

Colchester Borough Council Officer Comments on Copford with Easthorpe Neighbourhood Plan  
Regulation 16 Consultation

Colchester Borough Council’s Planning Policy team made comments on earlier drafts of the Copford with Easthorpe Neighbourhood Plan and these comments have been taken on board in this Submission version of the Neighbourhood Plan. The table below includes some minor comments from the Colchester Borough Council’s Planning teams in relation to the wording of the policies. We hope that these comments are helpful.

Section of the Plan	Comment
	CBC supports the vision and objectives of the Copford with Easthorpe Neighbourhood Plan.
Policy CE1	<p>Change references to ‘emerging Local Plan’ to ‘Colchester Local Plan’</p> <p>Amend text to reflect that the garden community ‘was’ proposed.</p> <p>The first two bullet points are in line with the Colchester Local Plan (para 6.146) which recognises that Copford’s close proximity to Marks Tey means that it is important to seek to prevent coalescence between the two settlements to ensure that both villages retain their individual identities. It also states that growth will be discouraged to the south of Copford to ‘discourage further development away from existing village services and facilities and to help protect the setting of Copford Green Conservation Area.</p> <p>Fourth bullet point – ‘avoid the loss of greenfield agricultural land’. The supporting text refers to ‘agricultural land’. Suggest clarification may be required on the requirement of this part of Policy CE1? The NPPF requires planning policies to recognise ‘...the economic and other benefits of the best and most versatile agricultural land...’ with the ‘Best and most versatile agricultural land’ defined in NPPF as land in grades 1, 2 and 3a of the Agricultural Land Classification.</p>
Policy CE2a	<p>Third paragraph – should this refer to the Neighbourhood Character Assessment on page 20 instead of page 26?</p> <p>Second bullet refers to ‘identified in Map 1’. Should this reference be deleted as there is no Map 1 in the Neighbourhood Plan?</p>

	<p>Recommend combining bullet point 5 with bullet point 4 – so that it is clear that features should be retained in the first instance, but that mitigation is required should features be unavoidably lost.</p> <p>Last bullet - change reference to ‘emerging Local Plan’ to ‘Colchester Local Plan’</p>
Policy CE2b	<p>Formatting of the Policy is currently different to other policies in the Plan – recommend it is amended to match the other sections to make the policy clear/stand out.</p>
Policy CE3	<p>Amend sentence of Policy supporting text (p.10) with capitals (Copford <b>D</b>esign <b>G</b>uidance and <b>C</b>odes) – as it is referring to a specific document.</p> <p>The supporting text states ‘This policy champions a principle that affordable homes will not be compromised to reduce cost’. Should this be in the supporting text for Policy CE4b as Policy CE4b refers to this principle, not Policy CE3?</p> <p>Third bullet – this refers to the Heritage List. It is assumed this is referring to the list of Designated Heritage assets and therefore could signpost to the list in the Appendix.</p>
Policy CE3, CE4 or CE1	<p>There is a strong emphasis on the historic context of the Parish in the Neighbourhood Plan, including a detailed section containing background information on designated heritage assets. It is suggested that further reference to the conservation and enhancement of the heritage assets is included in Policy, setting out how these assets should be taken account of in development proposals. It is recommended that this also includes information on the consideration of non-designated heritage assets.</p> <p>For example, as a minimum, Policy CE3 could include an additional bullet point that development is designed in a way which ensures conservation and enhancement of Copford with Easthorpe’s designated and non-designated heritage assets. Or the fifth bullet point in CE1 could be expanded to include designated and non-designated heritage assets.</p>
Policy CE4a	<p>Second bullet point – ‘Developments which have the least impact on sites with heritage, landscapes...’ This bullet point could be interpreted that there is a need for proposals to demonstrate it has least impact when compared to other sites? If the intention of the policy is in</p>

	<p>relation to development proposals, wording could be amended to ensure that development proposals ‘minimise’ their impact on heritage, landscapes or biodiversity of importance or significance.</p>
<p>Policy CE4b</p>	<p>Amend ‘Colchester Borough Council Policy H4’ to ‘Colchester Local Plan Policy DM8’ (Local Plan Policy on Affordable Housing is Policy DM8)</p> <p>Local Plan Policy DM8 requires ‘...30% of new dwellings (including conversions) on housing developments of 10 or more dwellings (major developments) in urban areas and above 5 units in designated rural areas (in accordance with Planning Policy Guidance), should be provided as affordable housing (normally on site).’ The Policy does also state that ‘At present the overwhelming need in Colchester is for affordable rented properties, which should be reflected in development proposals.’</p> <p>Policy CE4b requires ‘A mix of tenure with a minimum of 30% of rented properties...’</p> <p>It is not clear if the policy was intended to be in line with Policy DM8 and that 30% of dwellings provided should be provided as affordable housing, or if a different approach was intended to be taken with a variation in the tenure mix. A different approach can be taken locally as long as the evidence is available to justify it. The evidence base for the Neighbourhood Plan includes the RCCE survey (2020) which is referred to in the supporting text in the Neighbourhood Plan alongside data from the CBC Housing Register.</p> <p>Or was the intention that 30% of the 30% affordable housing requirement should be rented properties?</p>
<p>Policy CE7b</p>	<p>Fourth, fifth and sixth bullet appear to be part of the same requirement and therefore suggest combining them as one bullet point.</p>
<p>Neighbourhood Character Assessment p.20</p>	<p>Add date/year for Colchester Landscape Character Assessment report (2005)</p>