



The 2008 Angora Bare Trusts' Representations to the Colchester City Council Local Plan (Preferred Options Regulation 18 Consultation)

Date

January 2026 (V1)

Prepared By

Emma Thompson BA (Hons) MSc MRTPI | Associate

Reviewed By

Kennedy Durrant BA (Hons) MA MRTPI | Associate

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1. Introduction

- 1.1 These representations to the Colchester City Council Local Plan Preferred Options (Regulation 18) are made on behalf of our client, The 2008 Angora Bare Trusts. This representation document provides comments on proposed place policy PP29: Land East of School Road, Copford and the objectives within the Sustainability Appraisal.
- 1.2 These representations are separate to those made on behalf of the landowner to the north (represented by Welbeck Land) and Copford with Easthorpe Parish Council, pertaining to the land owned by our client which is shown in Figure 1 below. Nevertheless, these representations broadly align with the representations submitted separately by Welbeck Land for the draft allocation Land East of School Road, Copford.

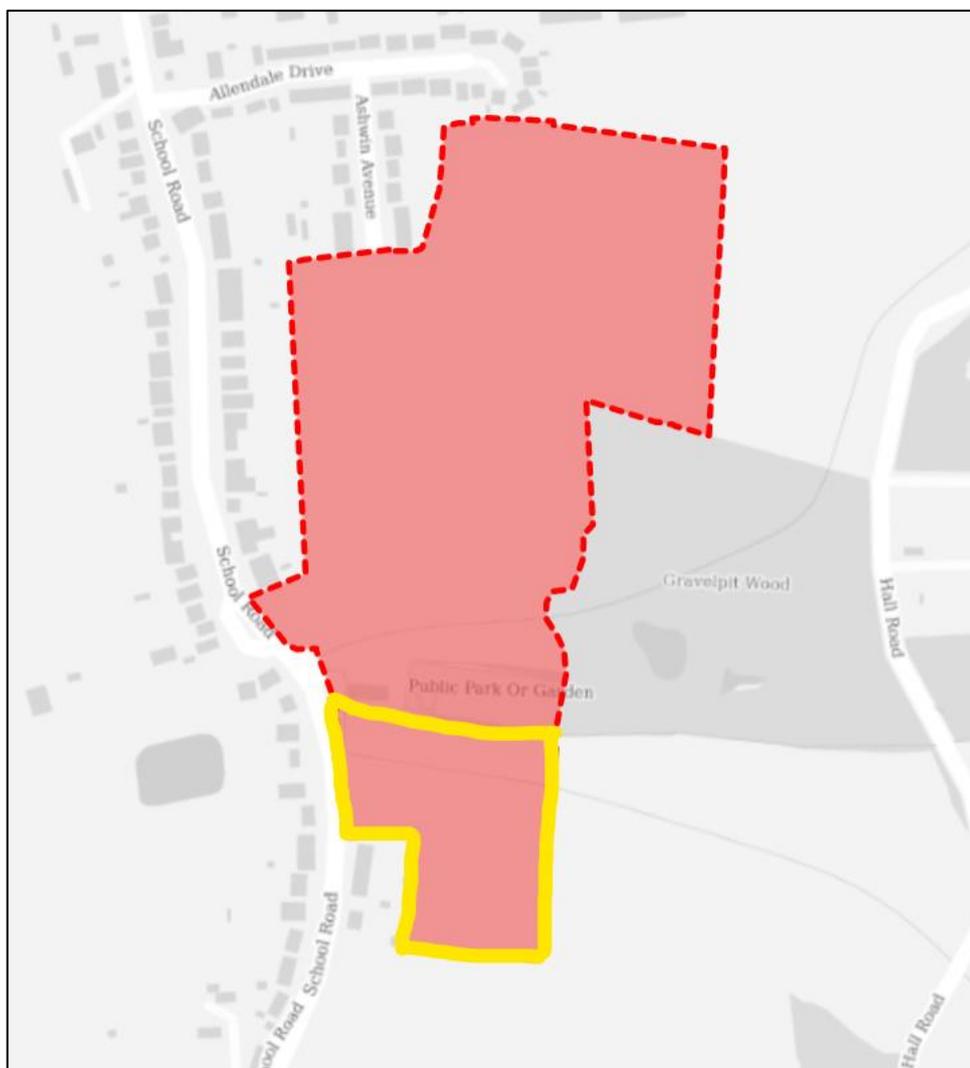


Figure 1: Land owned by The 2008 Angora Bare Trusts (yellow) included in the current allocation PP29 (red)

Structure of the document

1.3 This document comprises the following elements:

- Section 1 Proposed Allocation PP29 Land East of School Road, Copford
- Section 2 Sustainability Assessment

1.4 These representations are supported by:

- Parameter Plan (drawing no. 2716 P01-01), prepared by Owers Warwick Architects;
- Preliminary Access Design (drawing no. KMC25263), prepared by KMC; and
- Public Right of Way Map (drawing no. 4007778) prepared by Essex Highways.

2. Section One – Draft Allocation PP29: Land East of School Road, Copford

- 2.1 On behalf of the landowner, The Angora Bare Trusts, the proposed residential allocation PP29: Land East of School Road, Copford is supported and we can confirm that the site is available and deliverable within the plan period.
- 2.2 Separate representations are being submitted by Welbeck Land on behalf of one of the other landowners, however, both parties are committed to bringing forward a comprehensive masterplan for the draft allocation. Preliminary discussions have also been held with Copford with Easthorpe Parish Council (owners of the majority of the land that lies immediately to the north of our client's land), who are seeking to work collaboratively on this proposal.
- 2.3 As part of this representation of support and commitment to demonstrating deliverability of the site, an indicative Parameter Plan has been submitted to demonstrate key principles for development on our client's parcel, which include indicative locations for development parcels providing a continuation of the linear settlement pattern fronting School Road, green infrastructure, blue infrastructure, open space and parking for the adjacent village hall.
- 2.4 The submitted Parameter Plan illustrates how the development could provide direct pedestrian links to the existing Public Right of Way (PROW) which runs parallel to the site. This would safeguard connectivity to the wider footpath network and support recreational access to the countryside and active travel connections, consistent with the draft allocation's objectives.
- 2.5 However, as drafted and mapped, the allocation boundary does not fully encompass the land required to achieve criterion c. of the draft allocation policy, which seeks safe pedestrian connectivity to existing footways and any public rights of way. The accompanying PROW plan (drawing no. 4007778) demonstrates that the definitive alignment of the PROW adjacent to our client's parcel to both the south and east lies slightly beyond the current allocation boundary as shown on the policies map. To ensure that future development can deliver compliant and direct links to the PROW network, the allocation should be extended marginally to reflect the correct position of the PROW and to enable deliverable connections to be designed and secured through the masterplanning process.
- 2.6 It is also proposed to provide additional connections to the existing playground and village hall, ensuring that existing community facilities and spaces are connected with the proposed development. As part of the key development principles shown on the indicative Parameter Plan, it is also proposed to update the existing footbridge to the north east corner of the site boundary, further enhancing integrated recreational links to the countryside.

- 2.7 A safe and suitable access to our client's parcel can be achieved off School Road to the south of the village hall and a provisional access design has been prepared to demonstrate this.
- 2.8 Green buffers along the site boundaries will ensure that the development is sensitively integrated into the landscape and reflect the rural character of the area.
- 2.9 It is noted that criterion d. states:

"A replacement village hall must be delivered within the site, well connected to new homes and existing homes in Copford."

- 2.10 Following informal discussions with Copford with Eastthorpe Parish Council, it is understood that the existing village hall is held for charitable purposes, with legal title vested in the Official Custodian for Charities on behalf of Copford Village Hall. This ownership structure does not preclude change; however, proposals involving relocation, disposal or replacement of the existing village hall can be subject to charity trustee governance and compliance with charities law safeguards for dealings with charity land. In practical terms, this can introduce additional procedural steps and timing dependencies outside the direct control of developers.
- 2.11 Furthermore, Paragraph 98 of the NPPF expects plans to guard against the unnecessary loss of valued community facilities and to ensure established facilities are able to develop and modernise and are retained for the benefit of the community. In this context, a policy requirement for a wholesale replacement of the existing village hall is unnecessarily prescriptive where equivalent or improved outcomes could be achieved through the retention and improvement of the existing village hall.
- 2.12 To support the allocation's effectiveness and timely delivery, it is therefore requested that criterion (d) is amended to provide appropriate flexibility as to how the village hall objective is achieved, without altering the overall quantum or intent of the allocation. Having informally discussed our proposal, the Parish Council has acknowledged the alternative option to retain and refurbish the existing village hall, alongside additional off-street parking provision (which could be accommodated on our client's land, as shown on the indicative Parameter Plan) to help address existing congestion and on-street parking pressures on School Road at peak times i.e. school drop-off and collection, which is a known and prevalent issue in the village. This approach would secure tangible community benefit while reducing the risk of delay associated with a mandatory replacement solution. It is therefore proposed that criterion d. is revised to allow either replacement of the village hall or its retention/refurbishment with associated improvements, to be agreed through the comprehensive masterplanning process in consultation with the Parish Council and the hall trustees. Criterion d. could therefore be reworded as follows:

"A village hall solution to be agreed through the masterplanning process in consultation with Copford with Eastthorpe Parish Council and the village hall trustees."

This may be achieved either through (i) the delivery of a replacement village hall or (ii) the retention and refurbishment of the existing village hall together with associated improvements (such as enhanced parking provision)."

3. Section Two – Sustainability Appraisal

- 3.1 The 2008 Angora Bare Trusts agree with the overall findings of the Sustainability Appraisal in relation to the assessment of the draft allocation PP29.
- 3.2 Set out below are comments and observations on the Sustainability Objectives in relation to the draft allocation and how these have already been considered as part of the indicative Parameter Plan.
- 3.3 The Sustainability Appraisal states: *Policy PP29 requires that the development of site 10226 and 10611 should be supported by a Minerals Resource Assessment. This requirement is likely to help support more efficient use of land and natural resources by preventing the loss of access to viable minerals in the plan area. However, the policy would not mitigate the loss of greenfield land and Grade 2 and 3 agricultural soils within the site. As such the significant negative effect recorded for the site in relation to SA objective 2: Efficient use of land remains applicable.*
- 3.4 We would like to make the observation that whilst the SLAA categorizes the land to the south of the village hall as comprising Grade 3b agricultural land, this does not appear to have been reflected in the Sustainability Appraisal highlighted above. Grade 3 is subdivided into 3a and 3b, with 3b being at the lower end of versatile agricultural land. Thereby the loss of this area of greenfield land as part of the draft allocation would have a lower overall negative effect in regard to efficient use of land.
- 3.5 In line with SA objective 4: Transport and SA objective 5: community and health and wellbeing, the indicative Parameter Plan submitted as part of this representation demonstrates that additional pedestrian connections can be achieved to the existing PROW network providing active travel links to the settlement and countryside. Alongside this, connections can be provided to the existing play area, located behind the village hall, as well as providing further opportunities for an additional play areas and open space, ensuring that future development contributes to enhancing existing and future residents health and wellbeing opportunities
- 3.6 As highlighted in the previous section of this representation, Copford Parish Council have acknowledged our client's option of retaining and refurbishing the village hall (alongside additional parking) as opposed to its replacement. The village hall is conveniently located and one of the key development principles is to provide some additional car parking for the village hall which can also be utilised by the community such as parents dropping off and picking up for the local primary school. This in turn will help to alleviate congestion along School Road associated during peak school drop-off and collection hours. There is a footpath that runs along School Road which provides a safe and convenient access route to the school which new links through the site will connect to.
- 3.7 SA objective 8: biodiversity and SA objective 9: landscape require opportunities to be provided for green infrastructure, recreational access to the countryside and

active travel links. To ensure that these objectives are incorporated, key development principles shown on the indicative Parameter Plan demonstrate that green buffers will be implemented along the site boundaries, reinforcing the site's landscape value and ensuring that the development can be sensitively integrated into the landscape to reflect character of the area. Alongside this, strategic open space will be provided, and landscape community spaces with links to connect to the wider network of public footpaths, ensuring that there is a contribution to habitat connectivity.

- 3.8 The 2008 Angora Bare Trusts look forward to working with Colchester City Council and the other allocation landowners to deliver a high-quality residential development which reflects the character and housing needs of the area.



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