Carpenter Planning

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Options Draft Local Plan'.

Land off St John's Road / Harwich Road, Colchester

ON BEHALF OF THE ST. JOHN'S FIELDS RESIDENTS ASSOCIATION AND OTHERS.

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1. Introduction

1.1. Carpenter Planning Ltd, on behalf of the St John's Residents Association, St John's Fields Action Group, submits this formal representation objecting to the inclusion of St John's Fields in Policy PP9 in Colchester City Council's 'Preferred Options Draft Local Plan'. It objects to the inclusion of land at St Johns, identified in Appendix 1 and Appendix 2 attached, for housing or any infrastructure, other than designated public open space, green infrastructure, or the net gain element of the overall development allocation.

1.2. The St John's Residents Association received formal support from 146 residents who requested that their names be included within this report, in addition to 1,418 individuals who signed the associated petition in objection to the proposals.

1.3. The NPPF in paragraph 16 sets out that Plans should, among other things:

'(a) be prepared with the objective of contributing to the achievement of sustainable development [10];'

This is referenced to a footnote stating as follows:

'This is a legal requirement of local planning authorities exercising their plan-making functions (Section 39(2) of the Planning and Compulsory Purchase Act 2004).'

1.4. It will be asserted in this report, supported with evidence, that the Council has failed in its duty to demonstrate this allocation is sustainable. Insufficient evidence and survey material has been gathered by the Council, particularly in respect of the impact on biodiversity and Bullock Wood (SSSI), to demonstrate that the development can be carried out in a sustainable manner.

1.5. Paragraph 36 of the NPPF continues to state that Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are sound if they are positively prepared, justified, effective and consistent with national policy.

1.6. It is contended that the Plan fails the test of soundness in respect of:

b) **Justified**- an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence: and

d) **Consistent with national policy**- enabling the delivery of sustainable development in accordance with the policies in this framework and other statements of national planning policy, where relevant.

1.7. This objection is based on the premise that, as stated in paragraph 1.3 above, the Council has not demonstrated the development allocation is based on proportionate evidence, and it can be carried out sustainably. Furthermore, it

will be demonstrated that as well as being unsustainable, the allocation fails to comply with the NPPF, the Council's own policies in the Local Plan, and national legislation in particular the Wildlife and Countryside Act1981 as amended, and Circular 06/2005.

1.8. This representation provides evidence under thematic headings as follows. Under the ecology and woodland sections support is provided by appropriate specialist consultants in appended reports.

2. Harm to Biodiversity, Ecology Wildlife, and Green Corridors

2.1. The St John's Fields allocation within Policy PP9 lies immediately adjacent to Bullock Wood — a designated Ancient Woodland and Site of Special Scientific Interest (SSSI) that supports irreplaceable habitats, including ancient dry oak forest and plateau Alder wet woodland communities. Its proximity presents a fundamental and unmitigated threat to biodiversity, ecological connectivity, and wildlife corridors in north-east Colchester.

2.2. The Council's own background evidence consistently shows that development on this land would result in significant ecological harm, yet the statutory requirements of national and local policy for safeguarding such sensitive habitats have not been met. The Local Plan evidence base fails to demonstrate how the scheme could avoid, mitigate, or compensate for the likely adverse effects on Bullock Wood or the wider ecological network.

Evidence from the SLAA Methodology

2.3. The Strategic Land Availability Assessment (SLAA) Methodology (December 2023) states that a site is considered "suitable" only where constraints are absent or can be overcome through reasonable mitigation. In the case of St John's Fields, the constraints identified — proximity to an irreplaceable habitat and ecological network — cannot be effectively mitigated. The allocation therefore fails to satisfy the SLAA's definition of suitability.

Emerging Allocations Biodiversity Study: Identifying Significant Harm

2.4. The Emerging Allocations Biodiversity Study (November 2024) describes the land as comprising arable fields, native hedgerows, and mature trees — features that together sustain species movement and local biodiversity.

2.5. Under "Harm Scoring with Justification", the study concluded:

"Development is likely to have a significant impact on the SSSI's condition through increased recreational disturbance, noise, and lighting."

This represents a clear acknowledgement of significant ecological harm to Bullock Wood and its associated habitats.

2.6. The mitigation measures listed, such as buffering the SSSI, retaining hedgerows, and securing improved management, are necessary but insufficient in practice. Delivering such measures alongside dense housing would significantly reduce the developable area and remain unlikely to prevent indirect harm (light pollution, trampling, domestic pets, and hydrological changes).

2.7. The Study also identifies potential for on-site Biodiversity Net Gain (BNG) through woodland creation and connectivity enhancement. However, achieving genuine net gain within a major residential scheme of this scale is inherently contradictory, as the same land needed for habitat expansion is earmarked for built development.

2.8. The combined allocation of Sites 10256 and 10616 (totalling around 2,000 dwellings) was identified as having "high strategic relevance" because of the cumulative effect on Bullock Wood SSSI and nearby Local Wildlife Sites. This confirms that the harm is not only localised but strategic and irreplaceable.

Landscape Character Assessment: Ecological Sensitivity

2.9. The Landscape Character Assessment (November 2024) identifies the St John's Fields plateau within the Langham Farmland Plateau (B7) character area, defined by "scattered woodland cover, including Ancient Woodland at Bullock Wood" and high-grade agricultural soils (Grade 2).

2.10. Bullock Wood is recorded as Priority Habitat, its structure of hazel, sessile oak, and coppiced understorey supporting a wide range of species. The Assessment's management strategy seeks to "conserve and enhance the rural landscape by increasing woodland cover and strengthening field boundaries." Allocating this site for housing directly contradicts that strategic approach.

2.11. The Assessment also classifies the site as moderately tranquil and relatively dark, adjacent to areas with higher light levels. Residential development would substantially increase artificial lighting and noise, disturbing nocturnal and woodland-edge species that depend on existing low-light conditions.

Strategic Biodiversity Assessment: Ecological Protection Principles

2.12. The Strategic Biodiversity Assessment (January 2025) outlines that local plans must:

- Protect and enhance statutory and non-statutory ecological networks;

- Strengthen habitat connections;
- Avoid harm before considering mitigation or compensation; and
- Enhance the biodiversity value of land outside recognised ecological networks.

2.13. The allocation of St John's Fields fails each of these criteria. It does not avoid or mitigate the harm identified, and no credible compensation package has been presented. Development here would break existing habitat corridors between Bullock Wood and surrounding farmland, undermining the local ecological network.

Strategic Land Availability Assessment: Ecological Oversights

2.14. The SLAA Stage 2 Site Assessments Report (February 2025) assigns St John's Fields "**Red**" ratings for both Greenfield status and high-quality agricultural land (Grades 1–3). However, the SLAA does not fully account for the impact of development on adjacent SSSI land, producing a misleading impression of suitability. The omission of indirect ecological effects — a requirement under national policy — renders the SLAA findings incomplete.

Habitat Regulations Assessment: Cross-Boundary Impacts

2.15. The Habitat Regulations Assessment (February 2025) identifies St John's Fields within the Zone of Influence of the Dengie, Blackwater Estuary, Essex Estuaries, and Stour & Orwell Estuaries SPA/Ramsar sites, all of which are internationally designated for bird species. It recognises potential for:

- Physical damage and loss of functionally linked land used by migratory birds; and
- Non-physical disturbance due to noise and activity.

2.16. The absence of completed Appropriate Assessment at plan stage means the Council cannot lawfully conclude that there will be no adverse effects on the integrity of these habitats. Proceeding with allocation prior to this assessment is premature and inconsistent with the Habitats Regulations (2017).

Sustainability Appraisal: Confirmed Negative Environmental Effects

2.17. The Sustainability Appraisal (February 2025) scores Site 10256 (St John's Fields) as:

- SA2 (Efficient use of land) – Significant negative;
- SA8 (Biodiversity & geology) – Significant negative; and
- SA9 (Landscape) – Minor negative.

2.18. These findings demonstrate that the site performs poorly across multiple environmental objectives, confirming that it is an unsuitable and environmentally unsustainable location for major growth.

Local Nature Recovery Strategy and Lawton Principles

2.19. The Local Nature Recovery Strategy (LNRS), guided by the Lawton Principles, seeks to create ecological networks that are "more, bigger, better and joined." Development of St John's Fields would have the opposite effect, introducing an urban barrier that fragments one of the most strategic ecological corridors in Colchester.

2.20. The site's inclusion in Policy PP9 is therefore inconsistent with both the LNRS and the Council's own environmental topic papers, which promote landscape-scale connectivity and buffering of designated habitats such as Bullock Wood.

Conflict with the NPPF

2.21. The allocation breaches the NPPF (December 2024) in several respects:

- Paragraph 188(c): Fails to minimise biodiversity impacts or deliver measurable net gain.
- Paragraph 190: Proposes development where significant harm cannot be avoided, mitigated, or compensated.
- Paragraph 191: Fails to contribute to a strategic nature recovery network aligned with the LNRS.

Collectively, these failures mean the allocation cannot be considered consistent with national policy.

Conflict with Local Plan Policies

2.22. The proposal conflicts with Policy ST2 (Environment and Green Network), EN3 (Biodiversity and Geodiversity), and GN2 (Strategic Green Spaces and Nature Recovery), all of which require development to protect and enhance ecological networks and prioritise habitat creation in opportunity areas. St John's Fields would instead fragment those very networks.

Summary of Objections relating to Biodiversity, Ecology, Wildlife and Green Corridors

2.23. In summary, the proposed development of St John's Fields would:

- Fragment wildlife corridors and disrupt ecological connectivity between Bullock Wood and surrounding habitats;
- Introduce light, noise, and recreational disturbance harmful to protected species;
- Fail to meet national and local biodiversity objectives;
- Contradict the LNRS and Lawton Principles; and
- Proceed without the necessary evidence base, surveys, or Appropriate Assessment.

2.24. The allocation is therefore unsound, failing the tests of justification, effectiveness, and consistency with national policy. The site should instead be re-designated as green infrastructure or nature recovery land forming an ecological buffer to Bullock Wood, contributing to long-term biodiversity enhancement and net gain across the district.

2.25. Attached at Appendix 3 is a survey undertaken by the residents association of the dormouse monitors at Bullock Wood. It demonstrates that the survey work undertaken has not been of a sufficient standard to provide informed results to ensure compliance with the Council's statutory duties.

2.26. Attached at Appendix 4 is a report from Martin Pugh BSc MCIEEM, Senior Ecologist, Essex Ecology, of the Essex Wildlife Trust, that highlights, with the use of maps, designations and data showing the importance and vulnerability at a landscape and ecology scale.

3. Protection of Ancient Woodland and Bullock Wood SSSI

3.1. Bullock Wood is a protected ancient woodland (SSSI) that requires strict safeguarding from adverse impacts. The NPPF and Natural England's standing advice make clear that development resulting in the loss or deterioration of ancient woodland should be refused unless there are wholly exceptional reasons, and a suitable buffer zone should be provided to avoid indirect harm (e.g. from pollution, trampling, or hydrological changes).

3.2. In this case, Bullock Wood's ecology is uniquely tied to the plateau hydrology of the surrounding fields: the wood includes rare Plateau Alder communities that thrive on seasonally high water tables. A technical hydrological note prepared for the community explains that the site's high ground feeds water into the woodland laterally; if one "changes run-off or cut hedgerow/ditch networks, you will dry the woodland edge and degrade the SSSI interest". In other words, the woodland's health is fragile and dependent on the surrounding plateau's drainage regime.

3.3. Any large-scale ground works, new drainage infrastructure, or loss of field drains on St John's Fields could alter this delicate balance, risking the drying out of ancient woodland soils.

3.4. To prevent such damage, experts recommend substantial buffers and strict water management measures. In fact, Natural England and The Woodland Trust evidence indicates that a buffer of up to 100 metres around Bullock Wood, with no built development or ground level changes, is needed to protect root zones, soil moisture, and avoid light/noise intrusion.

3.5. Policy PP9 acknowledges the need for "***a buffer to Bullock Wood SSSI***" and focusing on woodland creation to expand and buffer the SSSI. However, the policy leaves the buffer size to a future survey and proposes mitigation (e.g. improved management to reduce recreational disturbance) – measures which, while necessary, do not guarantee protection.

3.6. There is an inherent contradiction in seeking to deliver 2,000 homes within the PP9 allocation—potentially around half of which would need to be accommodated at St John's Fields, based on the figures previously attached to Site 10256—while also securing a meaningful buffer and appropriate hydrological protection for the SSSI. A 100-metre buffer, together with sustainable drainage infrastructure and green corridors, would substantially reduce the developable land available; yet providing anything less would place the ancient woodland at unacceptable risk. This raises serious doubts about both the deliverability and the soundness of the allocation. Natural England and the Forestry Commission clearly advise that development adjoining ancient woodland must include robust buffers and avoid harmful impacts—standards that cannot realistically be met on St John's Fields given its size, configuration, and environmental context.

3.7. In summary, Bullock Wood is an irreplaceable habitat and part of a nationally protected site. The policy's general assertion to protect it is undermined by the reality that intensive housing on its boundary will inevitably introduce harmful effects (hydrological change, increased recreation pressure, invasive species from gardens, lighting impacts on woodland fauna, etc.).

3.8. The allocation of this site is in direct conflict with Policy EN4: Irreplaceable Habitats, which states that development resulting in the loss or deterioration of ancient woodland will not be permitted except in cases of wholly exceptional need. No such justification is evident in this case. It also breaches Policy EN1: Nature Conservation Designated Sites, which clearly states that proposals leading to adverse effects on the integrity of a SSSI will not be supported.

3.9. Furthermore, the proposal is inconsistent with Policy EN3: Biodiversity and Geodiversity, which requires major developments to be underpinned by appropriate ecological surveys carried out by a suitably qualified professional. The absence of robust habitat and species data at this stage contradicts the policy's precautionary approach and undermines the requirement for proportionate, evidence-led decision-making. As such, the allocation cannot be considered justified in policy or ecological terms.

3.10. The allocation is therefore not consistent with national policy on ancient woodland and SSSI protection. To be sound, the plan should instead

designate this sensitive plateau edge as green infrastructure or nature recovery land, providing the buffering and enhancement that Bullock Wood requires, rather than allocating it for housing.

3.11. Attached at Appendix 5 is a report prepared by Oisin Kelly, BSc MArborA, MAE, Arboricultural Consultant, highlighting the potential harm to the SSSI and supporting the concerns raised above.

4. Visual Impact, Landscape Sensitivity, and Coalescence

4.1. The St John's Fields/Bullock Wood plateau is part of Colchester's valued urban fringe landscape, serving as a green break between the built-up neighbourhoods (St John's estate, Parsons Heath) and the rural edge towards Ardleigh.

4.2. The site is visually prominent in places, with an elevated topography near the wood, and contributes to the setting of Bullock Wood and the semi-rural character of fringe communities like Welshwood Park.

4.3. The Landscape Character Assessment classifies this area as agricultural plateau edge, and the Council's own appraisal noted likely negative landscape impacts if developed. In the Sustainability Appraisal, the North-East Colchester sites including St John's Fields were found to have negative/uncertain effects on landscape (SA Objective 9). A substantial urban extension on St John's Fields would transform nearly 40 hectares of open countryside into housing, dramatically altering local vistas and the experience of approaching Colchester from the east. This is at odds with national policy to conserve and enhance landscape quality and local strategies to protect important views and green gateways.

4.4. One key concern is coalescence. The allocation of 2,000 homes at St John's Fields and adjacent Welshwood parcels, combined with the approved Tendring/Colchester Borders Garden Community (7,500 homes) to the east, would result in a continuous sprawl of development from Colchester's urban area through to the new garden town, and further towards Tendring villages.

4.5. This loss of separation conflicts with both Colchester's and Tendring's planning objectives, which typically aim to maintain distinct community identities and avoid unbroken ribbon development. The Local Plan's own assessment flagged coalescence with the Garden Community as a red-rated risk.

4.6. Removing the St John's Fields allocation (or retaining it as green space) could instead provide a strategic gap or green wedge preventing such coalescence. The current plan, however, fails to ensure any buffer of adequate size, thereby being inconsistent with good planning practice for settlement separation.

4.7. These issues reflect a direct conflict with the Local Plan's spatial strategy. Policy ST3 and its supporting text emphasise the need to balance growth with the protection of valued landscapes, ensuring that settlements retain their distinctive identity by avoiding harmful coalescence. Similarly, Policy LC1: Landscape requires development to respect, conserve, and where possible enhance local landscape character.

4.8. The allocation of approximately 2,000 dwellings across this rural gap would undermine these principles by eroding a strategic green buffer and visually merging Colchester with the emerging Garden Community to the east. This would significantly compromise landscape character and settlement distinctiveness. In effect, the proposal disregards the plan's stated objective to maintain clear settlement separation and preserve landscape breaks — a concern already highlighted in the Sustainability Appraisal.

4.9. Visual amenity for existing residents is also a factor. Houses bordering the site, especially along St John's Road, Bullace Close, Green Lane, Dunthorne Road, and Welshwood Park, presently overlook open fields and woodland. The proposal would replace these with dense housing and infrastructure. The Council implicitly recognises the visual harm – Policy PP9 requires "***tree screening, muted colours and non-reflective surfaces at the edge of the site to help…integration within the landscape***".

4.10. While such design mitigation is welcome, it underscores that the development would be intrusive in the landscape, even with such measures. The scale of building (up to 2,000 dwellings) will inevitably erode the rural character and tranquillity of Bullock Wood's environs.

4.11. Lighting from new streets and residential development would also erode the existing dark sky qualities of this urban fringe location and negatively affect nocturnal wildlife species sensitive to artificial light. This outcome is inconsistent with Policy EN3: Biodiversity and Geodiversity, which requires development to minimise adverse impacts on wildlife, including those resulting from light pollution. The policy specifically expects proposals to demonstrate how biodiversity will be protected and enhanced, including through the management of indirect effects such as lighting on sensitive habitats and species.

4.12. In summary, the allocation poses significant landscape and visual impacts that have not been fully assessed to ensure they can be suitably mitigated.

5. Loss of Public Open Space and Quality of Life

5.1. The St John's Fields area currently functions as a de facto green open space for local communities including St John's, Parsons Heath, and Welshwood. It comprises open fields, wooded edges, and public footpaths (e.g. FP105 and others) that residents use regularly for walking, recreation, and enjoying the countryside on Colchester's doorstep. In addition there are a number of

routes that residents have walked for in excess of 20 years, which can be established as 'presumed dedication' public footpaths.

5.2. The amenity value of this valued landscape and access to it is significant, providing opportunities for exercise, dog walking, nature observation, and general well-being in an otherwise densely built-up area on the north-east of the City. Developing the site would permanently undermine this easily accessible open space/amenity, forcing residents to travel further (the next large green area is Highwoods Country Park several kilometers away) and diminishing the quality of life for thousands of existing residents.

5.3. This runs contrary to NPPF policies on promoting healthy, inclusive communities and access to green infrastructure. In addition to the loss of recreation land, there are health and environmental quality implications. Replacing open fields with an urban extension will introduce more traffic, noise, and pollution to the area, both during construction and in operation.

5.4. The increase in vehicle traffic (an estimated several thousand additional cars) will worsen air quality along local roads and around the SSSI woodland. Nitrogen dioxide (NO_2) and particulate emissions from traffic are not only human health hazards but can also affect sensitive woodland ecology (through nitrogen deposition and dust).

5.5. While Bullock Wood is not a Special Area of Conservation, its flora (lichens, bryophytes, etc.) could be negatively impacted by a cumulative rise in NOx from congested local traffic. The SA Objective on environmental quality (air, water, soil) registered negative effects for this site, reinforcing that there are air quality concerns.

5.6. Colchester's emerging Air Quality Action Plan seeks to reduce pollution, and in locating a high-trip generator site here (with limited alternatives to car travel, as discussed later) is inconsistent with those aims.

5.7. Well-being and mental health considerations are also paramount. The existing greenfield provides visual relief and a connection to nature for local residents. Removing it would urbanise the outlook and could contribute to stress and loss of sense of place.

5.8. Public comments in the extensive survey carried out by the St John's Residents Group stressed that "once lost, the land is lost forever" and that this development would "have a huge detrimental effect on all of our lives".

5.9. In planning terms, these concerns translate into impacts on amenity and health and wellbeing outcomes, which the NPPF and Local Plan vision both seek to protect.

5.10. The inclusion of St John's Fields within the Policy PP9 allocation fails to adequately account for these social impacts. The Plan's Sustainability Appraisal scored this site poorly on objectives related to health and liveability (for example, loss of open space and increased pollution would undermine objectives for healthy communities). Thus, the proposal is not

positively prepared, as it does not meet the objectively assessed development requirements while mitigating impact on local quality of life.

5.11. In addition, the proposal is inconsistent with Policy ST1: Health and Wellbeing, which requires development to promote access to natural environments and actively minimise exposure to pollutants and noise in order to support improved air quality and public health. The loss of this greenfield site would reduce local access to natural open space while introducing additional traffic-related emissions, directly undermining these objectives.

5.12. The allocation also conflicts with Policy GN6: Retention of Open Space, which commits the Council to safeguarding existing open spaces that contribute to the wider green infrastructure network or provide local amenity value. Development of this site would result in the permanent loss of valued green space, contrary to the policy's clear protective intent.

5.13. A more sound approach would be to retain the St John's Fields as open space (perhaps a country park or Local Nature Reserve), thereby enhancing community well-being and compensating for other planned growth in the area. It could also incorporate the net gain requirements for the development of the remainder of the allocation with fewer houses.

5.14. Attached at Appendix 6 is the Residents Footfall Survey Results results dated November 2025 for the use of public footpaths 242, 110, 109 on St John's Fields. It demonstrates the extensive use of St John's Fields for informal recreation and the value this provides to residents on this urban edge of Colchester.

6. Flood Risk, Water Supply, and Drainage Infrastructure

Flooding and Surface Water:

6.1. St John's fields lie on heavy London Clay (boulder clay) soils which have very poor infiltration capacity. The area has a history of surface water pooling and lies within the St John's Critical Drainage Area, indicating that even current conditions lead to seasonal ponding and overloaded drainage channels.

6.2. The development and hard-surfacing of this c.77 hectare greenfield plateau would significantly increase the volume and speed of surface water run-off into Salary Brook, the downstream watercourse serving Welshwood, and into the culvert under St John's Road, adjacent to St John's playing field that serves St John's Fields. This raises the risk of elevated flood peaks affecting communities further along the catchment. Such an outcome is incompatible with Policy EN8: Flood Risk and Sustainable Drainage, which requires that development be steered away from areas of flood risk and must demonstrably avoid increasing flood risk either on-site or elsewhere.

6.3. St John's Fields lies within a designated Critical Drainage Area, where surface water pooling is already known to occur. However, no viable or deliverable

drainage strategy has been presented to ensure that additional run-off from extensive impermeable surfaces can be effectively managed without exacerbating downstream flooding. Consequently, the allocation fails to comply with the Local Plan's flood risk safeguards and undermines its commitment to climate change adaptation by introducing avoidable flood hazards.

6.4. The Sustainability Appraisal identified this allocation as having potential 'negative effects' on water (SA14), reflecting flood risk and water infrastructure concerns. While Sustainable Drainage Systems (SuDS) are proposed to attenuate flows, the Water Cycle Study warns that on the local clay soils, infiltration-based SuDS are largely unviable, and any surface water schemes are uncertain in their effectiveness.

6.5. The Policy PP9 accordingly requires that development "***must discharge attenuated surface water to a waterbody and not to the combined sewer***", essentially mandating onsite attenuation and controlled outflow. However, without high infiltration, this implies large attenuation ponds or tanks will be required to allow slow infiltration of surface water run-off from St John's Fields into the shallow layer of sand and gravel that sits on the London Clay, and a reliance on Salary Brook to take the flow from site 10616 (Welshwood) – a solution that may still exacerbate downstream flood risk under heavy rainfall and future climate change. Furthermore, it has already been identified in this report that changes in the water table, drainage flows, drainage works, affecting the vicinity of Bullock Wood could upset its delicate ecological balance.

6.6. The plan and background studies have not demonstrated that this can be safely achieved, whilst protecting matters of acknowledged importance. This renders the development of St John's fields as unproven in respect of climate-resilience and surface water flooding.

Water Supply and Wastewater:

6.7. The evidence base indicates severe constraints in water infrastructure for this area. According to the Colchester Water Cycle Study (2025), the Essex-Suffolk Water's Essex South Water Resource Zone is already under "***serious water stress,***" facing a supply deficit unless new sources or demand management interventions are put in place.

6.8. Adding large quantities of new homes in North-East Colchester would further strain potable water supply. On the wastewater side, "***Colchester Wastewater Treatment Works will need expansion after 2030 (AMP8)***" to accommodate growth, and parts of the sewer network are already at capacity, with some combined sewer overflows in the borough breaching environmental targets.

6.9. The Water Cycle Study's site-specific assessment flagged St John's Fields, (Site 10256), for uncertain foul sewer capacity and hydrological constraints. In fact,

the study concludes that without significant upgrades, new development in this quadrant may have to be phased late in the plan period (after major infrastructure improvements), as early phases could be "***undeliverable***" due to lack of network capacity. This directly impacts the effectiveness of the allocation – if homes at St John's Fields cannot be connected to adequate water and sewer services until the 2030's, the site will not deliver as assumed in the housing trajectory.

6.10. Policy PP9 attempts to tackle these issues through numerous caveats. It requires demonstration of "***adequate capacity for managing wastewater including proposed phasing***", and extraordinary measures such as "***removal of unrequired network flows***," "***targeted education [of] new residents***," and "***reduction in demand for potable water***" to mitigate sewage treatment impacts. These provisions underscore that infrastructure is not currently in place – essentially, the plan is deferring the solution to future actions and behaviour change that cannot be assumed.

6.11. Such reliance on uncertain future measures (e.g. hoping residents use less water or awaiting utility upgrades that are outside the planning authority's control) highlights a failure to be positively prepared to deliver the development.

6.12. This weight of evidence shows that the allocation is being made in advance of infrastructure certainty – questioning the deliverability and robustness of the allocation. The PP9 allocation cannot be developed at the proposed scale of 2000 houses without causing unacceptable flood risk or relying on major utility improvements that are not guaranteed. Therefore, the allocation fails the "effective" test of soundness.

7. Climate Change Resilience and Surface Water Management

7.1. Developing the St John's Fields site raises questions in terms of climate change adaptation. Building on a greenfield of this nature – heavy clay soil, uphill of a flood-prone brook and culvert at St John's Road, adjacent to sensitive woodland – is contrary to the principles of climate resilience.

7.2. Greenfields like St John's Fields currently act as a sponge (albeit limited by clay, they still provide some infiltration and storage), and as open land they help regulate local temperatures and sequester carbon. Paving them over will increase run-off and the urban heat island effect, just as climate science predicts more intense rainfall events and heatwaves in coming decades. The Local Plan's vision is to address climate change, yet this allocation would exacerbate climate risks rather than mitigate them.

7.3. The Water Cycle Study explicitly notes that in this area "***infiltration [is] limited on local clays; SuDS [are] essential but uncertain***". In a climate of heavier downpours, relying on engineered SuDS is precarious – if those

systems fail or are overwhelmed, flooding will result. By contrast, leaving land undeveloped would improve absorption and flood buffering.

7.4. The LNRS approach highlights that habitat creation can deliver climate benefits such as "***absorption of water to reduce flooding***" and carbon sequestration. In other words, St John's Fields is far better suited to serve as part of a nature-based climate solution (e.g. reforesting or wetland creation to buffer Bullock Wood and slow run-off) than as a hardstand for new housing.

7.5. The plan's Sustainability Appraisal and Environment Report acknowledge the need to reduce greenhouse emissions and build resilience, but allocating this site undermines those objectives. It would encourage car-dependent housing (increasing emissions) and puts more people and property in an area of surface water risk.

7.6. From a mitigation perspective, large new greenfield estates are challenging to build to net-zero carbon standards. While policies will require sustainable design, the embodied carbon of construction on this scale and the induced car travel make it harder for Colchester to meet its climate targets. No specific low-carbon energy or district heating proposals are mentioned for this site; it's likely to be standard housing with individual boilers or heat pumps, which does not capitalise on any locational advantage for renewables.

7.7. The hard-surfacing of this greenfield site would contribute to increased surface water run-off and urban heat stress, particularly problematic in the context of a changing climate. This directly conflicts with the Local Plan's stated ambition to deliver climate-resilient development. It breaches Policy ST1(h) and Policy ST2, both of which require proposals to minimise climate-related risks and incorporate nature-based solutions, such as green infrastructure, to enhance long-term resilience.

7.8. The proposal also contravenes Policy EN8: Flood Risk and Sustainable Drainage, as it relies on engineered drainage systems in an area with known clay soils — despite the Water Cycle Study identifying significant limitations in delivering effective SuDS in this location. This approach fails to ensure that development will remain safe from flood risk and avoid increasing flood impacts downstream, contrary to policy requirements.

7.9. In summary, the allocation is not consistent with national policy on climate change (NPPF paragraphs 152-154) which stresses risk avoidance: this site introduces avoidable climate-related risks (flooding, heat, high car travel) rather than avoiding or reducing them. A sound plan would use nature-based solutions on this land to help Colchester adapt to climate change, instead of intensifying vulnerability by building a large housing estate there.

8. Air Quality Impacts

8.1. Although not designated as an Air Quality Management Area, the north-eastern sector of Colchester is sensitive to air quality changes due to the increased traffic and proximity to ecological sites. The cumulative effect of this allocation and other planned growth is likely to increase emissions of NO_2 and particulate matter along key routes (Harwich Road, A1232 Ipswich Road, etc.).

8.2. Colchester's city-wide Air Quality Action Plan (2024) aims to reduce pollution to meet legal limits and protect health. Locating 2,000 homes in a semi-rural area will generate new commuting and service trips that contribute to pollution, in contrast to focusing development in areas with better public transport or walking links.

8.3. Of particular concern is the impact of increased traffic emissions on Bullock Wood SSSI and other nearby habitats. Ecologically, ancient woodlands can be harmed by chronic nitrogen deposition and ozone from vehicle exhausts, which alter plant communities. Bullock Wood lies very close to the likely access routes for this site – St John's Road and the distributor roads that many new residents would use.

8.4. The additional vehicles could lead to higher NOx concentrations and nutrient nitrogen settling on the woodland. While this specific impact has not been quantified in the Local Plan's Habitats/Biodiversity Assessment, it remains a concern under national policy to "***protect sites of biodiversity value from impacts of air pollution***".

8.5. For human receptors, any new congestion or slow-moving traffic will degrade air quality for existing residents along those roads. During construction, dust and diesel machinery would also temporarily reduce local air quality. Mitigation like travel plans, electric vehicle charging points, and tree planting (as required by policy) can help, but the fundamental increase in vehicle miles is the dominating factor.

8.6. The SA13 likely reflected air quality under the umbrella of environmental quality objectives (where, as noted, Site 10256 did not score well). Given Colchester's commitment to improving air quality, persisting with a development that will foreseeably worsen it is not consistent with that aspect of national policy.

8.7. This proposal is in clear conflict with Policy EN9: Pollution, which permits development only where there is no unacceptable risk to human health or the environment from air pollution. The policy also requires that appropriate mitigation measures are incorporated to safeguard and enhance environmental quality — standards that this scheme fails to meet.

8.8. In conclusion on air quality, this allocation poses avoidable risks to both human health and ecological health from pollution. Removing or reducing the allocation would alleviate these risks. If the Council truly prioritizes clean air and environmental protection, it should reconsider concentrating growth in this traffic-limited location.

9. Heritage Impacts

9.1. St John's Fields lies within a highly sensitive historic rural landscape directly associated with Bullock Wood, a medieval ancient woodland and one of England's earliest recorded plantation woodlands (established prior to 1242 under St John's Abbey). Historic mapping, including the Chapman & André Map of 1777, demonstrates that the surrounding fields formed part of a long-standing monastic and manorial agricultural pattern extending across the Manors of Lexden and Greenstead. The survival of ancient lanes, field boundaries and drainage systems evidences the area's deep historic time-depth, much of which remains legible today.

9.2. The Bullock Wood is a landscape identified as being of high archaeological and historic sensitivity. The area is characterised by eight centuries of continuous rural management and vernacular evolution, with features such as Green Lane/Clay Lane, ancient hedgerows and early enclosure field ditches contributing to the legibility of medieval and early-modern land division. These surviving components form an integral part of the historic setting of Bullock Wood and the wider historic farmed landscape, eg. Wivenhoe Park, Fen Farmhouse, Harvey's Farmhouse and Moze Hall (all Grade II listed), which collectively express the area's long agricultural narrative and architectural continuity.

9.3. Development of St John's Fields would introduce intensive new built form within the historic hydrological and agricultural hinterland of Bullock Wood. This would erode the integrity of the woodland's setting by altering the spatial relationships between the woodland, its feeder fields and historic farmsteads. The transformation of this open plateau into an extensive housing area would diminish the ability to appreciate the long-established intervisibility, rural coherence and functional associations that underpin the significance of the local landscape.

9.4. The National Planning Policy Framework (NPPF 2024) requires great weight to be given to the conservation of heritage assets and their settings (paragraphs 199–202). While Bullock Wood is not a designated heritage asset, its historic, evidential and associative value as part of Colchester's medieval monastic estate is substantial. The ability to understand and experience the relationships between the woodland, its surrounding farmland and long-standing historic routeways forms part of its heritage significance.

9.5. By contrast, the introduction of large-scale new housing, lighting and road infrastructure would fundamentally alter the character and legibility of this historic rural landscape. The enclosure of the open setting by dense urban development would weaken the ability to appreciate the area's agricultural lineage, its historic woodland–farmland associations, and the wider contextual significance of Bullock Wood.

9.6. The Local Plan's evidence base contains no detailed Heritage Impact Assessment (HIA) or archaeological evaluation to substantiate that such impacts can be mitigated. Given the demonstrable archaeological potential identified in the Heritage Report—reflecting early enclosure boundaries, possible medieval cultivation remains, and long continuity of tenure—there is an absence of proportionate evidence required under NPPF paragraph 194.

9.7. Accordingly, the allocation is not consistent with national policy on heritage protection. It does not demonstrate how the historic environment—including non-designated but locally significant heritage assets, their settings and the wider historic landscape—would be conserved or enhanced. Without this evidence, the allocation cannot be considered justified or effective.

9.8. A sound and policy-compliant approach would be to redefine St John's Fields as part of the green infrastructure and heritage landscape buffer to Bullock Wood. This would preserve the historic field network, safeguard archaeological potential, and retain the legible and functional relationship between woodland, farmland and settlement that has characterised this part of Colchester for over eight centuries.

10. Traffic Impact and Highways Capacity

10.1. The St John's Fields site, together with the adjacent proposed parcels, would generate a very large amount of traffic – in the order of several thousand additional vehicle trips per day. There are no new major roads proposed as part of the allocation; traffic would inevitably load onto the existing local network, principally St John's Road, Harwich Road (A137), Bromley Road/B1029, and the roundabouts and junctions connecting them.

10.2. These routes are already significantly congested. The Harwich Road corridor frequently suffers from long tailbacks at rush hour.

10.3. Importantly, there are known pinch-points at the Bromley Road / Parsons Heath mini-roundabout, the St John's Road / Parsons Heath mini-roundabout and the St John's Road / Ipswich Road roundabout. To link site 10616 (Welshwood) to Harwich Road (A137) a new bridge over the railway will be required, as the existing bridge serving Shaw's Farm is single track. These physical constraints severely limit how much traffic increase can be accommodated without gridlock.

10.4. It is evident that the local road network is already overwhelmed and an extra 2,000 homes would lead to very serious gridlock in this area. The Local Plan Committee rejected the draft plan in part over these infrastructure concerns, noting that adequate highways solutions had not been provided.

10.5. Policy PP9(b) says development will be supported only with "***safe and suitable access***" and if it "***would not be detrimental to highway capacity and***

safety". However, no specific highway improvements are detailed that would offset the impact of this allocation. There is no committed new road scheme or grade separation to improve the rail crossing, nor an agreed package of junction upgrades beyond minor tweaks.

10.6. Essex County Council would likely carry out a comprehensive transport assessment at the planning application stage, but at this plan-making stage, the cumulative effect of 2,000 homes (plus background growth and the Garden Community traffic) strongly indicates a severe impact. Without detailed proposals as to how the traffic issues can be mitigated, it calls into question the suitability of the allocation – if the road network cannot handle the development, the plan is not deliverable. It also raises policy conflicts with the NPPF, paragraphs 110 & 111, which prohibit development that would unacceptably impact traffic congestion or highway safety.

10.7. Additionally, despite policy aspirations for active and sustainable travel set out in Policy PP9, the site's location and scale mean cars will be the dominant mode. Existing bus services in St John's/Parsons Heath are limited, and a development of this size might warrant a new route or extension, but that is speculative at this point.

10.8. Active travel links can be improved (e.g. connecting to the Colchester Orbital footpath/ cycleway as PP9 suggests), yet many trips (commuting, school runs, shopping) will still funnel onto main roads. The air quality and carbon emissions from this traffic growth have not been fully accounted for – as mentioned, it risks increasing roadside pollution and undermining climate objectives.

10.9. This allocation conflicts with Policy ST7: Infrastructure Delivery and Impact Mitigation, which stipulates that development should only proceed where there is sufficient and appropriate infrastructure capacity in place, or where such capacity can be delivered in a timely manner. The proposed development at St John's Fields would generate substantial additional traffic movements on an already constrained road network, yet no committed mitigation measures have been secured to address this impact — directly undermining the delivery criteria set out in Policy PP9.

10.10. Moreover, the proposal is inconsistent with Policy PC2: Active and Sustainable Travel, as the site's peripheral location, combined with limited access to public transport and active travel infrastructure, makes it heavily car-dependent. This directly undermines the Local Plan's objective to promote more sustainable travel choices and reduce reliance on private vehicles in new developments.

10.11. Without a clear infrastructure solution, the allocation is not positively prepared (failing to align housing growth with transport capacity). A sound plan would either reduce the scale of development here to what the network can reasonably handle or delay it until major highway infrastructure (perhaps linked to the Garden Community) is in place – or, as we advocate,

avoid the allocation altogether in favour of locations better served by infrastructure.

11. Cumulative and Cross-Boundary Impacts

11.1. St John's Fields forms part of a broader site allocated for 2,000 dwellings. It also sits just west of the planned Tendring-Colchester Borders Garden Community (TCBGC), which straddles the border with Tendring District. It is essential to consider the cumulative impacts of all these developments acting in combination.

Cumulative environmental impact:

11.2. As noted in a Sustainability Appraisal extract, "***all five East Colchester parcels…follow the same pattern***" of sustainability issues. Together, they would present a concentrated assault on the local environment – extensive loss of greenfield habitat, heavy strain on the same watershed (Salary Brook), and a fundamental change in landscape character across the entire north-east quadrant. The ecological networks and drainage systems do not recognise the site boundaries; for instance, Bullock Wood's hydrology and the Salary Brook catchment are affected by development anywhere on the plateau or valley.

11.3. The combined run-off from multiple sites could greatly amplify flood risk (beyond the impact of one site alone). The SA flagged "***cumulative significant negative effects***" for biodiversity and water objectives under such a growth scenario. It is inevitable that adding these sites exacerbates the issues, compounding the unsustainability.

Cross-boundary coordination:

11.4. The proximity to the Tendring/Colchester Borders Garden Community is a major strategic factor. That Garden Community (if delivered) will itself provide up to 7,500 homes, new jobs, and infrastructure including roads, schools, and health facilities – effectively a new settlement east of Colchester.

11.5. Policy SP8 (Section 1 Plan, adopted) already establishes that as the primary growth locus for this area. By including St John's Fields for housing in the Policy PP9 allocation, the Council risks creating an unplanned urban coalescence between Colchester and the Garden Community. Not only would this be visually and environmentally undesirable, harmful to living conditions and health and well-being but it could also undermine the Garden Community's success.

11.6. From an infrastructure standpoint, the cumulative impacts on roads (A133, A120 junctions), healthcare (Colchester Hospital catchment), and secondary education will be immense if both the Garden Community and the

North-East Colchester sites proceed. Yet the Infrastructure Delivery Plan and transport modelling seem to be lagging or insufficient.

12. Site Selection Process and Sustainability Appraisal Failures

12.1. The selection of St John's Fields through the Local Plan process appears flawed when examined against the Sustainability Appraisal (SA) findings and the availability of reasonable alternatives. The Council's SA (Feb 2025) shows a very telling score pattern for the North/East Colchester group of sites (including 10256):

SA1 (Housing) – significant positive (because the site would contribute dwellings),

SA2 (Efficient use of land) – significant negative;

SA8 (Biodiversity & geodiversity) – significant negative;

SA14 (Water/flood risk) – significant negative.

In other words, the Council's own appraisal matrix indicates that, aside from providing housing, this location performs badly on multiple key sustainability objectives. The Council's score of a significant negative on SA2 (efficient use of land) suggests it is a poorly located, greenfield, or a sprawl-type site.

12.2. All of the Council's negative scores above support the view of the residents expressed in this report on behalf of The St John's Residents Association. The only major positive was housing delivery, which is true of almost any large site but does not outweigh the negatives in a planning balance. Under the Strategic Environmental Assessment (SEA) Directive and National Guidance, if an allocated site shows significant adverse impacts on the SA objectives, the plan-makers must rigorously compare it with reasonable alternatives that might achieve the same objectives with less harm.

12.3. This supports the importance of retaining St John's Fields as open space/biodiversity area/green corridor. The failure to demonstrate that this part of the Policy PP9 area can be developed without harm to multiple matters of acknowledged importance as identified in this report, renders this part of the allocation unsound.

12.4. Procedurally, this raises questions as to the soundness of Policy PP9 in respect of the Sustainability Appraisal/SEA front. Notably, the SA scores for St John's Fields remain negative even with mitigation, implying some impacts are unavoidable. For example, you cannot change the fact it is high-grade farmland (loss of which is irreversible), or that it's adjacent to an SSSI. Thus, proceeding with the allocation is essentially accepting a less sustainable outcome.

12.5. This is inconsistent with the requirement in NPPF (paragraph 35) that plans be justified based on proportionate evidence and reasonable alternatives considered. By contrast, removing St John's Fields from the Policy PP9 allocation, or allocating it as open space, significantly reducing the amount of housing allocated in Policy PP9, redistributing the displaced housing to a site more aligned with the SA's findings (avoiding those significant negatives), hence a more sound and legally robust plan.

13. Inconsistency with Draft Policy PP9 Itself (Undeliverable Mitigation and Infrastructure)

13.1. Finally, it is clear that the St. John's Fields allocation cannot satisfy the policy criteria of PP9 itself, resulting in an internally inconsistent plan. Policy PP9 sets numerous requirements for the North-East Colchester growth area, many of which are not realistically achievable on this site in practice:

13.1.1. **Biodiversity Mitigation and Green Infrastructure:** PP9 calls for "***strategic open space***" amounting to more than 10% of the area, "***onsite habitat creation measures***" focusing on woodland creation to expand and buffer the SSSI, a "***green corridor between designated sites***", plus buffers to local wildlife sites and to Bullock Wood SSSI itself. This could be achieved by allocating St John's Fields as open space, but this would reduce the number of houses feasible on the remaining allocation.

13.1.2. **Water Management and Phasing:** Policy PP9 stipulates that water quality in Salary Brook must be protected and that "***attenuated surface water***" must be discharged to a waterbody (not into sewers), and that adequate wastewater capacity (with phasing) must be demonstrated. Yet as detailed earlier, no firm strategy exists to ensure this. If Anglian Water cannot guarantee treatment capacity until after 2030, any phasing condition may either severely delay housebuilding or, if ignored, lead to environmental harm.

13.1.3. **Highways and Access:** PP9 requires that it be demonstrated the proposal is not detrimental to highway capacity/safety. Based on current evidence, that demonstration cannot be made for 2,000 homes in this location – at least not without major off-site works that are not committed. The policy is setting a condition that may very well not be met, meaning either the development stalls or, worse, it is approved and then does cause traffic problems (thus conflicting with the policy). A sound plan would allocate growth in quantum and locations where such basic requirements can be met straightforwardly.

13.1.4. **Community Infrastructure:** PP9 mentions the need for a new primary school and other site-specific infrastructure per the Infrastructure

Delivery Plan. However, if the site is delivered in piecemeal parcels or if viability is tight due to all the green requirements, funding and land for a school and GP provision may fall short. There is no firm commitment in the policy to when the school must be delivered, for instance relative to housing occupancy – a common failure that leads to schools lagging behind, causing strain on existing schools.

13.2. In summary, Policy PP9 is internally inconsistent and over-optimistic. It assumes unaccounted for mitigation requirements in order to overcome the considerable, identified constraints.

14. Conclusion

14.1. For all the reasons set out above – ecological harm, loss of irreplaceable habitats, flood and water infrastructure issues, community amenity loss, landscape/coalescence concerns, traffic congestion, climate inconsistency, and unsuitability confirmed by the Council's own SA – the allocation of Site 10256 under Policy PP9 is considered unsound.

14.2. It fails two of the NPPF's soundness tests (justified and consistent with national policy). The Council's evidence and consultees have essentially pointed out these failings: the SA flags significant negatives; the Water Cycle Study and infrastructure reports raise red flags; local community and even Council Members have objected vehemently, causing plan delays.

14.3. We therefore respectfully urge that St. John's Fields be removed from the allocation under Policy PP9, or allocated as open space, protected green infrastructure – a logical extension of the Green Network – and potentially an LNRS priority habitat area delivering biodiversity net gain for Colchester.

14.4. In conclusion, we submit that the inclusion of St John's Fields in the allocation under Policy PP9 is not sound allocation, and undermines the Local Plan's compliance with national policy, Local Plan Policy and legal requirements. We ask the Council and the Inspectors to give full consideration to this objection.

Lucy Carpenter MRTPI

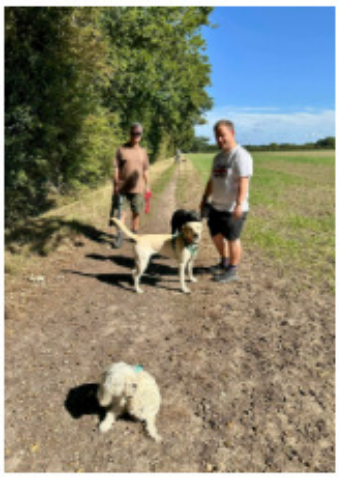
Carpenter Planning LTD

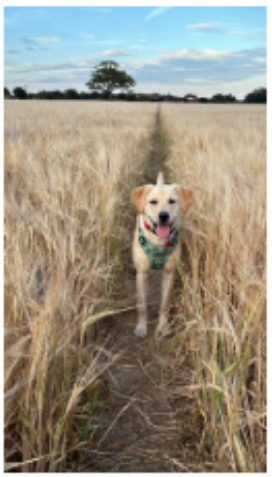
November 2025

Appendix 1 – Photographs of St John's Fields

a) Nature

b) Recreational Use






c) The Resident's Association & Local Support

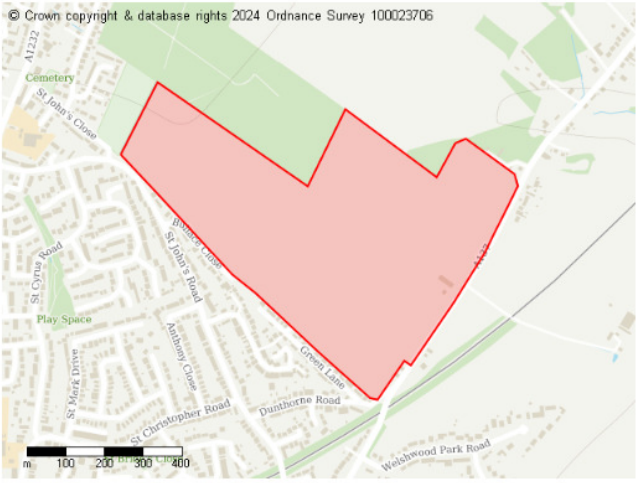
Group aiming to stop 2,000 homes plan in earmarked Colchester fields

Gazette

d) The impacts seen, traffic & flooding

Appendix 2 – Land to which the objection relates.

Site ID: 10256



Site details

Site address

Buildings Farm, St Johns Road, Colchester, CO40JQ

Site area (hectares)

38.889000000000003 ha

Proposed Future Use

Residential

Appendix 3 – Dormouse Survey Results.

ST JOHN'S RESIDENTS ASSOCIATION

St John's Residents Association Survey of the Dormouse Study – October 2025

Introduction

A significant number of dormouse boxes were placed on the edge of Bullock Wood and in the hedges of the surrounding fields in mid July 2025. In addition, there were mats left along the edges of the same areas. It is assumed this was part of a wider ecology study, but it is unknown who this was commissioned by.

The ecologist commissioned by the St John's Residents Association noted that many of these boxes were inappropriately placed to hinder reliable information for any ecology report. The Resident's Association were also advised that these studies should be placed much earlier in the year around Springtime to obtain correct data. It was recommended that the Resident's Association log all the boxes including type of box, number on box, location (What 3 words), and positioning to ascertain whether the dormouse survey had been undertaken correctly and therefore whether any reports resulting from this survey could be relied upon to provide accurate data.

What a Dormouse Survey Should Look Like

A Dormouse Nest Tube Survey should provide consistent, reliable data about dormouse presence and habitat use. To achieve this, the following best practices are recommended:

- Tube Placement: Securely position tubes in mature shrubs or trees, ideally at chest height (1.2–1.5 m), angled slightly downward to prevent rain ingress.
- Habitat Coverage: Evenly distribute tubes across varied vegetation types, avoiding over-representation of garden edges or open areas.
- Condition & Access: Ensure each tube remains intact, accessible for monitoring, and positioned to allow dormice natural entry and exit routes.
- Recording: Document tube condition, placement type, and activity signs accurately, following national guidance (e.g., PTES or NDMP standards).

Dormouse Nest Tube Survey Summary

Total tubes surveyed: 115

Position in Tree

Placement Category	Count / Percentage
OK (Good placement)	32 tubes (28%)
Exposed / Wrong Angle / Spindly Branch	30 tubes (26%)
Wrong Angle only	19 tubes (17%)
Broken / On floor	18 tubes (16%)
Spindly Branch only	8 tubes (7%)
Other placements (e.g. garden access, edge of hedge, feeder/camera, no entry/exit)	8 tubes (7%)

🔎 **Insight: Only 28% of tubes were in optimal condition. The majority (over 60%) had issues related to placement, exposure, or damage, which could impact dormouse activity and data reliability.**

Type of Monitoring

Type	Count / Percentage
Ink tubes	39 (34%)
Trap tubes	76 (66%)

🔎 Insight: Trap tubes were used more frequently than ink tubes, possibly indicating a focus on capturing or confirming presence rather than tracking movement.

Findings

The findings of this survey demonstrate that the dormouse survey was not carried out in accordance with current best-practice guidance, including the late commencement of survey effort. Consequently, the data obtained is unreliable and should be considered invalid and inadmissible for the purposes of informing decision-making.

Recommendations Based on Survey Findings

• Improve Tube Placement Training: Provide clearer guidance or refresher training to reduce issues with exposure, wrong angles, and spindly branches.

• Inspect and Replace Damaged Tubes: Regularly check for and replace broken or fallen tubes to ensure data quality and safety.

• Balance Monitoring Methods: Consider increasing the use of ink tubes if movement tracking is a priority, as trap tubes currently dominate.

• Refine Placement Strategy: Aim to increase the proportion of tubes in optimal 'OK' condition by reviewing placement criteria and site selection.

- Requires that any dormouse studies submitted in evidence for planning applications for the fields surrounding Bullock Wood should be repeated over a longer period of time and using the correct methodology.

Appendix – Detailed Data Tables

Position in Tree Summary:

Placement	No.	%
Broken / On floor	18	16%
Exposed / Wrong Angle / Spindly Branch	30	26%
OK	32	28%
Spindly Branch	8	7%
Wrong Angle	19	17%
Access in front of Garden	2	2%
Outside, Edge of hedge	4	3%
Feeder & Camera	1	1%
No Entry / Exit	1	1%

Type Summary:

Type	No.	%
Ink	39	34%
Trap	76	66%

Appendix 4 – Report by Martin Pugh BSc MCIEEM, Senior Ecologist, Essex Ecology, of the Essex Wildlife Trust.

APPENDIX 4:

ECOLOGICAL REVIEW OF ST JOHN'S FIELDS AND BULLOCK WOOD SSSI

December 2025

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Title of Report	Appendix 4: Ecological Review of St John's Fields and Bullock Wood SSSI
Client	St John's Field Residents Association
Client Representative	Sarah Kench, Chair of St John's Field Action Group
Survey Completed By	Martin Pugh BSc MCIEEM, Senior Ecologist
Author	Martin Pugh BSc MCIEEM, Senior Ecologist
Reviewed By	Dr Jeremy Dagley PhD MCIEEM, Conservation Manager
Report Status	Final
Date of Issue	4th December 2025

This report has been compiled in accordance with BS 42020:2013 Biodiversity – Code of practice for planning and development, as has the survey work to which it relates.

The information, advice and opinions provided here have been prepared in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the views expressed are our true and professional *bona fide* opinions.

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APPENDIX 4: ECOLOGICAL REVIEW OF ST JOHN'S FIELDS AND BULLOCK WOOD SSSI

1. EXECUTIVE SUMMARY

This Appendix provides a high-level ecological appraisal of St John's Fields and its functional relationship with Bullock Wood SSSI and nearby Local Wildlife Sites (LoWS) – in the context of the current proposed housing allocation as outlined in the Colchester City Council Local Plan. The assessment is based on:

- A walkover visit in October 2025;
- desk-based review of SSSI and LoWS citations;
- aerial imagery, historic mapping and topographic context, and
- applicable ecological policy and statutory guidance (including Circular 06/2005 and BS 42020).

Because the walkover occurred outside the optimal season, no detailed species surveys (such as bats, dormice, breeding birds, invertebrates and reptiles) were undertaken. Accordingly, the assessment presents broad ecological constraints and identifies mechanisms of impact typically associated with development adjacent to ancient woodland.

Bullock Wood SSSI is an irreplaceable ancient woodland, supporting rare Hazel–Sessile Oak and Plateau Alder communities strongly dependent on the plateau's characteristic hydrology, levels of darkness, soil profiles and low disturbance. St John's Fields form the immediate ecological setting of the SSSI, providing:

- **hydrological continuity** from the plateau into Alder and acid-woodland zones;
- **dark, unlit corridors** enabling movement of bats and nocturnal invertebrates;
- **semi-natural farmland margins and hedgerows** connecting Bullock Wood to Welsh Wood, Wall's Wood and Ardleigh Reservoir woodlands;
- **buffering from urban-edge pressures** such as trampling, lighting and nutrient enrichment.

Large-scale residential development would introduce persistent lighting, increased noise levels, altered drainage patterns, soil compaction, recreational pressure and domestic predator presence. These effects – particularly hydrological change and severing of dark

corridor – are widely recognised as difficult or impossible to fully mitigate for ancient woodlands and SSSIs.

Based on available evidence, significant ecological sensitivity exists and several significant gaps in information remain (notably hydrology, bats, breeding birds, dormice, invertebrates). It is therefore not possible, at this stage, to determine exact extent or scale of impacts on special features within Bullock Wood SSSI; however, it is clear there would be loss of ecological functionality of Bullock Wood alongside further fragmentation of habitats and severing of existing ecological corridors on a landscape scale.

2. INTRODUCTION

This Appendix summarises ecological considerations relating to the proposed allocation of St John's Fields for housing under Policy PP9. The assessment focuses on:

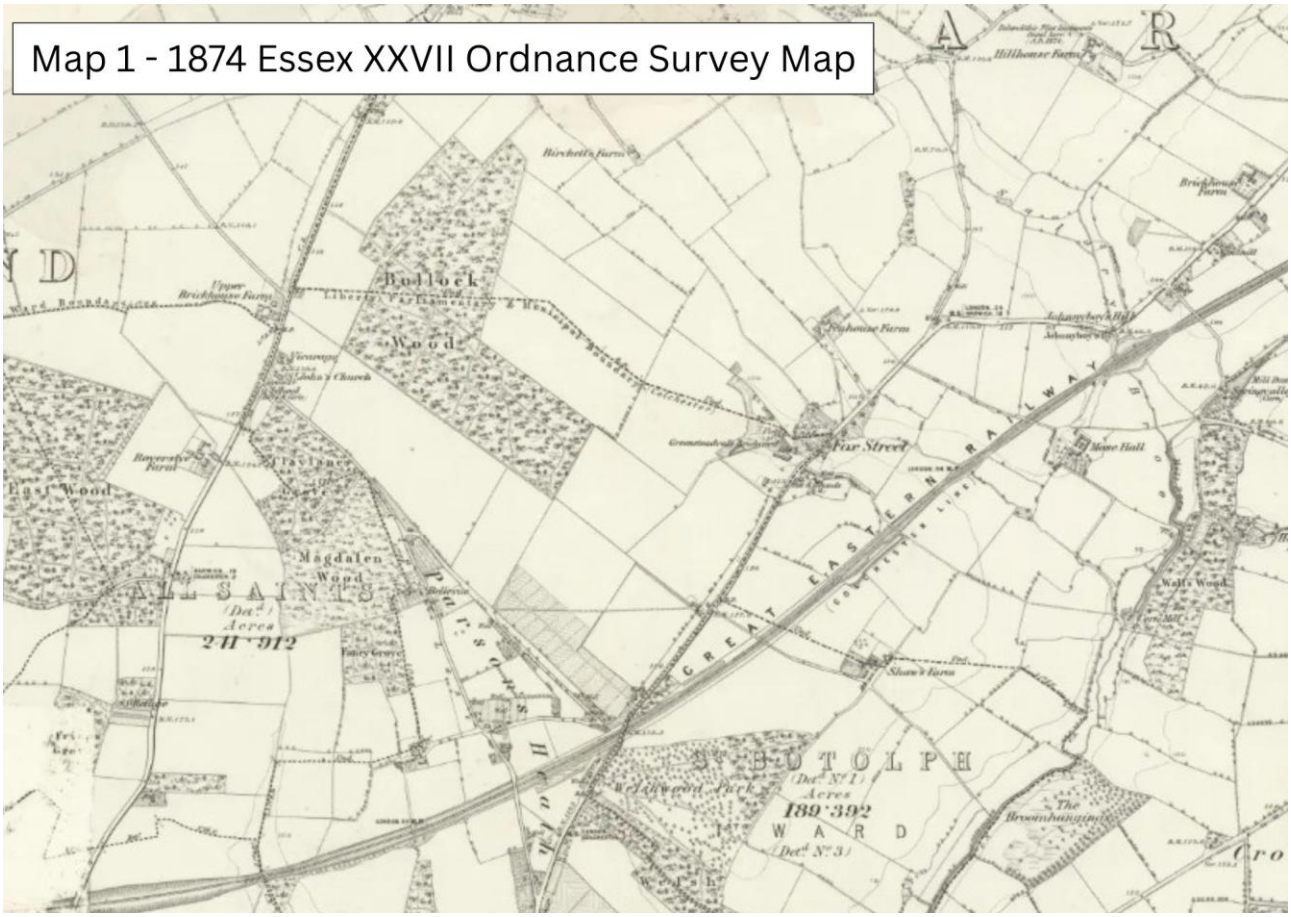
- the ecological characteristics of Bullock Wood SSSI;
- its dependencies on the surrounding plateau and rural setting;
- the functional role of St John's Fields within the wider landscape; and
- typical indirect impacts associated with adjacent development.

The review does not provide a judgement on planning soundness. Its purpose is to outline ecological sensitivities and highlight where effects on the SSSI's special interest features may be difficult to avoid or mitigate.

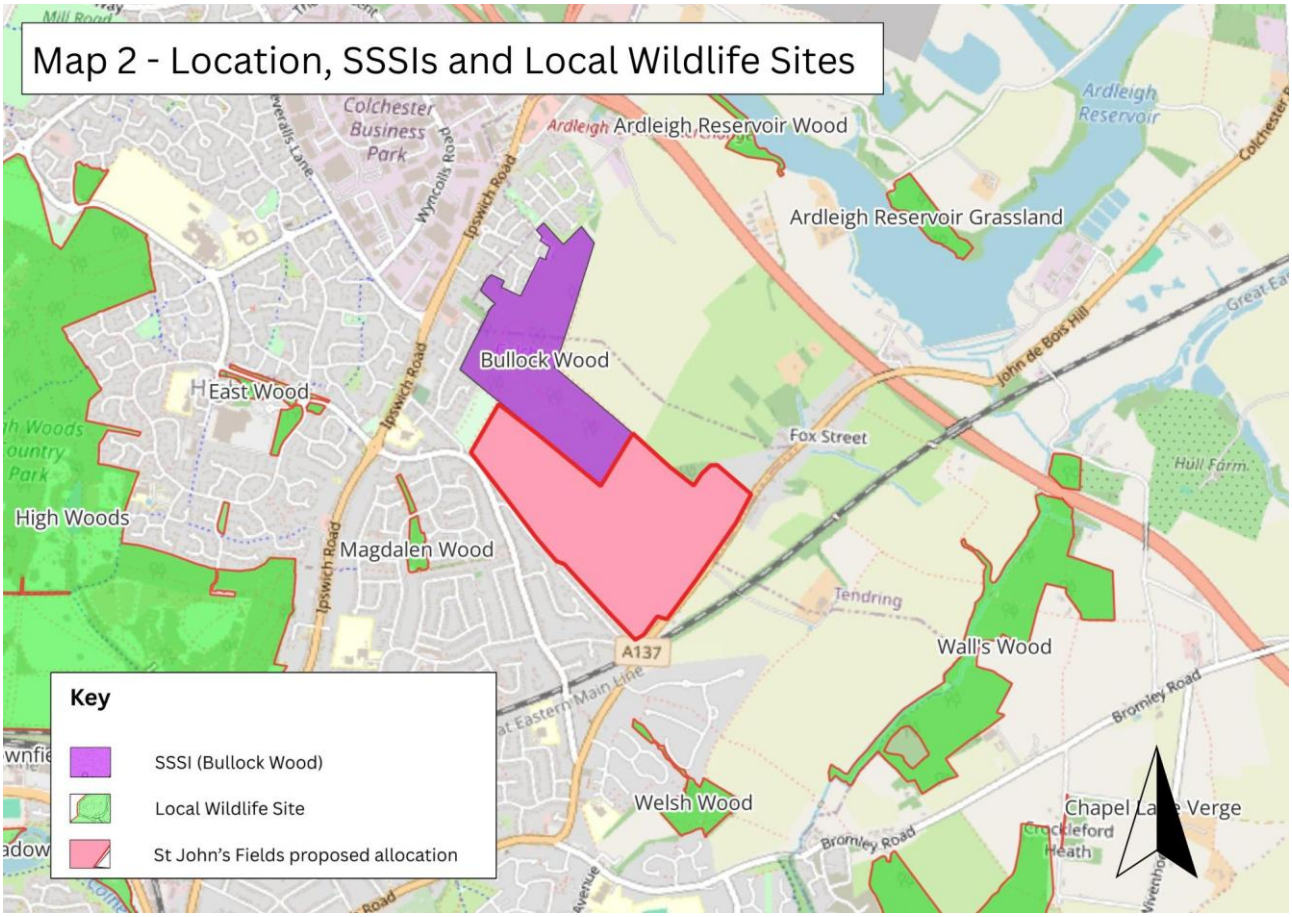
In accordance with **Circular 06/2005**, planning authorities must consult Natural England where operations are likely to damage an SSSI and decisions must be informed by sufficient ecological evidence. The 28-day statutory consultation window takes precedence over other planning timescales. Planning permission may serve as a "reasonable excuse" under section 28P of the Wildlife and Countryside Act only where all other required consents have been obtained.

Given these statutory safeguards – and the irreplaceability of ancient woodland - development proposals adjacent to Bullock Wood require careful ecological scrutiny, supported by adequate baseline data. See Map 1 and 2 for historical context and current location of Bullock Wood SSSI, nearby Local Wildlife Sites and the proposed allocation area.

Map 1 - 1874 Essex XXVII Ordnance Survey Map



Map 2 - Location, SSSIs and Local Wildlife Sites



3. ECOLOGICAL LANDSCAPE CONTEXT

St John's Fields sit on a gently undulating brickearth plateau forming the immediate rural setting of Bullock Wood SSSI. The plateau supports:

- hedgerow networks including mature and species-rich hedgerows;
- farmland margins and unmanaged boundary vegetation;
- an unlit rural nightscape;
- shallow drainage pathways leading into the woodland edges, and
- connectivity to an array of ancient and semi-natural woods and grassland, including:

    - **Welsh Wood LoWS** (600 m south-east)
    - **Wall's Wood LoWS** (880 m south-east)
    - **Churn Wood LoWS** (950 m south-east)
    - **Ardleigh Reservoir Grassland LoWS** (900 m north)
    - **Ardleigh Reservoir Wood LoWS** (1 km north)

Together these sites form a **woodland arc** across the northeast Colchester plateau. St John's Fields lie at the convergence of these ecological linkages and act as a connective zone enabling movement of bats, birds, invertebrates and small mammals between woodland blocks.

The rural character and absence of lighting preserve a continuous **dark corridor** network that is integral to nocturnal ecology within the SSSI and across the wider landscape. The plateau also ensures stable hydrological input into the SSSI's Alder and acid woodland communities.

3.1 Local Wildlife Sites – Woodland Connectivity

The LoWS network surrounding Bullock Wood supports complementary ancient woodland indicators (such as Bluebell, Moschatel, Wood Anemone and Yellow Archangel) and structural features typical of long-established coppice systems. Field boundaries and hedgerows provide dispersal routes between these sites. See Map 3 below.

St John's Fields lies around the centre of this network and thereby helps maintain ecological continuity between the SSSI and outlying woodland patches. Loss or urbanisation of the site would sever this connectivity, particularly for light-averse bat species and nocturnal invertebrates but also for other species such as breeding birds.

3.2 Hedgerows, Farmland and Dark Corridors

There are currently **over nine kilometres of hedgerows** between Bullock Wood SSSI to the north-west and Wall's Wood Local Wildlife Site to the south-east, of which approximately **5.5 kilometres** lie west of the railway line (east of Bullock Wood) and **four kilometres** east of the railway line. These consist of a mix of mature and diverse hedgerows and more recently planted ones. There are several additional kilometres of road bank and railway bank linear scrub and trees along the A12 and railway line. See Map 5 below.

The area therefore currently provides:

- hedgerow-based bat commuting routes;
- key open-foraging habitat for farmland birds;
- movement pathways for hedgehog, vole, shrew and reptile and amphibian species;
- an uninterrupted nocturnal environment, required by moths and other light-sensitive taxa.

Urbanisation would introduce physical barriers, artificial lighting and higher levels of disturbance, resulting in **permanent functional fragmentation** of these corridors.

3.3 Hydrological and Plateau Function

The brickearth and London Clay strata create a hydrological regime characterised by:

- shallow lateral water movement;
- perched seasonal water tables;
- slow infiltration into woodland margins.

Plateau Alder woodland such as Bullock Wood SSSI is particularly sensitive to these conditions. Groundworks, impermeable surfaces, drainage realignment and SuDS features may alter both the *direction* and *timing* of water entering the woodland, potentially resulting in edge drying, changes to fungal communities and long-term structural changes and decline.

3.4 Additional Ecological Functions of the Plateau Landscape

Beyond acting as a connective corridor and hydrological catchment for Bullock Wood, the plateau landscape provides several additional ecological functions that help maintain the integrity and resilience of the wider woodland network.

3.4.1 Ecological Permeability and Movement Across the Plateau

The open farmland, hedgerows, field margins and unlit spaces together allows species to move freely between Bullock Wood, Welsh Wood, Wall's Wood and the Ardleigh Reservoir habitats. This ecological permeability supports:

- movement of woodland-edge birds between feeding and nesting habitat;
- nocturnal dispersal of moths and invertebrates using linear features as navigational guides;
- small mammal and amphibian passage along ditch lines, hedgerows and grass margins.

Urbanisation typically replaces these semi-natural movement routes with roads, garden fences, housing blocks and lit paths. Even where green corridors are incorporated in development layouts, they rarely replicate the **width or darkness** of farmland corridors, resulting in reduced functional connectivity across the plateau.

3.4.2 Darkness as an Ecological Resource

Darkness forms part of the ecological character of the plateau and plays a key role in maintaining species movement and behaviour. The absence of lighting:

- supports **uninterrupted commuting routes** for light-averse bats;
- maintains foraging opportunities for nocturnal birds and mammals;
- provides suitable conditions for moths and other nocturnal invertebrates;
- preserves natural night-time humidity and temperature regimes along woodland edges.

The introduction of streetlights, domestic lighting and illuminated roads would create a step-change in nocturnal conditions. These effects extend beyond the illuminated footprint and are extremely difficult to reverse once development is in place.

3.4.3 Woodland-Edge Microclimate and Ecotone Integrity

The edge habitat and transitional zones between woodland and farmland – known as ecotones – are often biodiversity hotspots due to their structural complexity. These edges rely on:

- stable humidity and shading,
- low disturbance,
- intact ground vegetation,
- irregular scrub–tree structure.

Urbanisation typically leads to:

- increased disturbance along woodland edges;
- soil compaction and narrowing of the ecotone;
- shifts in flora towards competitive species (e.g. Nettle, Bramble);
- reduction in deadwood and natural regeneration niches beneficial to saproxylic invertebrates.

Although some of these processes are discussed in the context of Bullock Wood's sensitivity, their landscape-scale drivers – originating from changes at St John's Fields – are directly relevant here.

3.4.4 Low-Disturbance Conditions

The area comprising St John's Fields currently support low noise levels, absence of artificial lighting and limited human activity which allows:

- woodland-edge birds (Song Thrush, Blackcap, Dunnock) to forage freely,
- bats to commute along quiet hedgerows,
- hedgehogs and small mammals to move safely between habitat patches,
- ancient woodland invertebrates to persist in shaded, low-disturbance niches.

Conversion of the landscape to residential use would introduce persistent night-time noise, increased footfall and domestic activity. Such changes diminish the ecological buffering role that St John's Fields currently provides around Bullock Wood and the wider woodland arc.

4. ECOLOGICAL SENSITIVITY OF BULLOCK WOOD SSSI

4.1 Introduction

Bullock Wood SSSI is an ancient woodland of national importance, supporting rare woodland community types and long ecological continuity. Ancient woodland is recognised in the NPPF as **irreplaceable habitat**, and any development likely to affect it – directly or indirectly – requires careful assessment, supported by proportionate ecological evidence (Circular 06/2005; BS 42020).

Given the SSSI's modest size (23.3 ha), its dependence on plateau hydrology, and its rare assemblages, the woodland is highly sensitive to environmental changes occurring in the surrounding land, including those arising from nearby housing development.

4.2 Designated and Ecological Features of Bullock Wood

Bullock Wood's SSSI designation is based on:

- Lowland Hazel–Sessile Oak woodland with rare acid mor humus under Hazel coppice;
- Plateau Alder communities reliant on shallow groundwater;
- Ancient coppice-with-standards structure including Hazel, Sessile Oak, Sweet Chestnut, Rowan, Birch and Alder;
- Ancient woodland flora including as Wood Speedwell, Hairy Wood-rush and Three-nerved Sandwort;
- an uncommon Essex population of Water Avens (*Geum rivale*).

These features depend on **darkness**, **stable moisture**, **microclimatic stability** and **low disturbance levels**. Alterations to the woodland edge – through lighting, hydrology, trampling and/or nutrient enrichment – can significantly affect ground flora, fungi, invertebrates and woodland structure.

4.3 Hydrological Sensitivity

Hydrology is a key determinant of Bullock Wood's ecological integrity. The plateau and its brickearth soils deliver slow, diffuse moisture to the woodland edge, creating the conditions necessary for Plateau Alder and acid sessile oak communities.

Housing development neighbouring the SSSI woodland introduces:

- impermeable surfaces increasing run-off,
- cut-and-fill that alters shallow water pathways,
- piped drainage and SuDS that may concentrate or divert flows,
- changes in infiltration timing,
- potential reductions in edge soil moisture.

Such changes can cause 'edge drying', decline in Alder and ground flora, loss of fungal diversity and long-term woodland stress. Given the SSSI's reliance on lateral moisture movement, hydrological modification is considered **a high-risk impact that is difficult to mitigate**.

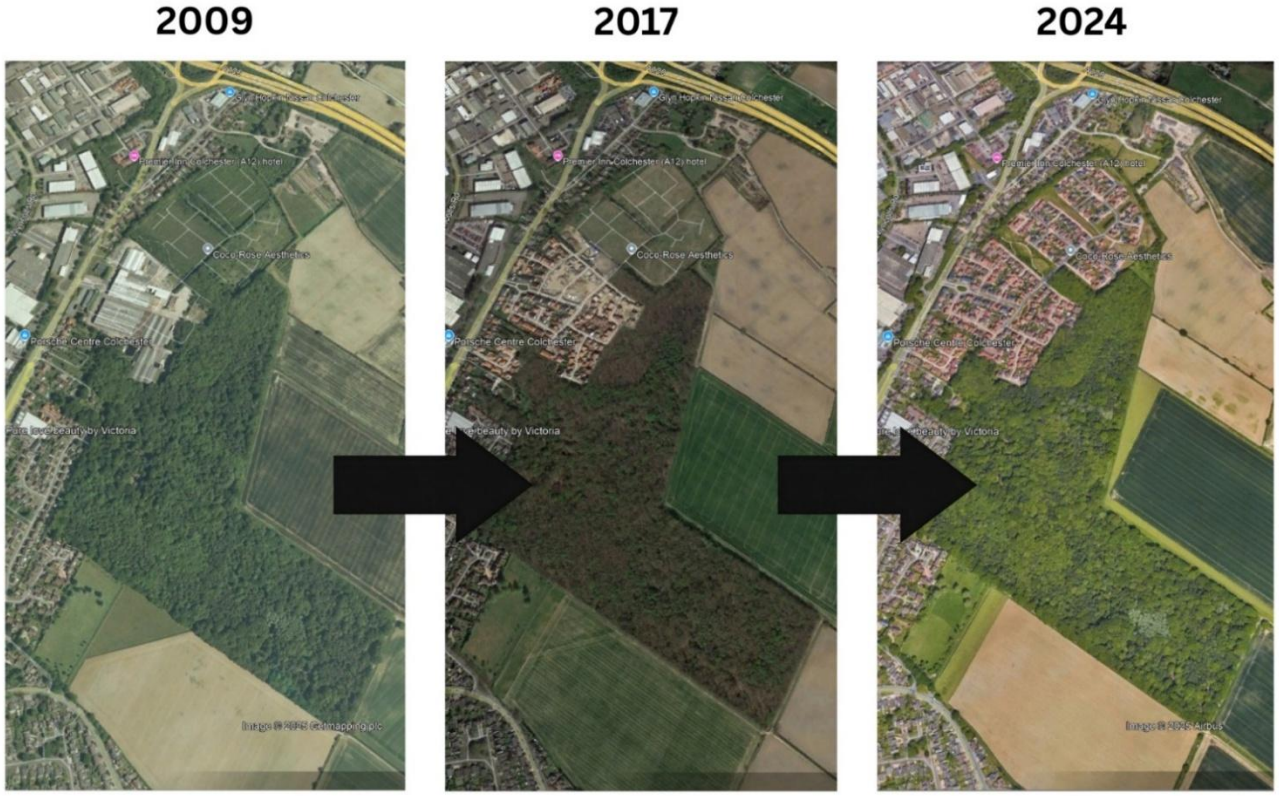
4.4 Recreational Pressure and Urban-Edge Impacts

Development around Bullock Wood over the last several decades has already reduced the extent of its surrounding buffer habitats. During the 20th century, residential expansion to the west encroached upon former woodland-edge and semi-natural habitats. Aerial photography indicates that further development between 2009 and 2024 along the north-eastern boundary – partly on land previously occupied by industrial uses – has resulted in approximately **1,150 metres of woodland edge** becoming directly adjacent to built development. This represents **40.7% of the total woodland perimeter**.

The current proposals would introduce development along a further **685 metres** of woodland boundary (or within 50 metres of it), increasing the total developed interface to **1,835 metres**, equivalent to **65.2% of Bullock Wood's 2,815-metre perimeter**. See Map 4 below.

This progressive enclosure substantially reduces the proportion of woodland edge buffered by semi-natural habitat and increases the likelihood of cumulative urban-edge effects, including disturbance, lighting, hydrological alteration and recreational pressure.

Map 4 - Development Around Bullock Wood SSSI 2009 - 2024



Small and mid-sized ancient woodlands frequently experience cumulative ecological deterioration when surrounded or approached closely by residential development.
Likely pressures include:

- **trampling** and soil compaction along woodland edges;
- **nutrient enrichment** from dog fouling;
- disturbance to nesting birds and woodland mammals;
- informal access routes, desire lines and cycling trails;
- **fire risk**, littering and garden waste tipping;
- spread of invasive or non-native garden species;
- increased levels of **domestic cat predation**.

Bullock Wood's woodland ground flora and sensitive Hazel–Oak communities make it particularly vulnerable to such pressures. Where urban-edge effects arise, the impacts tend to be:
(a) incremental;
(b) diffuse across the woodland margin; and
(c) extremely difficult to reverse.

4.5 Lighting, Darkness and Nocturnal Ecology

The rural nightscape surrounding Bullock Wood is integral to its ecological functioning.
Darkness supports:

- light-averse **bat species** (e.g., Myotis spp., Brown long-eared);
- moths and nocturnal **pollinating insects**;
- woodland birds reliant on natural night cycles;
- stable woodland-edge microclimates.

Residential development would introduce:

- street lighting;
- vehicle headlights;
- domestic security lights;
- illuminated footpaths and recreational areas.

Artificial light causes:

- fragmentation of bat commuting routes;
- suppression of light-sensitive species;
- disorientation and mortality of moths;

- altered predator–prey interactions;
- shifts in woodland-edge humidity and temperature.

This loss of darkness is **permanent once housing is built**, and lighting mitigation can only reduce, not eliminate, effects.

4.6 Evidence Requirements and Precautionary Approach

Under Circular 06/2005 and BS 42020, planning authorities must rely on robust ecological evidence before determining proposals affecting SSSI features. At the allocation stage, several key information gaps remain:

- year-round **bat activity** and connectivity surveys;
- complete **dormouse surveys** using full-season methods;
- **invertebrate surveys**, especially woodland-edge assemblages;
- **hydrological modelling** of plateau water movement;
- baseline **recreational use** and urban-edge pressure assessment;
- **hedgerow** composition and connectivity analysis;
- **wintering and breeding farmland bird** surveys.

Without this information, it is not possible to fully understand or quantify the risk of impacts to the SSSI or demonstrate that they can be mitigated.

4.7 Summary – Ecological Sensitivity of the SSSI

Bullock Wood is sensitive to:

- hydrological alteration;
- loss of darkness and nocturnal connectivity;
- nutrient enrichment and trampling;
- domestic predator pressure;
- fragmentation of ecological corridors;
- microclimatic changes at the woodland edge.

Given its small size, rare communities and reliance on the plateau's environmental conditions, Bullock Wood's ecological integrity is highly dependent on the character of the surrounding land. Many of the ecological functions provided by St John's Fields cannot be recreated elsewhere, nor can they be reinstated once lost.

5. KEY SPECIES CONSIDERATIONS

This section is a high-level desk-based review supported by the October site visit and draws on broad habitat observations and known species distributions.

5.1 Bats

The combination of mature hedgerows, treelines, woodland edges and rural darkness suggests high potential for a multi-species bat assemblage. Likely species include:

- Light-averse species: Brown long-eared (*Plecotus auritus*), Myotis spp.;
- Common species: Common and Soprano Pipistrelle;
- Commuting routes: linear hedgerows connecting Bullock Wood with Welsh Wood, Wall's Wood and the Salary Brook corridor.

Residential development introduces persistent lighting and disturbance, known to fragment bat commuting routes and alter foraging behaviour. Given the SSSI-adjacent location and the importance of dark corridors, the potential for significant impact cannot be assessed without full-season activity and static-detector surveys.

5.2 Birds

The site's arable fields and hedgerows likely support:

- **Farmland birds**: Such as Skylark, Yellowhammer, Linnet;
- **Woodland-edge species**: Such as Dunnock, Song Thrush, Blackcap;
- **Nocturnal species**: Such as Tawny Owl foraging along field margins.

Urbanisation typically results in habitat loss, noise disturbance, increased predator pressure and displacement of ground-nesting and edge-dependent species. Without targeted breeding and wintering bird surveys, the scale of impact cannot be quantified.

5.3 Invertebrates

Ancient woodland edges and farmland margins frequently support:

- diverse moth assemblages;
- saproxylic beetles using veteran trees and deadwood;
- pollinating insects dependent on hedgerows and field margins.

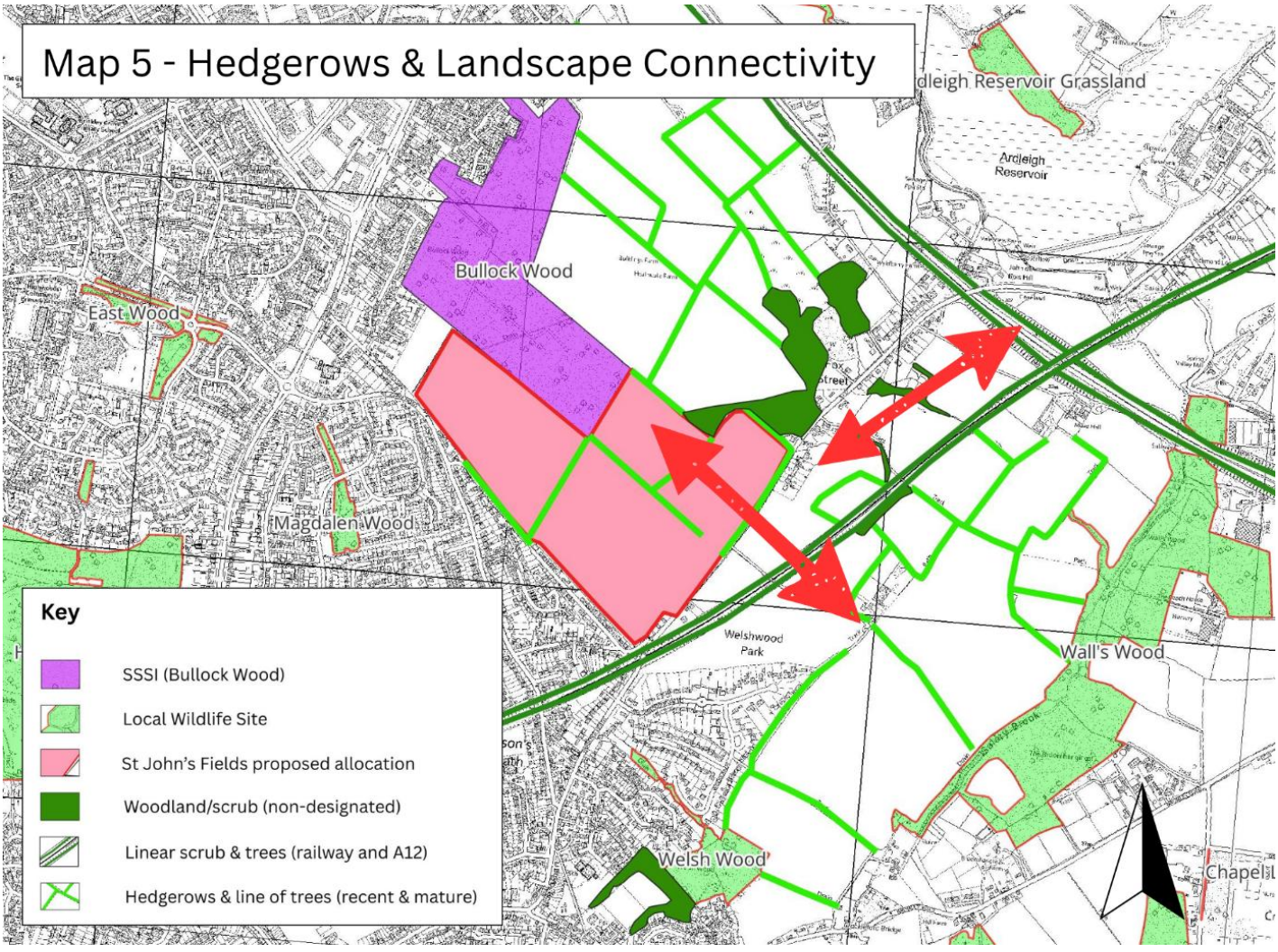
Artificial lighting is known to reduce moth abundance and disrupt pollination networks. Given the woodland-edge and dark-corridor context, invertebrate sensitivity is likely to be high. No surveys of woodland-edge invertebrates have been undertaken to date.

5.4 Mammals, Reptiles and Amphibians

Hedgerows and damp field edges provide connectivity for:

- hedgehogs, voles, shrews;
- small mammals moving between woodlands;
- amphibians using drainage features or wet margins.

Garden boundaries and lighting associated with residential development typically restrict such movements. No targeted surveys were conducted for this appraisal.



6. LEGISLATION AND POLICY CONTEXT

6.1 Wildlife and Countryside Act 1981 (as amended)

Bullock Wood is a **SSSI**, and operations likely to damage its features require consultation with Natural England under **section 28I**. Circular 06/2005 confirms that the 28-day consultation period takes precedence over planning timescales. Planning permission may constitute a "reasonable excuse" under section 28P only where all necessary consents have been obtained.

Given Bullock Wood's rare communities and sensitivity to hydrology, lighting and disturbance, the planning authority must ensure adequate information is available before determining effects on the SSSI.

6.2 Habitats Regulations (2017)

The presence of mature woodland, hedgerows and dark corridors suggests reasonable likelihood of **European Protected Species** (notably bats, possibly dormouse). Any development that risks affecting roosts or commuting behaviour may require a Habitats Regulations licence, which can only be considered where sufficient baseline information exists.

6.3 NERC Act 2006 – Section 40 Duty

Local authorities must conserve and enhance biodiversity, including Priority Habitats such as:

- Lowland Mixed Deciduous Woodland,
- Ancient Woodland,
- Hedgerows and field margins,
- Woodland-edge and dark-corridor networks.

The land around Bullock Wood supports multiple Priority Habitat functions even where not formally designated.

6.4 BS 42020 and Proportionate Evidence

BS 42020 requires planning decisions to be evidence-led. Where ecological information is incomplete, a precautionary approach is recommended. At this stage, key evidence gaps remain (hydrology, bats, dormice, connectivity, invertebrates). Without proportionate survey data, impacts cannot be reliably assessed.

7. BIODIVERSITY NET GAIN (BNG) CONSIDERATIONS

7.1 Limitations Adjacent to Irreplaceable Habitats

BNG cannot replace or replicate:

- ancient woodland soils or fungal communities;
- Hazel–Sessile Oak or Plateau Alder assemblages;
- dark-corridor functions;
- woodland hydrology.

Irreplaceable habitats are exempt from offsetting: losses or deterioration cannot be compensated by habitat creation elsewhere.

7.2 On-Site BNG Constraints

Delivering BNG within a residential masterplan adjacent to an ancient woodland requires:

- wide buffers protecting hydrology;
- retention of unlit corridors;
- avoidance of level changes;
- avoidance of SuDS discharge into woodland edges;
- protection of hedgerow connectivity.

Given competing spatial demands (roads, housing, drainage, open space), the feasibility of meaningful BNG on-site is limited.

7.3 Off-Site BNG Limitations

Off-site BNG may provide gains in other areas, but cannot maintain:

- connectivity between Bullock Wood and adjacent LoWS;
- the plateau's hydrological function;
- the dark landscape required by bats and moths;
- the movement pathways currently provided by St John's Fields.

The functional role of the land – arising from its position between multiple ancient woodlands – cannot be replicated elsewhere.

7.4 Summary of BNG Feasibility

Given:

- the SSSI's irreplaceability;
- the plateau's hydrological sensitivity;
- the importance of dark corridors;
- multiple Priority Habitat dependencies; and
- insufficient baseline data,

it is not currently possible to demonstrate that development could deliver a measurable net gain without significant residual impacts on SSSI functioning.

8. FINAL SUMMARY

St John's Fields form the **immediate ecological setting and connective zone** of Bullock Wood SSSI, which is the only designated SSSI woodland in Colchester District outside of the Roman River Valley. The land maintains:

- stable **hydrological inputs** to Plateau Alder and acid woodland communities;
- continuous **dark corridors** essential for bat and invertebrate movement;
- **semi-natural ecological permeability** between Bullock Wood, Welsh Wood, Wall's Wood and Ardleigh Reservoir Wood;
- buffering against **urban-edge pressures** such as lighting, trampling, nutrient enrichment and disturbance;
- a **landscape-scale linkage** supporting the wider woodland network.

Large-scale residential development would introduce permanent changes to darkness, hydrology, recreation levels and movement pathways. Many such impacts are **difficult or unrealistic to mitigate** where ancient woodland and SSSI features are concerned, and several key evidence gaps remain.

This review does not express a planning position but highlights the ecological sensitivities and uncertainties relevant to Bullock Wood SSSI and the plateau landscape. Further detailed field surveys and hydrological assessment would be required to determine whether impacts could be avoided or mitigated.

Photographs from survey visit on 8th October 2025

Appendix 5 – Oisin Kelly, BSc MArborA, MAE, Arboricultural Consultant's Report

Arborterra Ltd

Arboricultural Assessment

Of Land West of Harwich Road, Parsons Heath, CO4 3ES
Call for Site IDs: 10744 and 10256

Date: 1st December 2025
Project Ref: 1114

Arborterra Ltd (England & Wales, Company No. 100653051)
Registered Office: Saxon House, Moseley's Farm Business Centre, Fornham All Saints, Bury St. Edmunds, Suffolk, IP28 6JY
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1 INTRODUCTION

1.1 Background

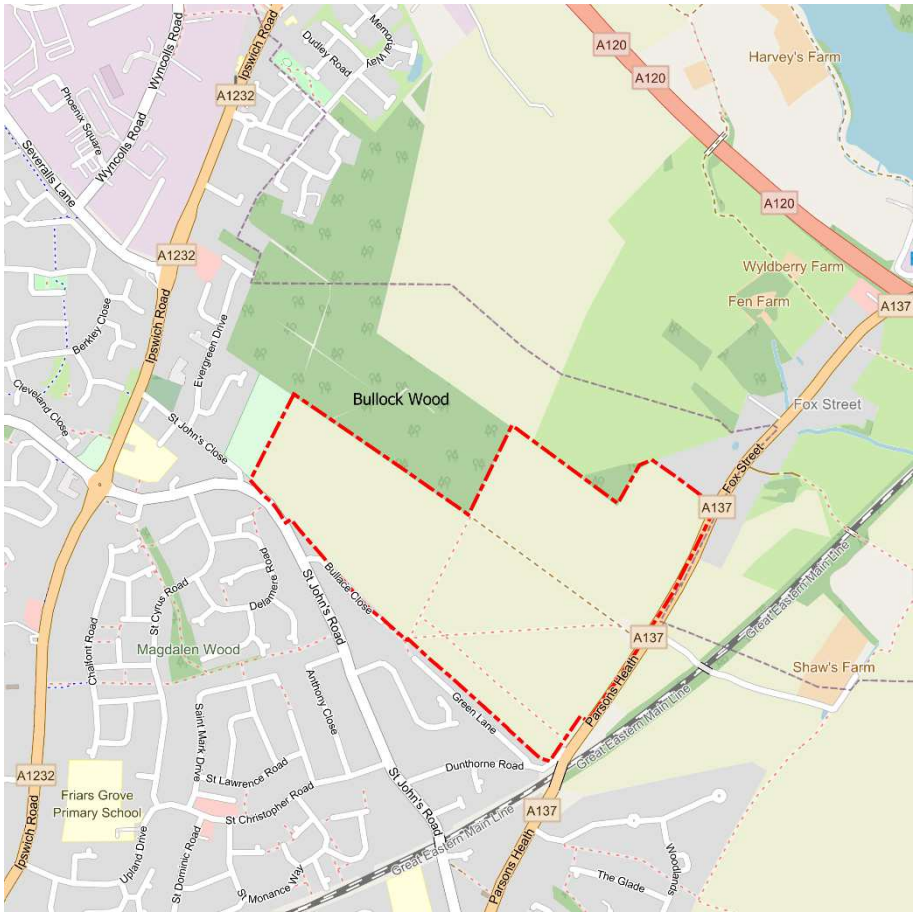
1.1.1 Arborterra is appointed to carry out a review of the inclusion of the land known locally as 'St John's Field' included in Policy PP9 of the Colchester City Council's 'Preferred Options Draft Local Plan' consultation. This report has been prepared on behalf of St John's Residents Association to support the residents' objections specifically in respect of the impact on the SSSI, trees and hedgerows.

1.1.2 Under site ID 10256 the site address is stated as 'Buildings Farm, St Johns Road, Colchester, CO4 0JQ'. It is stated to be 38.89ha in size and is proposed for residential development. Under site ID 10744 the site address is stated as 'Land at St Johns Farm Cottages, West of Harwich Road, Parsons Heath Colchester CO4 3ES'. It is stated to be 39.22 ha in size and is proposed for residential development and green infrastructure.

1.1.3 Given the size of the land (approximately 39ha), any residential development is likely to be in the range of 500 to 1500 units, or more.

1.1.4 The site is outlined red in the site location plan at Figure 1below.

Figure 1. Background mapping from Open Street Map under the Open Database License



1.2 Site Description

1.2.1 The Site comprises several agricultural fields, with various trees, hedges and ditches mostly situated along field boundaries. Public footpaths cross the southern section of the site. The site adjoins Bullock Wood to the north. Figure 2 below shows the site outline superimposed onto aerial imagery.

Figure 2. Imagery © 2025 Airbus, Maxar Technologies, Map Data © Google 2025.

2 ARBORICULTURAL CONSTRAINTS

2.1 Bullock Wood

2.1.1 Bullock Wood is a designated Site of Special Scientific Interest, ancient semi-natural woodland (ASNW) and is the subject of two Tree Preservation Orders. It is understood that Bullock Wood is jointly owned by Tendring District Council and the Patel family: exact details of ownership are unknown to the report's author and St John's Residents Association.

2.1.2 At the time of my survey there was no formal access to the wood. However, in places boundary fences were missing or in disrepair and it was clear that the wood is used informally by local residents.

2.1.3 It seems almost certain that adjacent residential development would have an adverse impact. Impacts are likely to include:

(i) Loss of connectivity to other green infrastructure assets
(ii) Soil compaction from increased visitor pressure, informal or otherwise
(iii) Changes to hydrology resulting from development
(iv) Pollution from run-off
(v) Wildlife disturbance due to increased noise, light, and vibration (the latter only likely during construction)
(vi) Pet disturbance: dog faeces causing increased fertility; dogs/cats disturbing wildlife
(vii) Encroachment of human activity, e.g. fly-tipping of household and or garden waste
(viii) Introduction of invasive species
(ix) Pressure for inappropriate management of trees in Bullock Wood resulting from overshadowing of residential property, risk or actual occurrence of tree-related subsidence, or safety concerns for persons or property within falling distance of trees in the wood.

2.1.4 The likelihood of harm is acknowledged in the LPA's "Summary of Sites Evidence Colchester Local Plan October 2025", in which it states

> *Biodiversity Protection and BNG study Harm – Borders woodland SSSI and likely to have an adverse impact on it*

Sites of Special Scientific Interest (SSSI)

2.1.5 Appendix 1 contains details of the SSSI citation, including a '*Description and Reasons for Notification*'. In summary it is an example of nationally rare woodland and woodland types. The sessile oak coppice component is locally rare. The understorey is dominated by coppiced hazel and Bullock Wood is the only site in eastern England where this species is known to form a mor humus. Water Avens *Geum rivale*, a very uncommon plant in Essex, has also been recorded.

2.1.6 The Site's condition is classed by Natural England as Favourable, i.e. the SSSI's habitats and features are in a healthy state and are being conserved by appropriate management.

2.1.7 Circular 06/2005 sets out the legislative framework and obligations of a local planning authority (LPA) in relation to SSSI's. In short, section 28 of the Wildlife and Countryside Act

1981 (as amended by the Countryside and Rights of Way Act 2000) sets out provisions for the notification, protection and management of SSSIs. LPA's have a duty to take reasonable steps to conserve and enhance SSSIs. Local development documents must be prepared in accordance with this duty. (Subsequent individual planning decisions must also take account of this duty.)

2.1.8 The LPA will need to decide what it considers are 'reasonable steps' to be taken and in doing so may wish to consult Natural England. For this purpose Natural England (NE) use 'SSSI Impact Risk Zones' to determine whether LPAs should consult NE or rely on their standing advice. There is no fixed buffer distance for an impact zone, rather their size is determined by features of the SSSI. Each SSSI will have several impact zones. And in general the larger zones have a higher threshold before direct consultation with NE is recommended. In this instance, the entire site is covered by SSSI Impact Zones, all of which indicate direct consultation with NE is necessary due to the scale of the development.

2.1.9 In deciding whether to 'allocate the site' or otherwise support its development the LPA must also take account of National Planning Policy Framework (NPPF) [1]. Specifically, section 188 states

> *Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.*

2.1.10 In relation to this site that means, inter alia:

- Consider allocating alternative land that would have a lesser impact or impact land of lower hierarchical status, i.e. are there other sites likely to have a lesser adverse effect on an SSSI, or adversely affect sites of lesser importance (an SSSI is a nationally important designation).
- Take a strategic approach to maintaining and enhancing networks of green infrastructure. Development of the site poses a real risk of causing deterioration of the SSSI and its functional links to other green infrastructures assets. Again, this means preference should be given to other sites that do not pose a risk to sites of national importance. Development of green infrastructure alone would meet this guidance, but residential development on the scale proposed would almost certainly not.

2.1.11 Section 193 of the NPPF relates to determining planning applications. However, the strategic allocation of the site for residential development with the Local Plan would essentially 'tilt' the balance in favour of residential development with its consequential impacts, which cannot be fully mitigated. As such, consideration of section 193 of the NPPF is also appropriate at this stage. Section 193 states:

[1] as last updated on 12/12/2024

> *193. When determining planning applications, local planning authorities should apply the following principles:*
>
> *(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
>
> *(b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;…*

2.1.12 Section 193(a) indicates preference should be given to allocation of alternative sites that would have a lesser impact on biodiversity. Section 193(b) indicates if any adverse effect is likely, and it is, then development of the site should not normally be permitted.

2.1.13 The LPAs Strategic Land Availability Assessment (SLAA) of the site[2] uses a traffic light system of red, amber, green against various criteria. One such criterion asks: *"Is the site partially located within any of the following designations? Area of Outstanding Natural Beauty (AONB), Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA), Ancient Woodlands, RAMSAR"*. Against this criterion the assessment states: "*Green – site is not located within any designations listed*". This assessment is surprising, and seems to be in conflict with the LPA's duties under the Wildlife and Countryside Act, and is contrary to NPPF sections 188 and 193, and Governmental Guidance at paragraph 61a of Circular 06/2005, which states:

> *"The Government expects all section 28G authorities, including planning authorities, to:*
>
> *a) apply strict tests when carrying out any functions within or affecting SSSIs, to ensure that they avoid or at least minimise adverse effects"*

2.1.14 The Council's assessment should clearly have taken into account potential impacts on adjacent sites, not just within the redline boundary itself. It is not sufficient to leave this assessment to application stage.

Ancient Semi-natural Woodland

2.1.15 Ancient Semi-natural Woodland (ASNW) is defined as "*any area that's been wooded continuously since at least 1600 AD*" (Guidance Ancient woodland, ancient trees and veteran trees: advice for making planning decisions).

2.1.16 Bullock Wood has a documented history to before 1242. For instance see "Colchester Borough Historic Environment Characterisation Project" (2009), which states:

[2] "Strategic Land Availability Assessment (SLAA): Site Assessments Report Stage 2" (February 2025),

> *In the parish of Greenstead, St John's abbey enclosed c. 220 acres of ancient common and the abbot planted Sowen wood before 1242 which survives (now known as Bullock wood) as one of the earliest examples of a woodland plantation in the country.*

2.1.17 The designation is also confirmed within the SSSI citation. Bullock Wood also appears on the Ancient Woodland Inventory[3] (Unique Identifier Number: ESS-2031).

2.1.18 ASNW is recognised within the National Planning Policy Framework (NPPF)[4] as an irreplaceable habitat. Section 193, quoted at 2.1.11 above, continues to state:

> *(c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and …*

2.1.19 This National Policy is echoed in the LPAs adopted Local Plan – see ENV1.

2.1.20 The LPA's own assessment is that harm is likely to arise as a result of the development of the site: see 2.1.3 and 2.1.4 above.

2.1.21 In the event that the site is allocated, then Natural England's (NE's) Standing Advice is for the imposition of a buffer zone around the ASNW. NE recommend a minimum buffer zone of 15m, but go on to state:

> *"…larger buffer zones are more likely to be needed if the surrounding area is:*
>
> - *less densely wooded*
> - *close to residential areas*
> - *steeply sloped"*

2.1.22 The first two of these bulleted items apply in this instance. In addition, the size of the development and number of new houses also suggests a larger buffer zone would be appropriate in this instance.

2.1.23 'Planning for Ancient Woodland – Planners Manual for Ancient Woodland and Veteran Trees' (Woodland Trust, 2017) provides examples of cases where 50m and 100m buffers were applied: respectively at (1) Ruffley Wood (Kings Lynn and West Norfolk Council Site Allocations and Development Management Policies 2016); and (2) for the Ashton Park Urban Extension (The Wiltshire Core Strategy25, adopted in January 2015). These decisions were informed by an assessment of impacts of development on the ancient woodland. No such assessment has been carried out in this instance.

2.1.24 If the site is to be allocated for development, it would be appropriate therefore to specifically state in the application that a buffer zone of up to 100m will apply subject to site assessment.

[3] Ancient Woodland - Revised (England) - Completed Counties
[4] as last updated on 12/12/2024

Tree Preservation Order

2.1.25 There are two Tree Preservation Orders (TPOs) that apply to Bullock Wood. In general terms Tree Preservation Orders are made to protect significant public amenity. However, there are no Local Plan policies that relate specifically to Tree Preservation Orders, and all considerations are covered under matters relating to the SSSI and ASNW above.

2.2 Trees and Hedgerows

2.2.1 The site itself contains various trees and hedgerows that are mostly situated around field boundaries. Arborterra has undertaken a preliminary walkover survey and did not identify any veteran trees. However, the definitions of veteran tree vary significantly, with the definition for ecologists enshrined in Bio-diversity Net Gain (BNG) legislation setting a markedly lower bar that that used by Arboriculturalists. As such, there is a possibility that an ecologist may consider certain trees qualify as veterans.

2.2.2 Regardless, whilst veteran or ancient trees may act as a constraint on development, it seems unlikely to me that they would justify not 'allocating' the site.

2.2.3 In the event that the site was allocated, then the trees and hedgerows on site are a material consideration in relation to the form of that development. Whilst Arborterra has not carried out a detailed survey, Appendix 2 contains a plan indicating the location of the principal trees and hedgerows, along with other constraints.

2.2.4 The hedges are subject to protection by the Hedgerow Regulations 1997. Essentially, all hedgerows subject to certain exceptions have blanket protection and cannot be removed without first notifying the LPA. The LPA then assesses whether the hedgerows are 'Important', and if so would normally serve a 'Hedgerow Retention Notice'. Important hedgerows have a higher status in planning policy than hedgerows that are not 'Important'. Importance is assessed by a variety of criteria, which relate to:

- historic boundaries (pre-1850 parish or township, pre-1600 estates or manors, pre-Inclosure Acts field systems);
- archaeological features, sites or monuments;
- protected species or habitats sites; or
- species diversity

2.2.5 Arborterra has not assessed these criteria in detail, but in relation to diversity of woody species (criterion 7 of SCHEDULE 1 of the Hedgerow Regulations) the hedges did not appear to be species rich. It is stressed that the hedgerows may however qualify as 'Important' under other criteria that have not been assessed.

2.3 Other

2.3.1 Arborterra has not undertaken a Landscape Assessment. However, it is noted that the application sites closely matches the Key Characteristics of Landscape Typology B7 of

Colchester Landscape Character Assessment (Colchester City Council, 2024) ('the LCA'). Key characteristics include:

- A predominantly arable landscape
- Scattered woodland cover, including Ancient Woodland
- Good levels of public access via a network of public rights of way
- Historic settlement pattern of dispersed farmsteads and cottages

2.3.2 The LCA states:

> *The overall strategy for the Langham Farmland Plateau LCA is to conserve and enhance the rural landscape… Visually intrusive and incongruous development should be avoided*

2.3.3 The LCA recommends landscape management should:

> *Seek to prevent further loss or decline in the quality of remaining boundary hedgerows and encourage their restoration/reinstatement…*
>
> *Protect and enhance valued habitats, including Ancient Woodland habitat at Kiln Wood, Birch Wood, and Bullock Wood. Seek to improve linkages between scattered woodland blocks, whilst maintaining open views to the north.*

2.3.4 Allocation of the Site for residential development is at odds with the recommendations of the LPAs' own Landscape Character Appraisal.

3 CONCLUSIONS

3.1.1 Arborterra is appointed to carry out a review of the inclusion of the land known locally as 'St John's Field' included in Policy PP9 of the Colchester City Council's 'Preferred Options Draft Local Plan' consultation. This report has been prepared on behalf of St John's Residents Association to support the residents' objections specifically in respect of the impact on the SSSI, trees and hedgerows.

3.1.2 The Site is comprised of several agricultural fields. It contains with various trees, hedges and ditches mostly situated along field boundaries. Public footpaths cross the southern section of the site. The site adjoins Bullock Wood to the north. Bullock Wood is a Site of Special Scientific Interest (SSSI), an ancient semi-natural woodland (ASNW) and is protected by two Tree Preservation Orders.

3.1.3 Given the size of the land (approximately 39ha), any residential development is likely to be in the range of 500 to 1500 units, or more. A development of this size will almost certainly have adverse impacts on the SSSI and ANSW, as acknowledged in the LPA's evidence base.

3.1.4 The LPA's SLAA of the site uses a traffic light system of red, amber, green against various criteria. The criterion relating to SSSI's is framed to only consider SSSI's within proposed site boundaries. This is an insufficient test in that the LPA's duties under the Wildlife and Countryside Act, and NPPF sections 188 and 193 require consideration of impacts on adjacent sites, i.e. in this instance Bullock Wood. Similarly, the LPA's SLAA has not considered adequately impacts on the ASNW designation of Bullock Wood.

3.1.5 If the site is to be allocated for development, it would be appropriate therefore to specifically state in the allocation that buffer zones in respect of the SSSI and ANSW will apply, with the size of buffer zone to be determined based on site assessment.

3.1.6 Although not an Arboricultural issue, the report also notes that development of the site appears to be in conflict with the recommendations of the LPA's Landscape Character Assessment.

3.1.7 The site itself contains various trees and hedgerows that are mostly situated around field boundaries. In the event that the site was allocated, then the trees and hedgerows on site are a material consideration in relation to the form of that development. Whilst Arborterra has not carried out a detailed survey, Appendix 2 contains a plan indicating the location of the principal trees and hedgerows, along with other constraints.

-- END --

Appendix 1
SSSI Citation document

File ref:

County: **Essex** **Site Name: Bullock Wood**

District: **Colchester and Tendring**

Status: Site of Special Scientific Interest (SSSI) notified under Section 28 of the Wildlife and Countryside Act 1981

Local Planning Authority: Colchester Borough Council and Tendring District Council

National Grid Reference: TM 019277 **Area:** 23.3 (ha) 57.57 (ac)

Ordnance Survey Sheet 1: 50 000: 168 **1: 10 000:** TM 02 NW

Date Notified (Under 1949 Act): - **Date of Last Revision:** -

Date Notified (Under 1981 Act): 1985 **Date of Last Revision:** -

Other Information:

This is a new site.

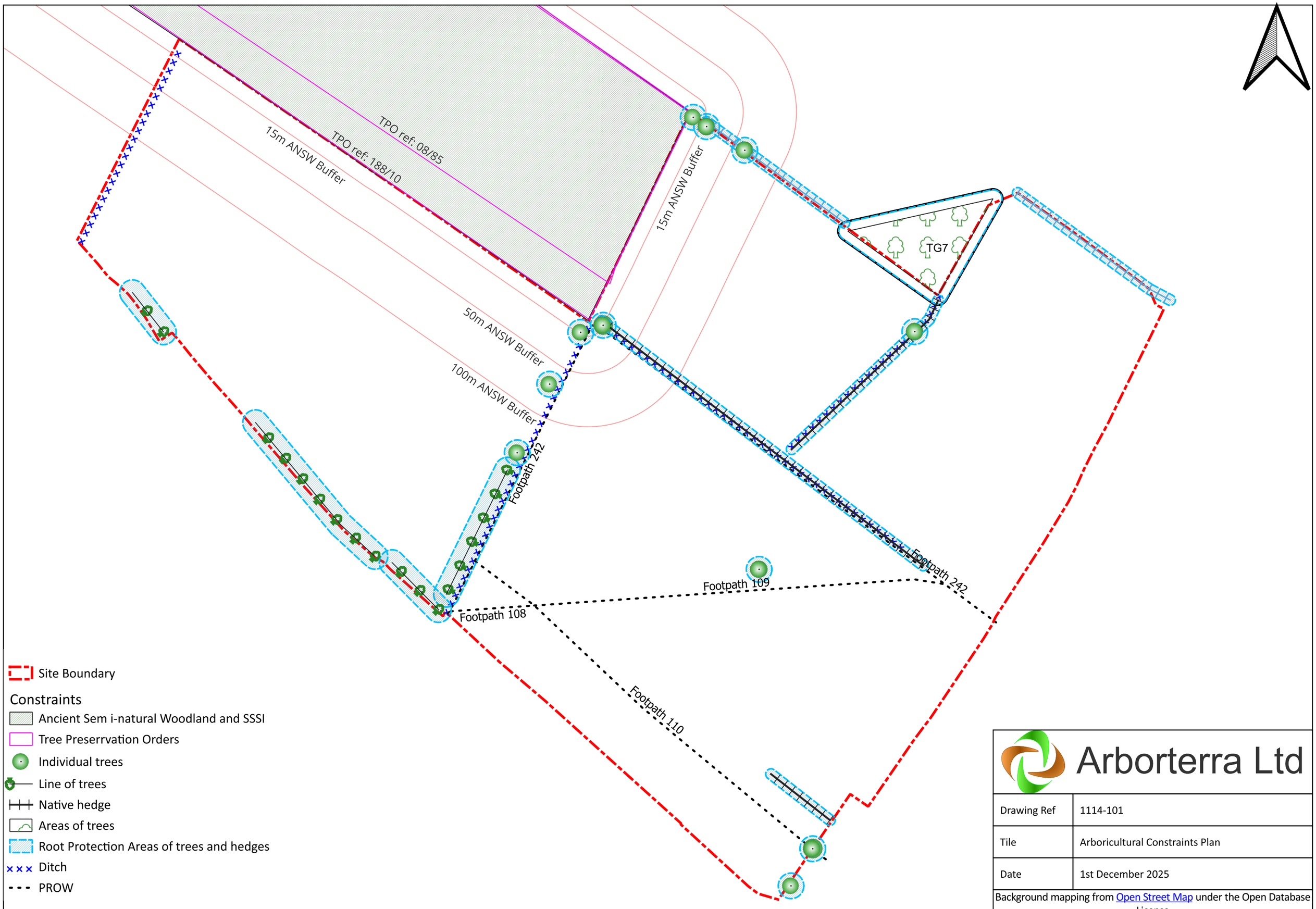
Description and Reasons for Notification:

Bullock Wood is an ancient coppice-with-standards woodland with a wide range of tree species. The principal woodland type is the nationally rare Lowland Hazel-Sessile Oak woodland type modified in places by the presence of Sweet Chestnut *Castanea sativa*. The wood is situated on an almost level plateau with acidic soils developed over Brickearth, and lies within the former Royal Forest of Kingswoode.

The wood also contains the nationally rare Plateau Alder and Acid Sessile Oak-Hazel-Ash woodland types. The canopy is varied, some areas being dominated by Pedunculate and Sessile Oak *Quercus robur* and *Q. petraea* and others by Sweet Chestnut, with varying proportions of Ash *Fraxinus excelsior*, Rowan *Sorbus aucuparia*, Birch *Betula* and isolated stands of Alder *Alnus glutinosa*. The Sessile Oak coppice is of particular interest and has been recorded from very few other sites in Essex. The understorey is dominated by coppiced Hazel *Corylus avellana* and Bullock Wood is the only site in eastern England where this species is known to form a mor humus.

The ground flora is dominated by Bramble *Rubus sp.* with abundant Bracken *Pteridium aquilinum*. The flora is typical of acid woodland soils and includes Bugle *Ajuga reptans*, Wood Sage *Teucrium scorodonia*, Foxglove *Digitalis purpurea*, Three-nerved Sandwort *Moehringia trinervia*, Wood Speedwell *Veronica montana*, Bluebell *Hyacinthoides non-scripta* and Hairy Wood-rush *Luzula pilosa*. Water Avens *Geum rivale*, a very uncommon plant in Essex, has also been recorded.

Appendix 2
Site Constraints Plan



Arborterra Ltd

Drawing Ref	1114-101
Tile	Arboricultural Constraints Plan
Date	1st December 2025

Arborterra Ltd

info@arborterra.co.uk
www.arborterra.co.uk

Appendix 6 – Residents' Footfall Survey (Sept), showing extent of use of footpaths 242, 110 and 109.

ST JOHN'S RESIDENTS ASSOCIATION

Footfall survey September 2025

Public Footpaths 242, 110 and 109 Colchester

Location of data collection

Conducted by:

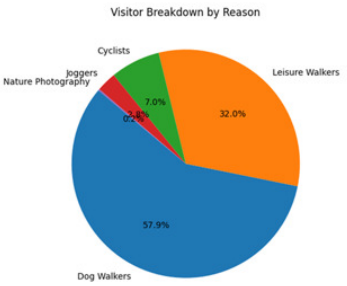
Local volunteers across 31 x one-hour observation slots

Total Visitors Recorded:

497 people visited the fields during the 7-day survey.

Why People Visited

Reason for Visit	Number of Visitors	Percentage
Dog Walkers	288	58%
Leisure Walkers	159	32%
Cyclists	35	7%
Joggers	14	3%
Nature Photography	1	<1%



Insight: Dog walking was the most popular activity, followed by leisure walking.

❑ 🌞 Busiest Day: Monday, 8th September

- Visitors: **115**
- Weather: Sunny and pleasant
- **Peak Time Slot: 5:30pm – 6:30pm (37 visitors)**

❑ ⏰ Peak Time Slots Across the Week

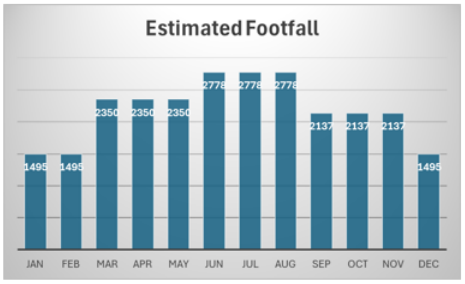
Date	Time Slot	Visitors
8th Sept	5:30pm – 6:30pm	37
9th Sept	5:30pm – 6:30pm	47
10th Sept	6:30pm – 7:30pm	15
11th Sept	7:30am – 8:30am	19
12th Sept	7:30am – 8:30am	16
13th Sept	8:00am – 9:00am	24
14th Sept	8:00am – 9:00am	24

Observation: Weekday evenings were busiest, while weekend mornings saw more activity.

❑ 📈 Estimated Monthly Footfall (Seasonally Adjusted)

Key Insights:

- Summer (June–August): Highest footfall due to longer daylight and better weather.
- Spring (March–May): Strong activity, especially in May.
- Winter (December–February): Lowest footfall due to shorter days and colder conditions.



Month	Estimated Footfall
Jan	1495
Feb	1495
Mar	2350
Apr	2350
May	2350
Jun	2778
Jul	2778
Aug	2778
Sep	2137
Oct	2137
Nov	2137
Dec	1495

26,280 Estimated Annual Footfall

Wildlife seen duration surveys

Birds
- Tree creeper
- Chiff Chaff
- Long tailed tits large flock
- Robin
- Magpie
- Great tit, Blue tit, Coal tit
- Common crow
- Green Woodpecker
- Wood Pidgeon
- Great spotted woodpecker
- Kestrel
- Woodpecker
- Greenfinch
- Collared dove Flock of Geese

Other Wildlife
Muntjac Deer
Squirrels

Comments from local Walkers

- Dog walker from Parsons Heath commented that the interconnecting fields make this a safe and pleasant place to walk. Otherwise, would get in the car and drive to Highwoods

- Daily walkers enjoy watching the bird life
- Walker have walking here for decades and now brig their grandchildren here

- Therapeutic value of walks before and after work.
- Local man said he is looking to move because of the potential development

Seasonal Variation Note
It is important to acknowledge that the timing of this survey, conducted in early September, may not fully reflect the seasonal diversity of birdlife typically present in the area. Certain species, such as skylarks, are known to exhibit more prominent activity during their breeding season in spring and early summer, when their distinctive song-flights are a key feature of St Johns Fields. As a result, their presence may be underrepresented in this dataset. Future surveys conducted across multiple seasons would provide a more comprehensive understanding of avian biodiversity and habitat use throughout the year.

CONCLUSION OF SURVEY

THE FIELDS NEAR BULLACE WOODS ARE A VALUED LOCAL GREEN SPACE, ESPECIALLY FOR DOG WALKERS AND LEISURE WALKERS. THE SURVEY SHOWS CLEAR PATTERNS IN USAGE BASED ON TIME OF DAY AND SEASON, WITH EARLY MORNINGS AND EVENINGS BEING THE MOST POPULAR. WEATHER AND DAYLIGHT HOURS SIGNIFICANTLY INFLUENCE FOOTFALL.

Appendix 7 – Residents' Survey regarding concerns of the development (Nov 2024).

ST JOHN'S RESIDENTS ASSOCIATION

Residents Survey results November 2025

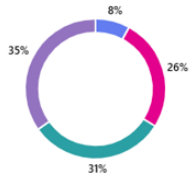
Introduction
A survey was undertaken to ascertain the views of the local population in St John's, Parsons Heath and vicinity likely to be impacted the proposed development of 2000 homes in East Colchester. The purpose of the survey was to:
1) Ascertain the issues most important to local residents in respect of the impact of any development
2) The method by which residents would like to be kept informed by the St John's Residents Association and the campaign team.

The survey accessible via Microsoft Forms was shared on the St John's Fields Action Group Facebook page, website and sent out via email.

Results
There were 224 responses received. The results are summarised below:

1. **How informed do you feel about Colchester City Council's Local Plan, and its potential implications for your neighbourhood?**

Very informed	18
Somewhat informed	59
Not very informed	71
Not at all informed	79

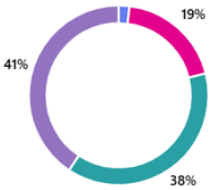


2. **When you consider Colchester's Local Plan, and its proposed areas for housing development, what are the issues most important to you? (Please use the arrows on the right to move the options with the most important at the top).**

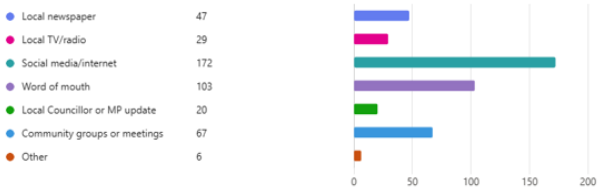
1	Local service capacity, e.g. hospitals, dentists, schools etc.
2	Impact of roads and transportation
3	Loss of community green areas
4	Impact on environment/ecology
5	Other

3. How informed do you feel about local decisions and council activities?

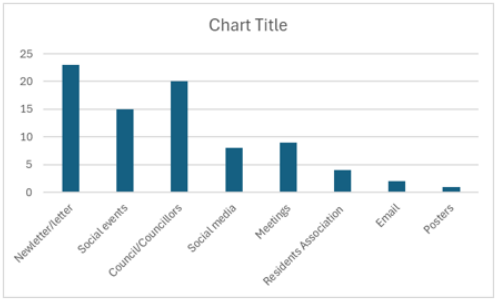
Very informed	4
Somewhat informed	39
Not very informed	78
Not at all informed	83



4. How do you usually find out about local news or issues?



5. What would make you feel more connected to your community?



Selection of comments

"To feel listened to by the council in regards to concerns and loss of green space"

"This group has made me feel more connected already"

"You are all doing such a wonderful job"

"Continuation of the residents group and further fundraising event".

"If the place where most of us walk our dogs wasn't being taken away"

"Maybe face to face meetings"

"More transparent information from the council"

"More leaflets on what's going on going through our doors"

"The large Green area makes the community feel connected as there are many residents who walk in this area every day multiple times a day, and it is a way in which many elderly residents are able to connect with others. Please don't take this away from them".

"As we will be directly impacted by these homes being built on St John's Fields we should have had a letter through the door explaining the intentions and planning".

"I mostly see your Facebook posts but if it wasn't too labour intensive perhaps an emailed newsletter weekly fortnightly or whenever there are important updates. I appreciate you are all volunteers and give your time freely, and I'm very grateful we have you fighting for our community. Thank you".

"The 'housing crisis' is a scam. The words 'affordable', 'garden community' is all rhetoric. Areas like Tollgate/Stanway/Eight Ash Green = planning disaster, not to appease our LOCAL shortage of homes for people who actually need a home. Planning departments/developers/the Government have and are ruining everything. It's too late to repair. There will be a backlash, I've seen the [redacted] sustainability assessments for St John's & Welshwood".

"To be involved in community discussions around these issues - this end of town does not have the infrastructure to deal with MORE new housing with no drs , schools etc able to cope".

"Having a council that makes decisions based on what's good for COMMUNITY".

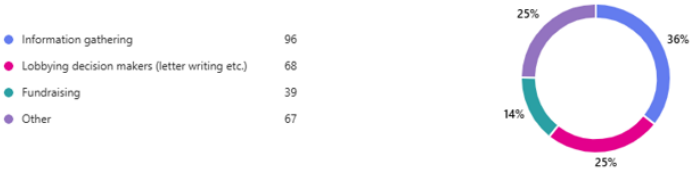
"A monthly newsletter to every household letting us know what is going on and being planned for our community".

"Councillors who really care about the residents who are already here would help. The current lot seem hellbent on destroying the services facilities and infrastructure to accommodate thousands more people. A complete and utter disgrace".

"Social media groups, the new St John's Residents Facebook group has been very useful".

5. How would you prefer to be contacted by St John's Fields Action Group/Residents Association or share your views in the future?

7. What support could you provide to our campaign? (Please tick all that apply)



8. Any other thoughts or ideas you would like to share?

"A traffic survey of St. John's Road at peak times at both ends (the Harwich Road end and Ipswich Road end) to capture volumes and photograph queues would offer some statistical weight to the anecdotal evidence being shared".

"A leaflet dropped to every household in our area letting them know of the council's proposals to build up to 2000 new builds and asking them to get involved if not already so with donations to fight the plans and partition signing and objections etc".

"I have lived in Highwoods for 5 years, and St John's fields have played a huge part in making these enjoyable. From walks during lockdown to the present day - having suitable long dog walks is very important as i have a reactive dog, who struggles with busy roads and the busyness of highwoods. It is important not only for the dogs, but for my own mental health".

"In terms of what is really the most important to me - we moved here 3 years ago when I was pregnant with our first baby (we now have 2 children), and the biggest selling point was the fields. I was so happy to think my children would be growing up in this beautiful area of countryside. They are the

number one reason for me, but being honest and selfish about it I'm also disappointed that it will certainly have a negative impact on the value of our house on Green Lane".

"Make it known throughout Essex the situation. Not just local. The decision will affect many other parts of Essex".

"Appreciate the valuable work that the campaign team are completing, and will continue to support fundraising events"

"More opportunity to talk with action group face to face, regular drop ins or public chats/meets, community drop in somewhere".

"Maybe re introduce a subscription to be part of the St John's resident s association"

"The impact on this area if this is approved will be catastrophic. Having lived in this area since 1988 the amount of traffic now is just crazy. My asthma is already much worse due to the already high level of traffic on St John's Road. If the A12 has an incident, the traffic (most days) all comes this way to cut through Colchester".

"I think Colchester should be focused on developed brown field sites over green spaces".

"Please do not let this build happen, I have seen so much wild life over there and if houses are built it will be chaos on the local area".

"Stop taking away our green spaces! We need them! Colchester council cannot adequately support the houses that are already here, the city centre is a shambles and shops are closing left right and centre! Look after what's here first, fix what's broken here already, utilise empty properties to help support affordable housing - concentrate on making Colchester a nice place to live for its current residents before trying to build anything else"

"Why do planners always go for the easy options when it comes to building. It's so much easier to build on good agricultural land than on brown field sites, cheaper too - but we need to think about the scarcity of our resources and how we re-use sites that have become redundant".

"2000 in the local area would be ludicrous! The schools roads and area cannot cope with it! We do not need another 2000 in our community!"

"Stop ruining the town! Do not build more houses without improvements to infrastructure"

"The growing insanity of building on our best agricultural land and destroying what little habitat we have is insane - build up not out".

"The fields are such beautiful spaces. The local schools and nhs services would not be able to cope with an additional 2,000 houses when they are already struggling now. We can't lose all of our beautiful nature to yet more houses"

"It is important that there is open spaces for people to enjoy space, peace and nature".