

Colchester Local Plan Reg.19 Draft Response on behalf of Seven Parishes Group

Approach to the Local Plan

The Seven Parishes Group (SPG) represents the communities of Aldham, Chappel, Copford, Easthorpe, Eight Ash Green, Great Tey, Marks Tey and Wakes Colne. This largely rural area west of the City is dominated by the A12 and A120 Trunk Roads, the A1124 Colchester to Hedingham (towards Haverhill and Cambridge) and the main line railway from Norwich to London Liverpool St. However, the villages are largely surrounded, and separated from each other, by open countryside; with the Colne Valley to the north and the Roman River Valley flowing west to east from its source in Gt Tey north of the A120 and alongside part of the Marks Tey to Sudbury Branch Line. The Roman River Valley forms a key element of the Essex Local Nature Recovery Strategy.

The SPG was formed in response to the Reg18 Draft Plan when it was clear that the emerging strategy and scale of development proposed in the seven villages took no account of the cumulative impact across these settlements. Little or no engagement was undertaken with the local communities in the formulation of the Reg.18 Draft and Neighbourhood Plans were largely ignored.

Representations to the Reg.18 Draft by the SPG sought a dialogue to develop a more comprehensive assessment of the cumulative impact of doubling the population of the seven communities, that are characterised by existing problems of poor connectivity by public transport, limited opportunities for Active Travel, and limited facilities in terms of schools, and access to health provision etc. However, the only engagement by the City Council with the SPG following the Reg.18 was one meeting to advise us that the housing allocations were to increase by a further 10% with no explanation as to why the additional sites had been chosen, other than they had been put forward in the original Call for Sites.

These representations on behalf of the SPG should be read in parallel with the individual representations of each of the Parishes which underpin the broader principles here with detailed comments and objections that support the contention that as currently drafted the Plan is not justified, not effective nor deliverable and hence not sound.

Chapter 2 Vision

The Draft Local Plan Reg.19 now proposes an increase in housing within these parishes of 3800 new homes, more than double the estimated number of existing homes. **The SPG object to the Plan as drafted as it fails to justify the strategy to allocate this number of homes to these villages.** Furthermore, the Plan does not provide sufficient evidence that the impact can be adequately mitigated, nor that any mitigation is deliverable in its current form.

The SPG object to the current wording of the Vision set out in para.2.21 of the Plan because the claim it ‘will improve the quality of life for our communities’ is not evidenced through the rest of the Plan. The Vision should be amended to acknowledge that the level of change envisaged by the Plan will create significant challenges,

acknowledged in para.2.15, that will need to be addressed by the Plan's policies to prevent a deterioration in the quality of life for our communities by 2043, including a direct reference to the need for significant infrastructure investment if the Vision is to be deliverable.

The laudable aspirations set out in para.2.23 do not amount to deliverable and measurable objectives by which success can be measured. The reference to creating 'communities which reduce the need to travel, particularly by car for most of their needs' will not be achieved by the current policy of 'pepper potting' housing sites across a number of poorly connected villages and settlements outside the urban area.

The SPG object to Priority 3 in para.2.24 because the scale of growth proposed in the villages means they are not 'sustainable locations', although these are poorly defined elsewhere in the Plan outside the urban area of the City. To become 'sustainable locations' for the level of growth proposed they require investment in infrastructure and services on a scale that is not achievable or deliverable with the Plan as currently drafted.

The SPG object to Priority 4 because the Plan as drafted fails to demonstrate how this will be achieved.

The SPG object to Priority 10 because the priorities must be more than just 'supporting sustainable transport...', given the Further Transport Evidence that demonstrates that pro-active measures to secure a significant modal shift towards Public Transport and Active Travel are required. Without these there will continue to be an unsustainable reliance on the car for all journeys, particularly in the rural areas outside the main urban area of the City. Significant numbers of new homes are proposed across the seven parishes, resulting in severe impacts to the detriment of both the local economy and environment.

Chapter 3 Strategic Policies

In the Adopted Colchester Local Plan 2017-33 the Spatial Strategy set out in Policy SG1 stated that growth would be located at the 'most accessible and sustainable locations'. Larger villages, outside the urban areas of Colchester, Tiptree and Stanway, were classified as Sustainable Settlements. Of the Seven Parishes Group, Copford, Eight Ash Green, Gt Tey, Chappel & Wakes Colne were included in this definition. Notwithstanding this designation only 345 new homes were allocated in these five villages. This represented just 6% of the new allocations and a proportionate response to the capacity of the villages to accommodate growth.

Although Marks Tey was identified as a Sustainable Settlement no housing sites were allocated to the village in this Plan, following the deletion of the proposed Garden Community from Part One of the Local Plan.

In the current Reg.19 Draft Policy ST3 the Sustainable Settlements have been replaced by Large, Medium and Small Settlements. Marks Tey is now defined as a Growth Area and is dealt with elsewhere. The other five villages are defined as Medium Settlements

with allocations amounting to over 1380 new homes, quadrupling the number in the current Local Plan. These villages are now taking nearly 11% of the new allocations with no evidence that they have the capacity to absorb these numbers.

The SPG object to Policy ST3 Spatial Strategy on the grounds that there is no assessment of Medium Villages to identify their current capacity for growth on this scale or to consider what level of further development would be sustainable.

Para. 3.22 makes a specific reference to the use of 'a separate adopted Development Plan Document (DPD) for the Tendring Colchester Borders Garden Community (TCBGC) but fails to translate this commitment to Policy OA5 (see below)

Para.3.25 states that Medium settlements 'will accommodate growth appropriate to the size and location of the settlement and its constraints'. However, there is no definition of 'appropriate' or 'constraints' to measure the allocations against.

Para.3.27 states that 'it is important to consider the cumulative impacts on local infrastructure.....to ensure the cumulative impacts of growth does not harm the nature role and function of the settlement'. Again there is no evidence that this cumulative effect has been considered, particularly in villages with more than one site, nor that the cumulative effect across all seven Parishes has been considered.

The SPG object to Policy ST5 Colchester's Housing Need on the grounds that the allocations to Medium Settlements has been driven largely by the response of landowners and promoters to the Call for Sites exercise carried out at the very early stage of the plan making process and before any strategy for the distribution of new housing had been considered. It would appear the Strategy has been fitted to where sites have been proposed not where new housing could best be accommodated.

Whilst the Call for Sites is an important mechanism for testing the deliverability of the Plan in terms of sites being genuinely available, this should not be the driver for the strategy of where housing would be best placed. The planning analysis should identify locations where the level of development required could be most sustainable and best absorbed. Only then should that be tested through a Call for Sites that seeks to identify deliverable sites that meet the number of new homes required in each settlement. By way of example Tiptree which is identified as a Large Settlement with a higher order of sustainability and services, including secondary school and an existing population of around 10,000, has an allocation of 700 new homes, whilst Eight Ash Green with a population of some 2000, and little in the way of services apart from a primary school and village hall has an allocation of 500, with a prospect of over 600 if a current application is approved. Where is the rationale for this in the Plan?

Para.3.49 confirms the approach is 'site led' not 'place' led, notwithstanding the use of the latter term to describe policies for individual sites. The Plan should be based on a sound analysis of the villages to which it is allocating substantial increases in size. The Strategy is largely based on the same simplistic assessment of the sustainability and capacity of settlements used for the current Adopted Local Plan when the level of

allocations were in the range of 25-75 new homes, not several hundred as now. A more sophisticated assessment is required to justify the numbers now proposed coupled with a clear statement on what is required in each settlement to sustain the numbers proposed in the Plan.

The SPG object to Policy ST7 Infrastructure Delivery & Impact Mitigation on the grounds that it is not effective because it fails to provide *certainty* that the Plan can adequately mitigate the severe impacts identified in the Transport Evidence or secure the level of investment required in the Infrastructure Audit & Delivery Plan (IADP).

The scale of the challenge needs to be stated much more clearly in this policy. The delivery of a step change in travel patterns, a significant modal shift to public transport and Active Travel plus the delivery of significant supporting infrastructure in terms of highways, education, health, utilities and green space. Policy ST7 needs to be amended to identify what success might look like in 2043 and what needs to be in place by then.

The policy states ‘Developers will be expected to’ and ‘Such measures may include...’ and ‘there are a number of strategic infrastructure requirements that all new developments will be expected to contribute to’. This wording is not strong enough to provide certainty of delivery and leaves too much to chance at the planning application stage.

The costs and viability need to be established now through policy to ensure land owners are realistic about land values at an early stage. The strategic infrastructure requirements can realistically only be delivered by a combination of public funding and CIL and this needs to be acknowledged in the Plan and in Policy ST7. On the issue of Viability and Infrastructure Delivery. The SPG support and endorse the submissions and representations made by Councillor Sunnucks on ST7. These representations confirm that the Plan is not deliverable without a clear commitment to CIL supported by a delivery plan that sets out how housing and infrastructure are to be phased in a way that mitigates the severe impact identified in the Evidence Base.

Phasing and Grampian Conditions should be explicitly linked to the delivery of strategic infrastructure to give meaning to the objective of ‘infrastructure first’.

Para.3.60 refers to the NPPF requirement that all plans should promote a sustainable pattern of development that seeks to ‘align growth and infrastructure’. As currently drafted the Plan fails to achieve this requirement because it does not clarify any direct link between the development of individual sites, or groups of sites, with the provision of infrastructure. In the absence of such links the Council will be unable to control the phasing of development at the planning application stage.

Para.3.61 states ‘all developments may [my emphasis] be required to contribute to....’ This needs to be amended to ‘will’ to have effect at planning application stage.

Para.3.62 refers to the IADP but fails to make the key elements that are essential to the Council’s claim to support ‘infrastructure first’. The plan needs to be supported and

underpinned by a clear Delivery Plan that draws on both the IADP and Transport Evidence with a clear explanation of what level of contributions are required, timetable for delivery and phasing controls on larger sites of say 100 homes or more

The SPG object to Policy 7a Sustainable Transport and Connectivity on the grounds that it is not effective in setting out the scale of the challenge to mitigate the severe impacts identified in the supporting evidence, namely the IADP and the Transport Evidence prepared for both Reg.18 and Reg.19. The Policy is aspirational but not specific and there are no clear targets to be able to assess whether the ‘vision’ has been realised by 2043.

The Policy needs to set out a clear objective to achieve a significant modal shift away from the use of the car to avoid the severe impacts highlighted in the Transport Evidence. The policy should be redrafted to draw together the key elements of the transport strategy including the strategic and local highway network improvements, enhanced public transport infrastructure, including an extended Rapid Transport System (RTS) and investment in Active Travel, in order to demonstrate how the Plan will achieve that major modal shift. Without this clarity of purpose there is a high risk the Plan and its aim to ‘improve the quality of life for our communities’ (para.2.1) will fail.

The SPG object to Policy PC2 Active and Sustainable Travel on the grounds that most of the requirements listed a – l are more appropriate to established urban areas or urban extensions but will be difficult to achieve on new developments in the villages comprising the seven parishes. In particular, ‘f. – where appropriate access to high quality public transport’. How is this achievable in developments in villages with poor levels of public transport connectivity and a deregulated bus environment where the local planning authority has no influence on frequency or level of service?

The SPG object to Policy OA5 Marks Tey Growth Area as currently drafted, on the grounds that the Council has not demonstrated the Policy is deliverable against a background of uncertainty over improvements to the A12 and A120 Trunk Roads in the Plan period and the continued uncertainty over National Highways position on further development in the future. The SPG supports the representations submitted on behalf of Marks Tey Parish Council.

The Marks Tey Growth Area (MTGA) directly affects four parishes in the SPG, namely Marks Tey, Great Tey, Aldham and Copford with Easthorpe, parts of which are within or abutting the Framework Plan boundary. Moreover, the MTGA affects all seven Parishes indirectly as a result of increased congestion on the network, pushing more traffic onto unsuitable rural roads to avoid delays, in addition to creating additional pressure on schools and local services.

Para.12.36 states that the allocation of 2500 new homes in the Plan period to 2043 is made on ‘the proviso that additional vehicular movements can be safely accommodated on the A12 and A120 without significantly increasing congestion’. In the absence of certainty on this issue, and until there is a clear strategy for the Trunk Road network in this part of the County, the Plan cannot be considered sound.

The risks are compounded by the proposals for major development immediately south west of Marks Tey at Feering and Kelvedon as part of the emerging Braintree Local Plan. In the absence of any certainty on the existing and future capacity of the A12 and A120 the reference in policy OA5 A)a) to ‘an expected larger development to be delivered beyond 2043’ should be deleted or amended to make the potential capacity of the Marks Tey Growth Area a function of the Master Plan Development Plan Document (DPD). The Growth Area needs to be properly planned and justified at the outset and ensure that further numbers are not ‘bolted on’ at a later stage, after key decisions have been made.

Notwithstanding the unresolved issue of improvements to the A12 and A120 the Further Transport Evidence (August 2026) (FTE) states in para.3.2.4:

‘the impact is of greater concern on the approaches to and off A12 Junctions: J25, J26 and J27. Such issues could, if they worsen, lead to safety issues....long queues and low speeds. This also impacts on buses and the ability to walk and cycle. Hence these problems undermine movement and connectivity at the proposed new local plan Marks Tey allocations’ [my emphasis].

The FTE recommends an ‘integrated, highways-led transport scheme’ around A12 J25 with A120 and lists ‘possible component parts’. The FTE goes on to stress in para.3.3.2 that ‘delivering RTS West alongside the early phases of development at Marks Tey presents a significant opportunity to establish sustainable travel patterns from the outset.’ Furthermore, FTE states in para.3.3.2 ‘RTS West should be planned as a scalable and futureproof transport corridor’. There is no policy reference in the Plan to delivering this key recommendation.

Policy OA5 as drafted fails to capture these key policy objectives as prerequisites of growth at Marks Tey on the scale proposed. As drafted the policy makes rather vague references to contributions towards the component parts of a strategy but fails to set out what is required, by whom and by when. Responsibility and process for designing and delivering an ‘integrated transport scheme’, incorporating highways improvements and RTS West needs to be front and centre of Policy OA5.

As advocated in the representations submitted by Marks Tey Parish Council the SPG consider that the Master Plan should (not ‘could’) be prepared and adopted as a DPD with Policy OA5 setting out the minimum requirements and objectives that the Master Plan should meet.

Chapter 12 Place Policies

The SPG collectively, and individually in separate representations, objects to a number of the Place Policies but also to the principle of how they have been drafted and prepared, not as ‘Place Policies’ but effectively ‘Site’ policies with no analysis or recognition of context, history, opportunities or problems in the individual villages, before allocating further development. Approved Neighbourhood Plans exist for Copford with Easthorpe, Eight Ash Green, Gt Tey and Marks Tey and yet these appear to

have been ignored rather than being used as a starting point to help to inform quantity, location and mitigation for new allocations. No meaningful dialogue was established with communities to discuss implications of development of this scale before the Reg.18 Plan was published.

As has been highlighted elsewhere in these representations the approach taken in the Plan to consider individual sites rather than places, and not to consider the cumulative impact and implications across the geographic area of the seven parishes, has resulted in a piecemeal rather than a holistic approach to how this area can absorb the doubling of its population in 15 years and identify what new capacity is required.

The consequence of these objections is that a number of the Place Policies are currently not justified and therefore unsound. The policies need to be replaced by new Place Policies for each village setting out what is required to accommodate new development by when, and within which specific site based requirements linked to infrastructure provision and phasing can sit.

A clear example is Primary School capacity. There are five primary schools at present serving the seven villages. The IADP proposes two new schools to serve the Marks Tey Growth Area, one of which may also serve Copford. However, the increased demand is likely to result in children not being able to secure place in their village school resulting in more travel and disrupting social cohesion.

Chappel & Wakes Colne - population 1036 (2021 Census)

PP27 and 28 propose 235 new homes likely to give rise to 50% or more increase in population

Using information in the IADP these two sites could generate up to 70 primary school age children Chappel School currently has a capacity for 105 pupils and whilst there is some spare capacity it would not be sufficient to accommodate this increase.

The viability of the PP28 has not been tested to show that the level of infrastructure required under PP28b can be met with policy compliant affordable housing.

The justification for allocating this site is presumably its proximity to the station which has limited hourly service to Marks Tey or Sudbury but not to Colchester. Apart from the school, pub and PO Stores there are no other facilities. Public transport is poor and unreliable and it is unrealistic to suppose that the majority of journeys for work, study, retail or recreation will be undertaken other than by car. There are limited opportunities for improving Active Travel given traffic conditions on the A1124.

As currently drafted Policies PP27 and 28 are not justified

Copford with Easthorpe - population 1725 (2021 Census)

PP29a,b & c propose 420 new homes likely to give rise to nearly 60% increase in population

This level of development could generate up to 120 primary school places. Copford School currently has a capacity of 210 and currently has 202 pupils on roll,

Copford has limited facilities in terms of facilities and the services currently available on London Road, Marks Tey are a 20 minute walk along heavily trafficked roads including the B1408. Further housing here is likely to increase car based movement to reach everyday facilities.

As currently drafted Policies PP29a, b & c are not justified.

Eight Ash Green – population 1769 (2021 Census)

PP32 & 32a propose 500 new homes likely to give rise to a 68% increase in population NB: Approx. 150 new homes have been built since 2021 under current Local Plan which would increase the growth of the village to closer to 90% over the Census figure.

The level of development proposed could generate up to 150 primary school places. Eight Ash Green Primary School has capacity for 140 and the school roll is currently 102 leaving only limited space for some of the numbers generated by PP32 and 32a

Connectivity to Colchester by public transport is poor and conditions on the A1124 are not conducive to Active Travel resulting in the majority of all journeys being undertaken by car.

Policy PP32a should be amended to seek a single point of access to serve PP32a and PEP9 and to form a roundabout with the existing junction of the A1124 with John Flower Avenue, with safe crossings, Travel Hub and bus stops

As currently drafted Policies PP32 and 32a are not justified

Great Tey – population 922 (2021 census)

PP36 and 36a propose 200 new homes likely to give rise to a 50% increase in population. NB: approx.45 new homes have been built or under construction under current Local Plan which would increase growth of the village to closer to 64% over the Census figure.

The level of development proposed could generate up to 60 primary school places. Great Tey Primary School has capacity for 84 and the school roll is currently 86 leaving little space for development already under construction and no capacity for PP36 and 36a.

At approximately 1.75 miles Great Tey is equidistant from the A120 and A1124, using rural roads with no safe routes for active travel and with extremely limited scope for improved public transport. Whilst the village has a small primary school and a pub and village hall there are no other facilities or services and it is arguable how this qualifies as a Medium Settlement in the Spatial Strategy given its lack of sustainability.

As currently drafted PP36 and 36a are not justified.

Aldham – population 508 (2021 Census)

PP45 proposes 15 new houses

Aldham is the smallest village of the seven but sits between the A1124 and A120 and the main part of the village is on a cross roads that forms part of a network of short cuts using rural roads to reach Marks Tey station, avoid hold ups on the A120 and A12 and avoid Colchester City to reach outlying areas north and northwest of the City. The main part of the village is poorly served by public transport. The other part of the village is Ford Street on the A1124, a Conservation Area, with a number of listed buildings, close to the River Colne and unsuitable for further development.

Representations were raised at Reg.18 stage regarding the size of the allocated site and the specific number of homes allocated in the wording of Policy PP45. This needs resolving as does the issue of whether the site would come within the definition of rural area for applying affordable housing policy DM8 to sites of 5-9.

An objection is raised to this policy on the grounds it is not effective as currently drafted and should be amended for the avoidance of doubt and the site area clarified.

Examination

It is important that the significant concerns of the Seven Parish Councils most affected by the Reg.19 Draft are properly examined before an independent Inspector and the parishes given the opportunity to explain why they believe the Plan as currently drafted is unsound and requires further evidence and modification before Adoption.

Mike Lambert MRTPI (Ret'd)

on behalf of Aldham, Chappel, Copford with Easthorpe, Eight Ash Green, Great Tey, Marks Tey and Wakes Colne Parish Councils

13th October 2026