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# Local Plan Colchester Borough 2017 – 2032

## Preferred Options Consultation July 2016

### Representations

on behalf of

R F West Ltd

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Stanway

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- 2.0 Representations to the Issues and Options Plan, January 2015 and subsequently Appraisal Report; December 2014 on behalf of RF West Ltd in respect of land at Stanway February 2015.
- 3.0 Proposals Map – West Colchester. Extract from plan taken to Local Plan Committee, CBC on 5<sup>th</sup> July 2016.



## 1.0 EXECUTIVE SUMMARY

- 1.1 Andrew Martin-Planning is instructed to make representations to the emerging Local Plan for Colchester on behalf of R F West Ltd, in respect of land at Stanway. Previous representations submitted to Colchester Borough Council in respect of this site are attached at Appendix 1. These include a site location plan.
- 1.2 The site comprises some 46 hectares of land to the west of Stanway, which forms a district suburb of Colchester. It is bordered by the A12 dual carriageway to the north, Wyvern Farm site (the subject of residential development, under construction by Persimmon Homes Essex and Bellway Homes) to the east, the B1408 London Road and properties fronting onto it to the south, and the unclassified Turkey Cock Lane and properties fronting onto it to the west.
- 1.3 The predominant existing use is agriculture but there are also a number of existing structures within the site including a garden centre, a public house/carvery, restaurants, a children's nursery and the first Strokes swimming pool.
- 1.4 This land was promoted via the call for sites process. The proposals include up to 630 dwellings, employment, a primary school and substantial public open space and structural planting. Further representations were submitted to CBC in respect of this land in response to the Issues and Options Plan and SAR in February 2015 (see appendix 2).
- 1.5 The adopted development plan for Colchester identified Stanway as a Growth Area to deliver some 1800 dwellings (including 800 on greenfield land) plus employment. This Growth Area has now largely been built or is under construction. Part of this site, now being promoted at Stanway, lies within the designated Growth Area. The remainder represents a logical extension that is required to meet a significantly increased housing target for the Borough.
- 1.6 The site is highly sustainable in the context of the National Planning Policy Framework (NPPF). It has excellent access to a range of services and facilities via different modes of transport and is within easy walking distance to most of these. It also lies adjacent to existing bus stops.
- 1.7 The emerging draft Local Plan Preferred Options was taken to the Local Plan Committee on 5 July 2016 with a recommendation that it be approved for public consultation. This confirmed Colchester's Spatial Strategy for growth (Policy SG1) that provides for a settlement hierarchy ranking areas of the Borough in order of their sustainability merits and the size, function and services provided in each area. This spatial hierarchy focuses growth on the urban area of Colchester, with the Town Centre at its heart, reflecting its position as the main location for jobs, housing, services, and transport. The town centre sits above other parts of urban Colchester, which includes Stanway. Thereafter the next tier of preferred growth includes new Garden Communities to the east and west of the Borough and below that proportionate growth in 3 District Centres and 15 large villages.



- 1.8 The site subject of these representations was included as an allocation in the draft plan presented to members on 5 July and highlighted on the West Colchester Proposals Map (see extract at Appendix 3), as a proposed site for housing. Paragraph 6.75 of the draft plan clarified the following:

***“Land between London Road and A12 Stanway***

*6.75 The site is situated to the west of the Colchester and runs south of the A12 and north of London Road. It is in a sustainable location, well placed for public transport connections and job opportunities at the nearby economic area. Planning permission was granted for 358 units in 2015 on land to the east at Wyvern Farm. This allocation extends development further west and will provide for approximately 500 additional dwellings together with open space and community facilities as required including primary school provision. Development of the site will need to have regard to specific site constraints including archaeology, mineral safeguarding and drainage and water treatment 119 management. It will also be important to retain a significant break between the site and Turkey Cock Lane/Copford.”*

- 1.9 On the night of the Committee meeting a schedule of changes was referred to. These were described as “corrections/omissions identified since the publication of the Local Plan for the Committee Agenda” and “further minor amendments which relate to grammatical corrections and cross referencing.” Significant change was however made in relation to table **SG2 Housing Provision**. The table continued to make an allowance for 678 dwellings at Stanway, but subject to a note confirming that the site for 500 dwellings to the west of Stanway would not be determined until the boundaries of the West Colchester Garden Community has been defined. Associated text at paragraph 6.75 was deleted, as was reference to the site allocation (Policy WC2) on the West Colchester Proposals Map. Similar changes were made in respect of land to accommodate 930 dwellings to the east of Colchester, adjoining the proposed new settlement area of search. Additional text was proposed to paragraph 4.29 of the plan to explain/justify these changes. This reads:

*“The housing provision table SG2 makes an allowance for an additional 930 dwellings to be located to the east of Colchester, and 500 to the west of Stanway, the sites for which will be determined once the boundaries for the Garden Communities to the east and west of Colchester have been defined. This will allow for opportunities to deliver appropriate linkages between the new Garden Communities and the existing urban areas to the east and west of Colchester and ensure that sufficient green buffers are maintained between the new and existing communities.”*



- 1.10 These representations submit that the above changes are not minor adjustments to the consultation plan. Furthermore it is not accepted that there are similarities between land at Stanway (500 dwellings) and North Colchester (930 dwellings) that would justify the same treatment in the context of the Local Plan and the need to determine these sites following identification of the new Garden Community boundaries. Land to the north of Colchester adjoins the area of search for the East Colchester Garden Community whilst to the west of Stanway is separated from the West Colchester Garden Community by up to 1.5 miles. Policy has already been established to ensure significant green buffers between new and existing communities on the edge of Stanway and Copford Village.
- 1.11 All aspects of a local plan must be realistic and deliverable but the NPPF makes specific requirements in relation to planned housing land supply. Paragraph 47 bullet points 2 and 3 and footnotes 11 and 12 confirm this point. These require authorities in their local plans to identify and update annually a supply of specific, deliverable sites sufficient to provide 5 years worth of housing against their housing requirements, with an additional 5% (moved forward from later in the plan period), or 20% where there has been a record of persistent under delivery of housing. Thereafter plans should identify a supply of specific developable sites or broad locations for growth for years 6 – 10 and wherever possible years 11 – 15.
- 1.12 The housing chapter of the consultation plan, as supported by the Sustainability Appraisal, leaves no doubt that to provide 678 dwellings at Stanway (as confirmed in Policy SG2: Colchester’s Housing Provision) will require the development of the land at London Road, subject of these representations. This is further clarified in paragraph 4.29 that refers to 500 dwellings to the “west of Stanway”. In the context of the NPPF it makes no proper sense in planning terms, not to identify the site on the accompanying Proposals Map. This is also contrary to the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.13 The failure properly to identify this land is also contrary to the background evidence to the Plan in the form of the Sustainability Appraisal. This states in Paragraph 1.1.3 that the Colchester Borough Council Local Plan Part 2 provides the specific policies and allocations for Colchester Borough. This part of the Local Plan is said to include allocations and policies organised by area, so that residents will be able to easily find planning information specific to their local community. This place-based approach is said to align with the latest best practice put forward by the Local Plans Experts Group in their March 2016 Report to Government, Discussion Paper No. 5, which states:

“The policies and site allocations within the Plan should, where possible, be place-structured, enabling a user to quickly identify what the Plan proposes for their geographical area of interest, and should also include a succinct vision and strategy for the main places.”



- 1.14 The draft Local Plan at paragraph 1.23 states that it will set out the overarching spatial vision for development of Colchester to 2033, *including broad allocations for strategic growth as well as other detailed allocations*. Part one of the Plan does not appear to meet the Town and Country Planning (Local Planning) (England) Regulations 2012. This matter will be advanced in separate representations to the local plan on behalf of R F West Limited, in relation to proposals for land at Marks Tey. Part two as drafted does set out a number of land use allocations that are site specific and these are shown on the Proposals Maps. Indeed the Council's website clarifies the purpose of Proposals Maps to support policies found in the Local Plan as follows:

“The Proposals Maps are to be read together with the documents that make up Colchester Borough Council's Local Plan. Allocations are shown on the Proposals Maps and these reflect policies within the Development Plan Documents (DPD) that the Council has produced to date. The maps cover the entire Borough and will be a key tool in the determination of planning applications and growth of the Borough over the plan period.”

- 1.15 It is submitted that proposals in the emerging plan for 500 dwellings west of Stanway should be identified on the Proposals Map, in order to meet the requirements of Part 3 (5) and Part 4 (3) of the 2012 Regulations as referred to above. These require site allocation policies and allocations of sites to be shown on an OS map that illustrates geographically the application of the policies in the plan, sufficient to guide the determination of planning applications.
- 1.16 Until the recent amendments to the emerging Plan, land to the west of Stanway had been viewed by the Council as unconstrained land that is available to meet the demand for new homes in the Borough. In preparing the Plan it was recognised that “the Borough has a limited and diminishing supply of brownfield sites that can contribute to accommodating new growth. Accordingly, development sites for the 2017-33 period include new greenfield sites which have been selected on the basis of their sustainable location and deliverability.” (extract from Policy SG2).
- 1.17 Paragraph 4.27 refers to a Housing Trajectory. No trajectory is appended to the plan. The most up to date trajectory appears to be that set out in the Authority Monitoring Report 2015. This only deals with existing commitments. It is at odds with paragraph 47 of the NPPF that requires a housing trajectory for the plan period that demonstrates the housing implementation strategy and how the delivery of a five year housing land supply will be maintained to meet the housing the housing target.



1.18 Furthermore, Planning Policy Guidance accompanying the NPPF confirms in Paragraph: 002 Reference ID: 12-002-20140306 what a Local Plan should contain. It states:

“The Local Plan should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered. This can be done by setting out broad locations and specific allocations of land for different purposes; through designations showing areas where particular opportunities or considerations apply (such as protected habitats); and through criteria-based policies to be taken into account when considering development. A policies map must illustrate geographically the application of policies in a development plan. The policies map may be supported by such other information as the Local Planning Authority sees fit to best explain the spatial application of development plan policies.” (our underlining).

1.19 National Planning Policy sets clear expectations as to how a Local Plan must be developed in order to be justified, effective, consistent with national policy and positively prepared to deliver sustainable development that meets local needs and national priorities. To accord with this guidance it is submitted that paragraph 6.75 of the draft Plan taken to Committee on 5 July, should be reinstated, together with identification of the land to the west of Stanway on the Proposals Map as a housing allocation. (see Appendix 3).



## 2.0 RESPONSE TO THE POLICIES OF THE PLAN

### PART ONE

#### **SP1: Presumption in Favour of Sustainable Development**

- 2.1 Support is extended for this policy that accords with the NPPF and its guidance to local authorities to promote sustainable development that would improve economic, social and environmental conditions in an area.
- 2.2 Land to the west of Stanway conforms with Policy SP1 and the spatial strategy for growth promoted in the plan. The distribution of new housing is to be guided by the settlement hierarchy set out in the spatial strategy (Policy SG1). This focuses development on Colchester Urban Area (including Central, North, East and West Colchester) followed by new Garden Communities to the east and west of the Borough.

#### **SP2: Meeting Housing Needs**

- 2.3 Support is extended for policy SP2 that identifies a housing need for at least 18,400 net additional homes in the plan period in Colchester Borough (i.e. 920 dwellings per annum). This is consistent with Colchester Borough Council's evidence base and the findings set out in the Objectively Assessed Housing Needs Study by Peter Brett Associates, July 2015 and as updated in a report by HDH Planning and Development, December 2015.

#### **SP3: Providing for Employment**

- 2.4 Support is extended for Policy SP3 that proposes 139.1 hectares of employment land in North Essex including 55.8 in Colchester Borough. This is to be focused on locations that reduce the need to travel and therefore promote sustainable growth. As such employment development will be a key component of the new Garden Communities and strategic growth locations.
- 2.5 Proposals for land to the west of Stanway include some 3 hectares of employment land. This is proposed to be relocated from an existing allocation to the west of Stane Park and south of the A12, which does not relate well to an existing wider employment area. Instead this employment use should be moved to a more effective location, to the north of existing employment and community uses on the site, and accessed via an existing service road from London Road through the Wyevale Garden Centre and beyond.
- 2.6 The provision of employment uses on this site accords with Policy SP3 and should be confirmed as an 'allocation' and shown on the relevant proposals map.



#### **SP4: Infrastructure**

- 2.7 This policy requires new development to be supported by the provision of infrastructure services and facilities to serve its needs. The policy recognises the importance of focusing growth in sustainable locations in the urban areas to take advantage of existing provision. Land to the west of Stanway has good access to a range of services and facilities via different modes of transport and is within walking distance of many. It lies adjacent to existing bus stops and will justify an extension/enhancement to established routes. A proposed mixed use scheme would complement the existing mix of residential, commercial and employment uses and provide a primary school for new and existing residents.

#### **SP5 Place Shaping Principles**

- 2.8 Support is extended for major new developments to meet high standards of built and urban design, and the use of development frameworks, masterplans and design codes to achieve the listed objectives.

#### **SP6 Spatial Strategy for North Essex**

- 2.9 This policy confirms:

“Existing settlements will be the principle focus for additional growth across North Essex. Development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area.”

Support is extended for this strategy as it relates to Colchester Borough. Growth is proposed to focus initially on Colchester urban area where 4000 units are expected to be delivered over the plan period. However because of the limited and diminishing supply of available brownfield sites, new communities are included in the spatial hierarchy as a sustainable option for further growth of homes and jobs. Land west of Stanway, the subject of these representations, is therefore a key site that the plan envisages will come forward as part of the first tier of development sites. There is no up to date housing trajectory to support this draft plan and it is unclear therefore when the Council envisage precisely the delivery of housing on this site. Such a trajectory is required in accordance with paragraph 47 of the NPPF, to demonstrate the housing implementation strategy and how the delivery of a five-year supply of housing will be maintained to meet the housing target.



### **SP7 Development and delivery of new garden communities in North Essex.**

- 2.10 Due to the limited and diminishing supply of sites in the urban area this policy proposes three new communities in the spatial hierarchy as the next sustainable option for further growth of homes and jobs in the longer term. We contend that these proposed schemes should feature on the Housing Trajectory to support the Plan. At the current time these are only proposed as ‘broad locations’ of search and not ‘allocations’. Further consideration needs to be given to the delivery vehicle proposed to bring forward these sites and how undue delay can be prevented. There is no certainty that the delivery vehicle will be established. Furthermore, for the Plan to be flexible proposals should be achievable and deliverable through changes in circumstances. To ensure timely delivery the new garden communities should be allocated, at least in part, so that early phases of growth, in the plan period, can be brought forward with a degree of certainty. This should be through flexible options for delivery, not just depending on a special delivery vehicle.
- 2.11 When the plan was taken to committee on 5 July 2016 an accompanying report stated at paragraph 4.7 that “Part one of the Local Plan provides *allocations* and policies to be included in each of the three Local Plans prepared by Braintree, Colchester and Tendring Councils.” Paragraph 1.23 of the Draft Plan also confirms: “Joint Local Plans with Tendring and Braintree District Councils as appropriate will *allocate* land to specific uses within Garden Communities. However Part one of the Plan does not make any allocations. A key diagram at Appendix 2 shows a very broad location for the two new communities. This is a simplistic diagram which does not indicate specific allocations or even designated or indicative ‘broad areas of search”. Nor is the diagram on an OS base. The draft Local Plan has therefore yet to show any allocations for the new communities that would meet the requirements of Part 3 (5) and Part4 (9) of the Town and Country Planning (Local Planning) (England) Regulations 201. These require Local Plans to illustrate graphically on an Ordnance Survey map, the application of policies in the plan, sufficient to guide the determination of planning applications.

### **SP9: West of Colchester / East Braintree New Garden Community**

- 2.12 Support is extended for a new garden community of up to 20,000 homes in Colchester and Braintree. A masterplan framework is proposed to set out the nature, form and boundary of the new community. This is to contain a phasing and implementation strategy. As clarified above, in order to conform with the NPPF, the Proposals map accompanying the plan should at the very least identify a broad area of search for this new community. At the present time the only identification of this proposal and the Garden Community to the east of Colchester, is in the form of a symbol on a key diagram, which does not have an OS base. This is contrary to national planning policy guidance for the formation of Local Plans.



## **PART TWO**

### **SG1: Spatial Hierarchy**

2.13 Support is extended for policy SG1 that in line with Part One of the plan seeks to locate growth in the most accessible and sustainable locations in the Borough. That hierarchy commences with a focus on the urban area of Colchester followed by new Garden Communities to the west and east of the Borough. These new communities are planned to grow over time, extending beyond the plan period.

### **SG2: Housing Delivery**

2.14 New allocations in the plan period are identified in this policy. Land at Marks Tey (west of Colchester) is expected to deliver 1350 new homes in the plan period, within Colchester Borough. In addition land at Stanway is expected to deliver 678 new homes. Late amendment to the plan removed the site specific allocation on land at London Road, to the west of Stanway, stating instead that this will be determined once the boundaries of the Garden Community has been defined.

2.15 We submit that failure to identify this allocation, on land that is anticipated to come forward early in the plan period by virtue of its ranking within the hierarchy of areas for growth, is contrary to national planning policy. The reason given for the failure to allocate the land for growth at Stanway is that this will allow for the opportunity to deliver appropriate linkages between the new Garden Community and the existing urban area to the west of Colchester, and ensure that sufficient green buffer are maintained between the new and existing communities. Other policies of the plan confirm the need for such buffers and linkages and it is submitted that definition of the development sites would allow for these to be planned properly.

2.16 There is no justification to link the representation site with the yet unknown boundaries of the new Garden Community in the vicinity of Marks Tey, some 1.5 miles away, with Copford sandwiched between them. This land west of Stanway should be focused on the District Centre at Tollgate, with its substantial commercial, employment, retail and community facilities. The subject site falls within the first tier of the spatial hierarchy for growth set out in SG1 and SG2, and relates to Colchester urban area. Development of this land would boost the viability of the existing facilities in the urban area and proposed linkages should first and foremost relate to the District Centre and not as yet unknown future aspirations for a new Garden Settlement.



### **SG3: Economic Growth Provision and Centre Hierarchy**

- 2.17 This encourages economic development and focuses on Strategic Economic Areas (SEAs), that are considered to be the best employment sites in the Borough. Land at Stanway is identified as *“a favoured location for strategic economic opportunities given its relative sustainability taking advantage of good access to the A12”* (paragraph 4.37). To allow for flexibility the SEAs are divided into sub areas (zones). The Council propose to work with other key stakeholders to ensure a comprehensive approach to the delivery of employment land and other mixed commercial uses within the SEAs in accordance with policy WC1: Stanway Strategic Economic Area.
- 2.18 Some of the land that lies on the edge of the Stanway SEA forms part of the land proposed for employment development and the subject of these representations. It is submitted that this has remained vacant for a number of years and is poorly related to the wider economic zone, due to its shape and access via the new housing development. This land lies to the east of the representation site and north of land under construction for residential development by Persimmon Homes Essex and Bellway Homes. The proposals for land to the west of Stanway propose the relocation of this employment allocation to adjoin existing employment uses including a garden centre, public house, restaurants, retail uses, childrens’ nursery and the first Strokes swimming pool, currently accessed from London Road. This would be consistent with the proposed mixed use scheme.
- 2.19 Amendment of the Proposals Map to define the mixed use allocation including 500 new homes, would ensure the proper planning of this area in accordance with national planning policy. It would afford a degree of certainty and bring forward a range of sites to ensure that jobs are accessible to new and existing communities, as policy SG3 requires.

### **SG6: Strategic Infrastructure**

- 2.20 Support is extended for this policy that calls for the delivery of new homes and jobs to be supported by necessary infrastructure, including a wide range of transport options, utilities, and community facilities. This policy supports the settlement hierarchy that commences with sites in the urban area of Colchester where there is sufficient infrastructure capacity to support new development.
- 2.21 The Plan refers in paragraph 4.56 to an Infrastructure Delivery Plan (IDP) that the Council will prepare to provide specifics on the main items of infrastructure, when they are likely to be provided and who will pay for them. We submit that the IDP is required at an early stage together with a housing trajectory, to plan positively for development and infrastructure, as the NPPF requires. The accompanying PPG confirms (para ID-12-018-20140306) that



*“The Local Plan should make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development. This may help in reviewing the plan and in development management decisions. For the later stages of the plan period less detail may be provided as the position regarding the provision of infrastructure is likely to be less certain. If it is known that a development is unlikely to come forward until after the plan period due, for example, to uncertainty over deliverability of key infrastructure, then this should be clearly stated in the draft plan.*

*Where the deliverability of critical infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements and alternative strategies. The detail concerning planned infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme that can be updated regularly. However the key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself.*

In the context of this guidance it is important that key sites such as land to the west of Stanway and indeed the Garden Communities are planned from the outset in terms of specific allocations or in the case of the latter, broad areas of search.

### **SG8: Developer Contributions and Community Infrastructure**

2.22 This policy confirms the importance of the preparation of an IDP early in the plan making process as a guide to how policy will be implemented and how, and when developers may be expected to contribute towards the delivery of relevant infrastructure. Understanding when strategic local infrastructure improvements are required and how these fit in with the pattern and scale and timing of development is a prerequisite of a plan being found to be sound.

### **ENV1: Natural Environment**

2.23 This policy seeks to conserve and enhance Colchester’s natural and historic environment, countryside and coastline. It is this predominantly rural and rich historic environment and diminishing supply of brownfield land that has led to a future growth strategy that relies on greenfield sites such as the urban extension to the west of Stanway and new Garden Communities such as that at Marks Tey. It is in this context that the proposal for 500 dwellings west of Stanway is vital to meet growth early in the plan period. In the context of ENV1 that stresses the need for ecological survey this has been undertaken for land west of Stanway. The site would not impact upon the borough’s Area of Outstanding Natural Beauty, coastal protection Belt or other protected land subject designated at Special Protection Areas, Special Areas of Conservation or Ramsar Sites.



### **WC1: Stanway Strategic Economic Area**

2.24 In response to this policy we confirm that land east of Stane Park employment site, and adjoining the northern boundary of land being developed for housing by Persimmon and Bellway, is not suitable for inclusion within this SEA. We propose that this be relocated to a more sustainable and accessible location within the proposed urban extension to the west of Stanway (for clarification see plan in the Local Plan Representations at Appendix 1). This will adjoin and be complementary to existing employment and commercial uses and is an equally sustainable location. The proposed mixed use scheme allows for the employment to be properly integrated with proposed housing and permits a residential use on the current allocation.

### **WC2: Stanway**

2.25 The supporting text for policy WC2 confirms that Stanway has been the location for significant growth over the years. Land has been allocated in the Adopted Plan and further growth identified in this emerging Plan. Paragraph 6.71 confirms the sites where there are opportunities for development. This includes land to the west of Stanway referred to as Wyvern Farm. This is said to be “identified in this plan for additional housing growth”. Paragraphs 6.73 to 6.76 then go on to set out the sites identified for growth. In accordance with a change made to the Plan prior to its consideration by the Local Plan Committee on 5 July 2016, paragraph 6.75 relating to land between London Road and the A12 to the west of Stanway was withdrawn. The Plan now runs from paragraph 6.74 to 6.76. We submit that given the importance of this site within the settlement hierarchy and in view of the limited supply of available sites for development, the relevant paragraph should be reinstated to give clarity and certainty to the plan as required by national planning policy. Reference to the representation site has been removed from the policy and should be reinstated.

### **Paragraphs 6.93 – 6.95; Garden Communities**

2.26 This text confirms the importance of the proposed Garden Communities to the spatial strategy for growth in the new Local Plan. Paragraph 6.94 refers to the ‘broad locations’ that have been selected and “made on the basis of their levels of sustainability and deliverability, using evidence gathered on environmental constraints, infrastructure requirements, development capacity, and viability”. It is submitted that the Plan is not supported by a plan indicating these broad locations. Identification of the new communities is shown on a key diagram that is not on an Ordnance Survey base.

### **2.27 The PPG confirms:**

*“Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions).*

*The policies map should illustrate geographically the policies in the Local Plan and be reproduced from, or based on, an Ordnance Survey map.*



### 3.0 SUSTAINABILITY APPRAISAL

- 3.1 A Sustainability Appraisal Environmental Report has been prepared by the Spatial Policy Team at the Council in respect of Part Two of the emerging Local Plan. This was published *after* the Plan had been taken to the Local Plan Committee on 5 July and change made in respect of land to the West of Stanway.
- 3.2 Section 7.11 considers Policy WC2 – Stanway (West). Although Land to the west of Stanway is not included, an assessment of policy WC2 confirms a positive finding in terms of whether it will deliver sufficient houses. We query whether the assessment had been carried out prior to removal of the reference to this representation site and the 500 homes that it could provide. Without it, the remaining sites will fail to achieve the target for growth at Stanway set out in the table to policy SG2. Without this site the policy and delivery of housing in the plan is not sustainable and the Plan as currently drafted is unsound.

#### Appendix 1 Detailed Site Allocations and Alternative Appraisals

- 3.3 pages 376 to 381 assess the preferred site allocations in Stanway. Land between London Road and A12 at Stanway, subject of these representations (site Reference STN09) is considered as an “Alternative Site Option in Stanway”.

The site is said to have been rejected for the following reasons:

“The site has been promoted for development, is in single ownership and its current use does not prevent development from coming forward. In terms of sustainability the site is close to key services and facilities and well served by public transport. The site is large enough to accommodate new play facilities and public open space. In addition, the Local Plan is addressing healthcare issues through partnership with the NHS and Essex County Council. In addition a new secondary school would be provided if any largescale development west of Colchester comes forward. A new primary school is also to be delivered in Stanway as part of the Lakelands development which will increase the number of primary school places in the area. Definition for any further growth at this scale in Stanway will be considered after the boundaries for the proposed Garden Community to the west of Colchester are defined.

- 3.4 It is submitted that the above statement does not justify rejection of the site. On the contrary it is accepted that it is a sustainable site and rejection on the grounds of its relationship with the proposed Garden Settlement is absurd and contrived.
- 3.5 We submit that the following table that compares the preferred sites against this alternative, is flawed in terms of its findings. By way of example the representation site scores less favourably than the preferred sites in terms of its ability to provide sufficient housing. It also scores less favourably in terms of access, distance to a primary school and secondary school, cultural heritage, visual impact and so on. This assessment and findings are contrary to paragraph 6.75 of the plan that was removed on the night of the Local Plan Committee



meeting on 5 July 2016. Previously the Council had found this site to be highly sustainable and capable of delivering approximately 500 new homes together with open space and community facilities, including a primary school. We confirm that the promoter's proposals include a full range of uses to support the proposed new housing including retail, commercial, employment, community facilities, a primary school and open space provision.