be in the policies or perhaps referred to in the supporting text.</p>	
<p>Natural England kayleigh.cheese@naturalengland.org.uk September 6, 2016 at 15:00</p>	<p>Natural England has previously made recent comments on the Neighbourhood Plan to Jane Black, the most recent emails dated 12/07/2016 and 26/07/2016 regarding Wivenhoe NP Habitats Regulations Assessment (HRA) screening assessment. Our advice to the neighbourhood plan remains the same at this stage, in summary we advised the following:</p> <ol style="list-style-type: none"> 1. There are unlikely to be any likely significant effects alone as a result of the Wivenhoe Neighbourhood Plan, but it is not possible to rule out likely significant effects of the Neighbourhood Plan in combination with other development proposals in the locality. 2. It will be necessary for the relevant Local Plans to identify any mitigation measures but the Neighbourhood Plan cannot rely on these mitigation measures if it is produced ahead of the Local Plan. The Habitats Regulations require certainty that the required mitigation can be delivered and relying on mitigation measures in the Local Plan, which has not yet been submitted or adopted, would not meet the requirements of certainty. The Neighbourhood Plan will therefore need to be able to deliver any mitigation measures to address in-combination effects if it progresses ahead of the Local Plan. 3. Once the Colchester Local Plan is in the public domain (which it is now) the HRA for the neighbourhood plan will need to consider the in-combination effects of the Local Plan with the Neighbourhood Plan, when the Neighbourhood Plan is progressing ahead of the Local Plan. Whilst we acknowledge the plan is proposing 250 dwellings which is in line 	<p>Comments noted.</p> <p>Discussions have been had and agreed with CBC that the in-combination effect cannot be evaluated by WNP at the current stage and will in due course be part of CBC's own HR Assessment work including any necessary mitigation measures.</p> <p>It was felt unreasonable to delay the WNP for the reasons suggested by Natural England as the new Local Plan is still in its consultation stage. The data forming the basis of the Plan were gathered in November 2013; data have built-in obsolescence; therefore progressing the NP as soon as possible is considered desirable. Once made, the NP will be periodically reviewed.</p>

Submitted by	Respondents' Comment	Action taken
	<p>with the Colchester preferred options Local plan, currently the HRA screening report undertaken for the neighbourhood plan has not taken into account of in-combination effects. The Colchester Local Plan proposes a number of housing allocations including Wivenhoe and new garden communities, including one at East Colchester/West Tendring. As yet the Colchester Local Plan HRA has not been subject to consultation. As previously advised, in our view there isn't sufficient detail / evidence provided to rule out in-combination effects of the Garden community. A much more detailed in-combination assessment would be required to enable a conclusion of no likely significant effect to be reached. This is an exercise which the HRA of the Colchester Plan will need to undertake. We are also therefore not convinced that the mitigation measures proposed in the Neighbourhood Plan would be sufficient to reduce the in-combination effects to enable a conclusion of no likely significant effects to be reached. We advised the neighbourhood plan submission should be deferred until the local plan has undertaken a full HRA, so that you can meet the requirements of the Habitats Regulations and the Neighbourhood Planning Regulations.</p>	<p>An additional Mitigation Policy was introduced into the final Neighbourhood Plan iteration.</p>
<p>Tendring District Council wfuller@tendringdc.gov.uk 7 September 2016</p>	<p>Thank you for consulting Tendring District Council with regard to the emerging Wivenhoe Neighbourhood Plan Regulation 14 consultation. The Council's formal consultation response is at Officer level and set out below.</p> <p>The Wivenhoe Neighbourhood Plan is referred to in this consultation response as the 'Wivenhoe Plan' and the Tendring District Local Plan Preferred Options Consultation Document is referred to as the 'Preferred Options Document' within this response.</p> <p>The Wivenhoe Plan has a plan period which runs until 2032. The District Council's Preferred Options Document has a plan</p>	<p>none required in consequence of respondent's comments.</p>

Submitted by	Respondents' Comment	Action taken
	<p>period which extends to 2033. It is considered that these two plan periods run broadly in-line and that there are benefits to this as an approach. Tendring DC welcomes the development of Neighbourhood Plans and particularly welcomes the approach made on the broad area of search for the east of Colchester garden community. WIV 1 and WIV2 seem to be reasonable aspirations and we look forward to working further with your Neighbourhood Plan team as both are plans follow their preparation processes.</p> <p>A couple of observations: Within the first section of the Wivenhoe Plan it states that proposed development must accord with all 31 policies contained within the plan. It is considered that further consideration should be given to this as an approach. It may be that some policies will not be relevant to all developments which could come forward in Wivenhoe. Perhaps the phrase 'where relevant' could be inserted in this section to give flexibility to development in this area. It is observed that a number of the proposed policies are brief in nature, lacking detail or guidance. Perhaps further consideration should be given to these policies in order to add clarity and detail for potential users of the Wivenhoe Plan.</p>	

Some further amendments were made following receipt of an NPIERS Health Check report in late June 2017.

The [Final version of the Wivenhoe Neighbourhood Plan](#) was submitted for compliance review by the Local Planning Authority on 24 November 2017.