

# Copford with Easthorpe Parish Council

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## **Comments from the Parish Council on Regulation 18 draft Local Plan Public Consultation**

Within the Copford with Easthorpe Parish there are two proposed sites for housing:

Policy PP 29 : Land East of School Road Copford:300 homes

Policy PP17 : Land behind shops off London Road Marks Tey:1500 homes. While this is described in the draft Local Plan as 'Marks Tey' the proposed site crosses the Marks Tey/Copford Parish boundary with approximately 600 homes in the Copford with Easthorpe Parish.

The current draft Local Plan therefore proposes an additional 900 homes for the Parish. If we estimate (conservatively) an average of 3 people occupying each new home that is an additional 2700 people. At the 2011 census Copford with Easthorpe had a population of 1725 occupying 680 dwellings.(this has recently increased by 56 homes with an unknown population and is not included in any increase) The draft Plan increases the Parish population by approximately 250% and the number of dwellings by 132%

Whilst the Parish Council recognises the City Council's need for sites to meet the government targets of approximately 21,000 home across the City in the new Plan period, we have a number of concerns about exactly where and how these homes and how associated infrastructure will be delivered.

The above data demonstrates a clear argument that the proposed allocation for the Parish is neither fair nor proportionate.

**In Section 2, 2.19 the Vision** and approach to Local Plan statements 'on preserving Colchester's identity' and 'improving the quality of the life of our residents' are ones shared by this Council. However, the sheer number of homes proposed in PP17 and PP29 will have a significant, overall negative effect on this Parish. We believe the numbers and sites are not in line with the vision of the Copford with Easthorpe Neighbourhood Plan which seeks to 'preserve our identities, rural nature and biodiversity'

Within our Neighbourhood Plan well planned smaller developments are favoured (Objective 3) The likely housing density under PP29 will significantly impact on the rural nature of the Parish and could be seen conflicting with Copford with Easthorpe Neighbourhood Plan Policies CE1 and CE2a.

The proximity of seven Grade 2 listed buildings and the Copford Green Conservation area whilst not affected by PP29 directly will be impacted by the inevitable increases in traffic generated by any proposed development.

Any homes built on either site, must be in accordance with both the Copford and Easthorpe Neighbourhood Plan Policies CE3/CE4 and the detailed AECOM design guidance and code which complements our Neighbourhood Plan.

Whilst a City Housing Needs Survey is quoted, it does not reference the Copford Local Housing Needs survey carried out by RCCE for the Parish Council which identifies homes for families and bungalows for down-sizing as two of the most important local needs.

With regard to the allocation at PP17, given the Council's recent refusal to approve an application for 175 homes in Tiptree due to 'cross boundary' issues, it should automatically follow the proposed 1500 allocation

with a significant number of homes (approximately 600?) straddling the parishes of Copford and Marks Tey would also be rejected, leading to further separation of homes within Marks Tey Parish.

With the potential inclusion of both sites, apart from the numbers, this Council is also concerned about a number of issues relating to infrastructure provision in particular:

### **Wastewater treatment**

Copford Water Recycling Works has a limited capacity for dealing with waste water, with only 33% permitted DWF Capacity Remaining (Colchester WCS Interim Findings February 2025) This identifies ‘a high risk of water quality non compliance’

These figures do not have a separate entry for PP17 1500 homes (nor the proposed 1000 north of A120 at Marks Tey)

The interim AECOM report states that there will be sufficient water supply for new developments but does not indicate exactly where this will come from. There has been a suggestion that much of the needed additional water will come from reducing domestic usage to perhaps below 100L per person per day. Given the Governments average daily figure of 138L per person per day and Anglian Water’s one figure of 124L this ‘goal’ seems at best ambitious.

Further the interim report takes no account of either wastewater or water supply attributable to the existing Local Plan allocation -and likely development soon- of 630 homes off London Road Stanway, this will inevitably place further constraints on wastewater and water supply.

### **Road networks and transport**

Not only is the Leader of the City Council on record as saying that existing local road networks are not fit for purpose and congested but at page 11 of the Council’s Infrastructure Audit and Delivery Plan (stage 3) there is an express admission that there are significant issues on both the A12 and A120-and that the issues on the A120 are severe and unsustainable.

Additional homes will place further strain on those strategic highways and that will inevitably have a knock effect on local roads, especially London Road (B1408) and School Road, the likely access road for PP29 which is a major route to/from Copford Primary School and is not only heavily congested at peak school times but is also increasingly used by vehicles (including HGVs) as a ‘rat run’ towards the A12 along Easthorpe Road and also from Maldon Road via Fountain Lane and Aldercar (both of which are narrow single track lanes). This likely increase in traffic from PP29 could be up to 600 vehicle movements daily to/from this site creating significant further congestion, pollution and increased road safety risks for the large number of children who cross this road on their way to school. The proposed development is likely to create an ‘unacceptable impact on highway safety’ (paragraph 116 NPPF) and it is difficult to see how PP29 aim of a ‘safe pedestrian access’ to/from this site can be achieved given 600 potential car journeys from this site.

Significant mitigation would be needed if this site is to be safe for all users, examples could include traffic calming measures and roundabouts. The suggestion of a ‘park and ride’ scheme is to be encouraged but land allocation and access is problematic. There are also well documented flooding issues in School Road.

**In Policy ST1 –Health and Wellbeing-**‘active travel’ is rightly promoted but whilst this is a commendable objective, it is hard to see how an increase in walking and particularly cycling can be achieved given the likely increase in traffic numbers, congestion and issues along School Road, London Road(B1408) and the A120.

Not only would there be an increased risk of accidents and injury, there would be a significant increases in noise, pollutants, compromised air quality and environmental harm.

The suggested mitigation of a ‘modal shift’ in transport to walking, cycling and public transport from the development onto School Road, London Road and beyond has already been shown to be problematic. Any shift to public transport (or any Rapid Transit System) is again laudable but there are no public transport

services beyond buses on London Road making car journeys the most likely form of transport. Copford with Easthorpe Neighbourhood Plan Policy CE5 highlights the existing inequality of access to public transport within the Parish which can only lead to a car dominated road network.

Page 10 of the Council's Infrastructure and Delivery Plan (stage 3) acknowledges bus services generally in Colchester are limited outside peak hours and supporting infrastructure is often poorly maintained. Services are even more limited the further away you are from the City Centre.

The suggestion from Highways that there would be a small increase in congestion as a result of PP29, PP17 and other local proposals lacks credibility.

### **Effects on local environment PP29 and Policy EN4 Irreplaceable Habitats**

The location of this site next to a Local Wildlife Site-Pits Wood – with a proposed (and inadequate) 15m buffer will cause significant and negative effects on biodiversity particularly on the large badger setts and the population of nesting nightingales-a Red List endangered bird. It broadly conflicts with Copford with Easthorpe Neighbourhood Plan Policy CE2a.

The Woodland Trust recommends between a buffer zone of between 50-100m for such sensitive sites and has identified significant risk to Pits Wood

This Council is aware of one ecological survey that has been carried out on and nearby to the site but would expect 4 seasonal surveys to be carried out to ensure a full picture of biodiversity is obtained. It is essential that the full results of these surveys are shared with Pits Wood Trustees and the Parish Council.

The potential increase in green wildlife corridors from the Roman River corridor is to be welcomed.

If this site is to go forward unchanged, the Parish Council-as owners of Pits Wood with the Trust-would expect urgent discussions about how any mitigation measures will be put in place prior to any commencement of building.

### **Policy ST1: Health and Wellbeing**

The aims of this policy are laudable, however the ability to implement 'health provision' is questionable as currently local GP surgeries are full and would be unable to cope with the number of additional occupants of 1800 homes (PP17 and PP29) as well as the soon to be built 630 homes in Stanway. Further deficiencies are to be seen in dentistry. Then there is the question of hospital provision.

As has already been mentioned, 'd and g' concerning promoting active travel are already commented on under Health and Well-Being.

If PP29 and PP17 plus all other local proposals-Marks Tey, Aldham, Great Tey and Eight Ash Green- are added to the equation, existing health facilities will not be able to cope and the local road networks will become further congested particularly B1408 London Road which provides access to Tollgate in one direction and to the A12/A120 in the other (both of which will become even more congested without any sign of road improvement>)

Planned interventions to provide improved levels of healthcare are essential and any local developments must fund not just rooms but also staffing to meet the needs of a significantly increased population.

### **Community Facilities Policy CS 1:Retention of Community Facilities CS2 Enhancement of and Provision for Community Facilities**

Copford Village Hall is well used and financially viable. It is run as a registered charity, by Trustees who are corporately responsible as Parish Councillors- but it is a completely separate entity from the Parish Council. Whilst replacing the building is mentioned in PP29, there are a number of issues.

The land and Village Hall are shown on the Land Registry as 'belonging' to the Charity Commission yet in the maps of the current draft Local Plan the drawings suggest this land may be used for homes or access.

Detailed discussions would be needed between any developer and the Charity Commission plus existing Trustees to establish if the land can be transferred.

An alternative might be to re-furbish the existing Village Hall facilities and provide additional parking.

If the site of the Village Hall does form part of PP29 allocation, and assuming the land can be used in the manner proposed in the draft Local Plan then given its high level of local community use and financial viability, any replacement building must be built before the existing Hall is removed.

The Trustees and local community must also be involved in any design and location of a new Hall with significant parking-the existing Village Hall car park is used during the ‘school run’ by parents’ dropping off their children and the car park greatly assists in reducing parking on School Road, helping to slightly ease traffic flow.

### **Education facilities**

Whilst the inclusion of a 2 form entry primary school on PP17 is welcome, it does not address the likely numbers generated by 300 homes from PP29 and 1500 homes from PP17. The existing Copford Primary School is at near capacity and would require funding to accommodate any large increase in local children. The situation for secondary and tertiary education is not addressed in any available documentation. With both local secondary schools at almost capacity the likely increase in numbers from PP29 and PP17 alone could not be accommodated, this is before other local developments current or proposed are factored in.

### **Summary and additional comments**

Whilst the Parish Council recognises the need to provide sufficient local housing for the residents of Copford with Easthorpe and the wider Colchester City area, we have serious concerns about whether the Vision can be achieved and if infrastructure-roads, transport, wastewater, water, health, local wildlife areas, health and well being, community provision, and schools-can be in place to support new housing , in the ideal before any housing is put in place.

We are very concerned about the proposals for PP29 (and PP17) and their lack of proportionality when considered against the existing size of the three villages and would prefer to see consideration given to alternative sites of similar size –there is at least one which featured in the ‘call for sites’ ,or looking again perhaps at some of the other sites in the call for sites which were discounted but might achieve the same numbers which would be in keeping with Objective 3 of the Neighbourhood Plan

We have recently had a presentation from Wellbeck Land with an ‘alternative’ to PP29, although we believe this is speculative and not currently in the draft Local Plan. The inclusion of 44 ‘veterans ‘flats’ is in conflict with the design guidance and codes of Copford with Easthorpe Neighbourhood Plan (being out of keeping with the design and nature of homes in the Parish area in Objective 3) and given the location seems to have little to offer veterans. The veterans flats seem, frankly, to be a way of trying to reduce the number of affordable homes in this development.

The proposal from Wellbeck suffers from most of the issues of the existing PP29, it is on a bigger footprint - albeit on one side of the Village Hall only-and does not seek to use the Village Hall site-but it will impact on more residents and there are a number of serious, unaddressed issues relating to emergency access.