



Our Ref: IB/25026/WelshwoodParkResidentsAssociation

Colchester Planning Policy Team

Colchester City Council,
Rowan House,
33 Sheepen Road,
Colchester,
Essex,
CO3 3WG

12th January 2025

Dear Planning Policy Team,

Colchester City Council - Local Plan Review – Regulation 18 Consultation Stage

1.0 INTRODUCTION

- 1.1. This representation is submitted by Andrew Martin Planning (AM-P), on behalf of the Welshwood Park Residents Association.
- 1.2. One of the many aims of the Welshwood Park Residents Association is to preserve and enhance its local area for the benefit of its residents and other local residents, now and into the future.
- 1.3. The Association wish to make clear that it recognises that the Council has to meet challenging Government set housing targets and that there is a need to build new housing, supported by appropriate infrastructure, within the City. However, as will be set out in detail in this representation, they wish to raise several concerns in relation to the proposed allocation for North East Colchester – Policy PP9 (particularly in relation to the area south of the existing rail line of the allocation identified as Land North of Bromley Road and Shaws Farm- site IDs 10616, 10616a & 10616b). The allocation of the site in combination with the proposed Tendring Colchester Borders Garden Community (TCBGC) (Policy SP7), proposed to be located a short distance away, threatens to have a substantial adverse impact on Welshwood Park and local area.

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Background and Context

- 1.4. Welshwood Park is a close-knit community located in the northeastern edge of Colchester. The area of primary concern to the Association is set out in Appendix 1. The area is made up of over 200 residents and 100 households.
- 1.5. Abutting Welshwood Park, on the eastern side of Colchester, are large areas of agricultural fields and woodland areas. As will be set out in detail in this representation, this area is extremely important and valuable both in terms of its ecological value and landscape characteristics. This is already demonstrated by the fact that the area has several important designations and protections on it.
- 1.6. Home Wood, Welsh Wood and the eastern section of Thousand Acres woodland are classified as Ancient Woodland. In addition, Welsh Wood is designated as a Local Wildlife Site (LWS) and as a Local Nature Reserve. Its designation as both a LWS and LNR is due to this diverse wetland habitat mosaic.
- 1.7. The area is defined by the valley of the Salary Brook, a tributary of the River Colne. Salary Brook is a narrow river valley with steep sides that rise up to 30m (AOD) into the lower reaches of the Ardleigh Valley. A narrow floodplain falls within Flood Zone 2 and 3. The northern side of the Salary Brook Valley abuts Welshwood Park.
- 1.8. The majority of the fields which abut the eastern edge of Welshwood Park are located within Landscape Character Area (LCA) A6: Ardleigh River Valley. The LCA comprises the lower reaches of the Ardleigh River Valley, encompassing the Salary Brook on the valley floor and the steep northern and southern valley slopes.
- 1.9. This area of Welshwood Park is characterised predominantly by open agricultural fields, with medium to large arable fields on the northern slopes, smaller pasture fields and grazing marshes on the southern slopes and valley floor. As outlined in the Colchester Landscape Character Assessment (2024), other key characteristics in relation to land adjoining Welshwood Park include: 1) small, scattered deciduous woodland blocks, mainly of ancient origin, punctuate the valley sides; 2) historic character is reflected in the surviving field pattern of remnant enclosed meadow pasture and pre-18th century irregular fields; and 3) an enclosed, intimate landscape with views centred on nearby fields and Salary Brook, framed by hedgerows and mature riparian vegetation.



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- 1.10. It is important to note, as identified within the Essex HLC (2013), that it is of historical significance that in the south along the valley slopes, the original enclosure pattern of 'pre-18th century irregular fields' survives. In addition, the pattern of 'enclosed meadow' survives along the valley floor.
 - 1.11. The area is a valuable resource, with Public Rights of Way (PRoW) (Colchester 111, 113, 114 and Ardleigh 44) crossing this area and landscape, which connect the eastern edge of Welshwood Park to the wider countryside. Other informal paths within the Salary Brook connect to these PRoW and provide access to the valley floor. These paths are well used by local residents, providing them with recreational opportunities, access to nature and a rural 'escape' from the urban area. The Colchester Orbital Route runs through the area.
 - 1.12. In the current planning policy framework, the majority of the area outside of the settlement boundary is designed as 'countryside'. The countryside area is currently afforded a range of protections under Policy OV of the adopted Local Plan. This policy heavily restricts development in such areas, including land adjoining Welshwood Park. Welshwood Park residents consider that the area's existing designations provide the necessary protection and enhancement and see no justification for the existing policy context to change.

Proposed Tendring Colchester Border Community

- 1.13. In 2021, Tendring District Council and Colchester City Council agreed to formally adopt the 'North Essex Authorities' Shared Strategic Section 1 Local Plan'. This plan, amongst other things, identified the broad location of the Tendring Colchester Borders Garden Community and sets out the Strategic Policies (Policy SP9) and the overarching requirements relating to it. While located with Tendring District Council the 'broad location' extends to the eastern side of Salary Brook (the borough boundary with Colchester).
- 1.14. Following this, the Council recently adopted the Tendring Colchester Borders Garden Community Development Plan Document (June, 2025). The DPD contains more detail about the development and the specific requirements that developers will be expected to follow when applying for planning permission and carrying out the development. The DPD includes a Policies Map (Appendix 2) and indicative masterplan (Appendix 3), which sets out general parameters for the development of the Garden Community.



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- 1.15. As set out in DPD GC Policy 1: Land Uses and Spatial Approach, the key development parameters, which directly impact Welshwood Park residents are the delivery of circa 7,500 new homes with a range of shops, jobs, services and community facilities, including education and health and wellbeing provision and the establishment of a new 'Salary Brook Country Park' incorporating land and woodland at and around the Salary Brook Local Nature Reserve.
- 1.16. The emerging Local Plan policy ST9: Tendring Colchester Borders Garden Community states that it will deliver circa 7,500 new homes in the longer term. A total of 3,400 new homes will be delivered up to 2041, with the number of new homes to be divided equally between Tendring and Colchester. Other key commitments include part b) a new 'Salary Brook Country Park' incorporating land and woodland at and around the Salary Brook Local Nature Reserve in Colchester.
- 1.17. Welshwood Park residents wish to stress and underline that proposals in this emerging Local Plan, particularly those seeking to extend the urban edge of the eastern part of the City, must be considered in the context of the new Garden Community of 7,500 new homes, which is of a significant scale and which extends from the west of Tendring towards to the eastern edge of Welshwood Park (and wider City) from the west of Tendring. This fact should not be ignored or overlooked in the context of the emerging Local Plan and particularly in relation to Local Plan policy PP9, just because it is located in neighbouring Tendring. The residents of Welshwood Park consider that the combined effects/impacts of the proposed draft allocation PP9 must also be considered in parallel with those effects/impacts of the Tendring Colchester Borders Garden Community. The consequences of both will have long term and lasting impacts, particularly with regards to harmful coalescence, on Welshwood Park and other people living locally and visitors to the area.

Welshwood Park In the Emerging Local Plan – Regulation 18

- 1.18. Policy ST3: Spatial Strategy sets the broad Spatial Strategy for the City. It states that, *"the growth needs of Colchester are balanced against the need to protect and enhance biodiversity, landscape and heritage. The highest areas of sensitivity are receiving the lowest levels of growth in this Local Plan. This approach also ensures that existing settlements maintain their distinctive character and role by avoiding harmful coalescence between them and through conserving their setting. New development will be required to respect the character and appearance of landscapes and the built environment and preserve or enhance the historic environment and biodiversity to safeguard the character of the City"*.



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- 1.19. It is noted that the Council seeks to balance the need to protect and enhance biodiversity, landscape and heritage and seeks to protect highly sensitive areas from inappropriate growth. It is noted that the Council seeks to avoid harmful coalescence. The residents of Welshwood Park generally support this approach and seek to ensure these overall principles are consistently applied in the formulation of policy PP9. Residents of Welshwood Park are of the view that as currently drafted policy PP9 contradicts the Council's overall planning strategy.
- 1.20. Policy PP9: North-East Colchester is the key policy in the emerging Local Plan that will have a direct impact on Welshwood Park and other local residents. To summarise, Policy PP9 seeks to: support a predominantly residential development including community infrastructure, strategic open space and approximately 2,000 new dwellings; provide a new local centre to serve the new and existing local community: provide 'Enhanced Open Space' in excess of 10% of the allocation, including at least one area of strategic open space, habitat creation measures which should be maximised with regard to the Salary Brook strategic biodiversity area; include onsite BNG measures should focus on woodland creation to expand and buffer the SSSI, enhanced connectivity through creation of a green corridor between designated sites, buffers to Welsh Wood and Wall's Wood LoWS; protect Salary Brook water course and the conservation and enhancement of its biodiversity value; and enhancement to the Colchester Orbital and connections between the areas of woodland within and adjacent to the site. It is envisaged that proposals for the allocated site will only be supported where they accord with a comprehensive masterplan in relation to the entire allocation, that has been agreed with the Council prior to submission of any planning application.
- 1.21. As will be set out in the next section, Welshwood Park residents object to the above policy and consider that as proposed it is 'unsound'. Welshwood Park residents have supported this representation with detailed site specific evidence. In an effort to work constructively with the Council, Welshwood Park residents have proposed a number of modifications which they consider will address their concerns and result in a 'sound' Local Plan for the City.

2.0 COMMENTS ON THE EMERGING LOCAL PLAN AND EVIDENCE BASE

Strategic Land Availability Assessment

- 2.1 In reviewing the Strategic Land Availability Assessment (SHLAA), it appears that the wider allocation is covered by St Johns Road (Ref:10256) and 'Land North of Bromley Road' (Ref: 10616). It appears (from mapping provided in the Sustainability Appraisal) that 'Welshwood Park (Ref: 10616a) and Land North of Bromley Road (Ref: 10616b) have been assessed in the Sustainability Appraisal but are not



assessed as part of the SHLAA. It is Welshwood Park resident's view that the whole of the allocation should be assessed as part of the SHLAA process to ensure a vigorous selection process has been undertaken. Further assessment of the wider allocation needs to be undertaken.

2.2 Welshwood Park residents' main concerns relate to 'Land North of Bromley Road' (Ref: 10616), which has a site area of 29.8734 ha and which has been promoted for housing purposes. The SHLAA raises a number of concerns (assessed/graded as 'amber' and 'red') in relation to the site. The concerns noted are:

- Allocation of the site will make a significant contribution to coalescence;
- The suitability of the access will impact on the site's deliverability;
- Allocation will result in redevelopment of a site that is over 75% 'greenfield';
- Allocation will result in redevelopment of a site that is 50% grade 3b agricultural land;
- Allocation will result in redevelopment of a site that will result in the loss of, or partial loss of, public open space, a Public Right of Way (PRoW);
- The allocation is partially located in areas at high risk of flooding;
- The site is located in a Mineral Safeguarding Area.

2.3 It should also be stated that while there is no local wildlife designations located within the parcel, as set out previously, it does immediately adjoin them.

2.4 Each of these issues will be explored further in the representation and detailed site specific information will be provided to demonstrate that the issues outlined above undermine the allocation of the site and question its future delivery as part of allocation PP9.

Sustainability Appraisal

2.5 The Sustainability Appraisal has assessed the wider allocation as Farm Buildings (Ref: 10256 and 10256a - presumably this is the same as St Johns Road given the same SHLAA reference?) and 'Land North of Bromley Road' (Ref: 10616). It appears (from mapping provided in the Sustainability Appraisal) that 'Welshwood Park (Ref: 10616a) and Land North of Bromley Road (Ref: 10616b) have been assessed as part of the Sustainability Appraisal, but to reiterate, were not assessed as part of the SHLAA.

2.6 Individual sites (refs: 10616, 10616a and 10616b) were assessed against the Sustainability Appraisal Objectives. The allocation of these sites were assessed as having a minor negative effect on SA2 –



Support of efficient use of land, SA6 – Provide access to services, facilities and education and SA 13 protect and improve air quality. Potential significant adverse effects were identified in relation to SA8 – Protect, conserve and enhance biodiversity and promote and conserve geodiversity and SA9 – Conserve and enhance the character and distinctiveness of the landscape.

- 2.7 With specific reference to biodiversity, appendix C of the Sustainability Appraisal, misunderstands nature conservation legislation. In paragraph C.90, on page 80, it states that Local Nature Reserves (of which Welsh Wood is one) is a non-statutory nature conservation site. This is incorrect as a 'Local Nature Reserve' is a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949. This error may have resulted in the impacts on Welsh Wood not being categorised correctly. Furthermore, the assessment criteria for biodiversity in Table D8, page 112-113, omits to include veteran trees as ecological features which might be harmed by development (see later comments in paragraphs 2.34 and 2.50 – 2.51).
- 2.8 The detailed assessment of PP9 as set out on pages 355 – 359 given a significant negative score for biodiversity, the lowest possible. However, even after considering mitigation in policy PP9, it still scored negative for biodiversity, indicating that full mitigation isn't possible. The appraisal (paragraph 5.250) confirms that harm to Welsh Wood (LNR/Local Wildlife Site / Ancient Woodland) and Wall's Wood (Local Wildlife site and part Ancient Woodland) is reduced but not prevented. Veteran trees are not mentioned as part of the assessment, nor is the newly identified remnant of Welshwood Park historic parkland (see paragraph 2.40), which is a significant oversight.
- 2.9 It is also noted that other sites promoted for development within the Local Plan have been rejected, due to harm to woodland biodiversity. These sites include:
- SA reference: 10154 – Colchester Willows Ground
 - SA reference: 10322 – Land adjacent to Rowhedge
 - SA reference: 10953 - Middlewick
 - SA reference: 10972 – Spring Lane
 - SA reference: 10548 – Land East of Hall Road
 - SA reference: 10716 – The Willows
 - SA reference: 10257 – Wooden Elm
 - SA reference: 10934 - Geantree
 - SA reference: 10181 – Peldon Hall Farm
 - SA reference: 10228 – Land Adjacent to Lower Road
 - SA reference: 10762 – Land North of Grove Road



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- SA reference: 10231 – Land North of Colchester Road
 - SA reference: 10594 – Wivenhole Quarry
 - SA reference: 10751 – Land Off Croquet Gardens

2.10 Given the existing context and designations on and adjoining PP9, it appears inconsistent that PP9 this has not been discounted for similar reasons.

2.11 While high level general mitigation measures are discussed in the SA, as will be set out in this representation, detailed information/evidence is provided to demonstrate that the constraints identified by the Council in both the SA and SHLAA need to be considered in far more detail. It is Welshwood Park residents view that the evidence presented in this representation acts to undermine the deliverability of proposed allocation PP9 as currently drafted. The evidence provided in this representation clearly demonstrates that areas of the proposed allocation are in need of protection and enhancement and are not suitable for any development, certainly not at the scale currently proposed. It is Welshwood Park residents view that the policy PP9 needs to be significantly modified to respond to the evidence presented and ensure that it is 'sound'.

Landscape Impact

2.12 There is serious concern that allocation and redevelopment of the area will have a significant adverse impact on the sensitive landscape character. This representation is supported with a Landscape Value and Sensitivity Appraisal, prepared by Nigel Cowlin Ltd (included in Appendix 4). The purpose of the document is to provide an appraisal of the landscape value and landscape sensitivity of land affected by a proposed development allocation (PP9), particularly focusing on the area southeast of the rail line which borders Welshwood Park (SHLAA ref: 10616).

2.13 Draft policy PP9 includes several parameters, which require some direction in relation to spatial arrangements within the allocation. Given the parameters and requirements set out in PP9, it seems clear that the proposed quantum of built development cannot be wholly accommodated within the north-west half of the allocation (i.e. above Parsons Heath) and therefore it must be assumed that the intention is for some significant built form to also be accommodated within the land to the south-east of the railway line (SHLAA ref: 10616). The supporting Appraisal (Appendix 4) therefore considers the implications of substantive housing development within this southern area.

2.14 For context, it is worth reiterating and referencing the NPPF and the guidance it provides in relation to landscape. The NPPF sets a hierarchy of importance, or weight, to be given to the protection of



the landscape in both planning policy formulation and decision making, based on the recognition of value for any given landscape. Of most relevance, paragraph 187 (a) which states, “planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes ... (in a manner commensurate with their statutory status or identified quality in the development plan)”.

- 2.15 The supporting Appraisal in paragraphs 3.6 – 3.9 defines what a ‘valued landscape’ is and confirms that in the absence of any local landscape designations, it is appropriate to undertake an appraisal of local landscape value, as part of a LVIA/LVA, by following the guidance provided in LI TGN 02/21.
- 2.16 The supporting Appraisal confirms that land within draft allocation PP9 does not currently have a local landscape designation. However, the supporting Appraisal provides a historical timeline that shows that significant areas of the land south of the rail line have previously been designated and considered ‘valued landscape’. In previous iterations of Colchester’s Local Plan, Salary Brook has been designated as a Special Landscape Areas (SLA), latterly renamed as a Countryside Conservation Area (CCA). The extent of the old Salary Brook SLA is depicted with a yellow edge on Figure 5 of the supporting Appraisal in Appendix 4.
- 2.17 Further, in the early 2000s, the then Colchester Borough Council commissioned a suite of studies looking at landscape character, landscape value, landscape sensitivity and capacity issues for the varied landscapes across the borough. As previously referenced, the resultant Colchester Borough Landscape Character Assessment (2005) defined the majority of the land adjacent to the east of Welshwood Park as within Landscape Character Area A6: Ardleigh River Valley. Mapping of these district level landscape character areas is provided in figure 6 of the supporting Appraisal in Appendix 4 It should be noted that the 30m contour line is taken as the dividing line between this and the adjoining character area of B7: Langham Farmland Plateau. It is considered that this boundary is inappropriate as the land at the top of the valley should be included within character area A6 and not within B7 as is currently the case. The existing established treed field boundary should be used as the dividing line. This should be reviewed as part of the evidence base moving forward. The 2005 study recorded the valley of the Salary Brook as ‘high value’ and recommended that it was designated as an Area of Landscape Importance (ALCI). Notably the dividing line was not the 30m contour line as currently set, instead it was the densely treed field boundary, as discussed above. The extent of the then proposed Salary Brook ALCI is marked in green in figure 7 of the supporting Appraisal in Appendix 4. This should be amended within the Colchester Landscape Character Assessment (2024) to ensure consistency. LUC, the consultants that prepared the assessment issued within the current Local Plan evidence base should review this in detail.



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- 2.18 As referenced previously, the Colchester Landscape Character Assessment (2024) is included within the current Local Plan evidence base. Unfortunately, it only assessed landscape value strictly by landscape character areas and not on specific site areas. Welshwood Park residents' request that Salary Brook is assessed individually (including the dividing boundary between character areas) to ensure that the Council has a site specific view of its landscape quality and sensitivity. Nonetheless, to reiterate, the assessment found that A6: Ardleigh River Valley (the valley of the Salary Brook) should be considered to be of high landscape value.
- 2.19 The key point to underline is that individually and collectively, historical and the current landscape assessments all point to the land to the east of Welshwood Park (Salary Brook) as being of high value and capable of being designated a 'valued landscape'.
- 2.20 It is Welshwood Park residents' view that the area south of the rail line should be removed from allocation PP9 given its landscape value and quality. However, if it remains as part of PP9, it should be designated as an area of landscape value to be protected and enhanced.

Landscape Value

- 2.21 Notwithstanding the above evidence, a site specific and more focused supplementary appraisal of landscape value has been carried out for the local landscape setting of Welshwood Park (paragraphs 3.18 – 3.21) in the Landscape Value and Sensitivity Appraisal, prepared by Nigel Cowlin Ltd (included in Appendix 4). Overall, the supporting Appraisal assesses that the area has a concentration of notable intrinsic landscape qualities, with few detracting aspects. These attributes and qualities are indicative of elevated landscape value for the Salary Brook valley landscape. This confirms and reinforces that the area should be regarded as a high value landscape and provides clear evidence for a judgement that this is a landscape of value elevated above other more everyday landscapes. The supporting Appraisal finds that the area should be regarded as a 'valued landscape' when considering planning policy development (and planning decisions).
- 2.22 To reiterate, it is Welshwood Park residents' view that the area south of the rail line should be removed from allocation PP9 given its landscape value and quality. However, if it remains as part of PP9, it should be designated as an area of landscape value to be protected and enhanced.



Landscape Sensitivity

- 2.23 As set out in the supporting Appraisal in Appendix 4, it finds that with the analysis of landscape attributes and qualities, it would seem quite clear that a development in line with the proposed PP9 allocation would be strongly discordant with the established character of this section of the Salary Brook valley. The supporting Appraisal assesses that development of this nature would greatly interfere with and, in many cases, overwhelm some of the identified aspects of landscape quality. In particular, the tranquility and rurality of this area would be greatly compromised, because development would become the defining feature enclosing the valley side to the west. Even if only a relatively small proportion of the overall proposed development were to be accommodated within this part of the Salary Brook valley, this would be in stark contrast to the existing built edges of Colchester being more set back from the steepening valley side and being set behind or embedded within woodland. The scenic appeal would be compromised for similar reasons, but mainly because the openness of the valley scene would be diluted by such development. The distinctiveness of the valley scene would be greatly compromised because this relies on the contained and intimate nature of the valley, separate to and with little direct influence from adjacent built development. The intrusion of new development into this landscape would fundamentally undermine this aspect of value.
- 2.24 The supporting appraisal assesses that this landscape therefore must be regarded to have a high level of susceptibility to the types of changes that would be brought by expansion of housing development into the valley landscape, as would result from implementation of the proposed PP9 allocation. As a 'valued landscape', and with high level susceptibility to the type of changes that the proposed PP9 allocation would bring, the Salary Brook valley east of Welshwood Park must be found to be of high level sensitivity.

Overall Conclusion on Landscape

- 2.25 This supporting Appraisal of landscape value and sensitivity demonstrates that the Salary Brook part of the valley should be considered to be a 'valued landscape' and that it is highly sensitive to intrusion from new housing development.
- 2.26 The area has a number of key characteristics which are distinctive and need to be protected and enhanced. The construction of thousands of new homes in this area will significantly alter and adversely impact the rural character and tranquility of the area. Proposals will completely undermine the undeveloped rural character and likely to lead to the loss of mature hedgerows (inclusive of



Ancient & Veteran trees) and woodland, losing a localised sense of enclosure and intimacy, including along the valley floor. The greater sense of openness will be lost from the higher valley slopes if development is introduced. In particular, development on the more open valley slopes in the north will be visually intrusive and will fail to preserve the rural setting to the east of Welshwood Park (and wider Colchester). This would significantly alter the rural setting of Welshwood Park (and wider Colchester). It will erode existing wetland landscape and a green infrastructure buffer between the urban and rural areas (see later comments in relation to New Garden Community). Not only will an important buffer be eroded, but the key character of the valley setting will be undermined with development expanding onto the valley sides. The area's tranquility will be disturbed by new development and associated activity. Any development is likely to result in loss and significant harm of existing woodland and therefore increase the visual prominence of this edge of Colchester.

- 2.27 With further development pressure immediately to the east of the valley, from the Tendring Colchester Borders Garden Community, there would seem even greater value to this valley area, as countryside break between settlement areas and to provide a recreational green corridor serving both communities.
- 2.28 The management strategy for Ardleigh River Valley LCA is noted within the Colchester Landscape Character Assessment (2024). It states that the overall aim is to conserve and enhance the natural and rural qualities of the valley by managing and protecting Ancient Woodland, extending woodland cover where possible and preserving the ecological value of the Salary Brook and associated wetland habitats along the valley floor. In addition, it seeks to: 1) prevent further loss or decline in the quality of boundary hedgerows and encourage their restoration or reinstatement using species appropriate to the local character and climate; 2) retain and enhance woodland blocks and riparian vegetation to help further integrate the edge of Colchester into the landscape; 3) preserve the historic landscape pattern of remnant enclosed meadows and pre-18th century irregular enclosures to retain the sense of time depth and historic character 4) protect the relative tranquility of the valley sides away from urban influences; 5) avoid visually intrusive and incongruous development within the area, particularly on the floodplain; 6) resist development that would erode the rural character of the valley, such as intrusive lighting, hedgerow removal, road widening, new signage, and sources of noise disturbance. It is resident's view that draft allocation PP9 completely undermines this.
- 2.29 This overall strategy is supported by residents but considered unachievable if significant development is introduced into the Welshwood Park area. It is important that this strategy is reflected with the Local Plan policy to ensure the landscape character of the Welshwood Park area is protected and enhanced.



2.30 It is deeply concerning to Welshwood Park residents that protection and enhancement of the obvious landscape quality of the area is not included within draft policy PP9. The area of the draft allocation to the south of the rail line should be removed from allocation PP9 given its landscape value and quality. However, if it remains as part of PP9, it should be designated as an area of landscape value to be protected and enhanced.

Biodiversity and Ecology Impact

- 2.31 The site has been assessed in the Emerging Allocations Biodiversity Assessment Land North of Bromley Road Ref: 10161 and Welshwood Park – No ref). The general description of the habitats on the site are arable fields, hedgerows, mature trees, and a watercourse. In relation to Land North of Bromley Road, it is noted that the site is adjacent to and between two LoWS (Te6 and Co143) and includes a tributary of Salary Brook. Overall, the condition of these assets is assessed as being 'moderate to good'. A key point to underline is that as set out in the methodology of the document, site visits were not undertaken in the preparation of the assessment. Instead, it used aerial photographs and 'street side images', the limitation of this is recognised in the report. These limitations mean that the ecological value of the site has not been fully assessed by the Council.
- 2.32 While a significant part of the allocation is part arable land, it is noted that the watercourse and hedgerows are considered to be 'high value'. The site is also noted as of high strategic importance, being adjacent to LoWS, the valley of Salary Brook. The Welshwood Park residents have major concerns that redevelopment of this area of the allocation will have a significant detrimental effect on the high value assets and on the adjacent LoWS.
- 2.33 Given the above, this representation representation is supported with an Ecological Appraisal, prepared by Sibbett Ecology Ltd (included in Appendix 5). The assessment finds that there are several ecological features present on the site or adjacent to it.
- 2.34 There are several veteran trees within the allocation, which the Council's assessment does not appear to acknowledge. Their position in the landscape is just 2km north of the nationally important assemblage of veteran trees at Wivenhoe Park means that there is a high likelihood of saproxylic species (e.g. invertebrates, fungi) forming metapopulations using both the combined site and Wivenhoe Park. This would be a strong connection between the veteran trees of the combined site and Wivenhoe Park. The number of veteran trees and the likelihood they contain significant invertebrate assemblages or fungal species means that the site of concern is eligible for selection as a Local Wildlife Site of County-wide value. Veteran trees are irreplaceable. Even with a vegetated



buffer, the veteran trees are likely to be harmed by development within the allocation. The harm may take some years or decades to be expressed, but even a few decades is a small proportion of the life of a veteran tree. This harm has not been identified in the Council's assessment. Had the potential harm to veteran trees been identified, it is considered that the harm score would have been upgraded to 'significant harm' to irreplaceable habitats present as a result of development within the allocation. This harm needs to be recognised and assessed by the Council.

- 2.35 Welsh Wood is the largest remnant of a larger ancient woodland. Welsh Wood is promoted for recreational use which has caused and is causing harm to its ecological value. An asphalt path across Welsh Wood has destroyed ground flora and soils along its route. There is a myriad of desire line path within the wood, where dog walkers and others walk, compacting soil and destroying ground flora. A short section of the Colchester Orbital Route requires people to exit Welshwood and to walk on pavements through the Welshwood housing estate before rejoining the public footpaths by the side of the fields and on to Bullock Wood. Many people take a short cut to avoid this section of the orbital which has created an unofficial footpath over many years. The footpath in question, (which is included in the land allocated for development Site IDs: 10616, 10616a, 10616b), is used extensively by members of the public when walking from Welsh Wood to the existing public footpaths leading to Bullock Wood and the Salary Brook Nature Reserve. In March 2025, documents in support of an application to modify the Definitive Map to include this footpath were submitted to Essex County Council (Ref: HIGH/13485). In support of the application, twenty-one Evidence of Use forms were submitted by individuals, twenty of whom had used the footpath for over twenty years, five for over thirty years and seven for over forty years. The ages of the witnesses ranged from 36 to 86 years.
- 2.36 Further, a stream in the wood has been harmed by walkers crossing it, damaging the banks. There are even two access points from the wood to arable land on the south-west side not shown on the Local Nature Reserve map as seen on signposts. This damage should be of significant concern to the Council. Residents' have significant concern that further development within close proximity to Welsh Wood will add further recreation pressure and therefore further significant damage.
- 2.37 Data from Essex Field Club shows that Species of Principal Importance are present in Welsh Wood including Rustic moth, Buff Ermine moth, and Blood-vein moth, and the Essex listed button snout moth and white admiral butterfly.
- 2.38 With the above in mind, it is assessed that it is not realistic for a buffer to be sufficiently large that impacts from recreation can be excluded; any accessible greenspace will encourage new residents into the ancient woodland where further harm will be caused. A buffer would need to be around 1km



radius so that it is towards the limit of typical walk lengths from a dwelling, if a significant increase in recreational pressure is to be avoided.

- 2.39 This harm has not been identified in the Council's assessment. Had the potential harm to Welsh Wood been identified, it is considered that the harm score would have been upgraded to 'significant harm' to non-statutory designated sites as a result of development within the allocation. This harm needs to be recognised and assessed by the Council.
- 2.40 Further, the assessment has identified a small woodland area which was remnant of Welsh Wood. It comprises a small number of mature oak trees and seminatural ground flora (see figure 4 of the assessment). The "Wood-pasture and Parkland" Habitat of Principal Importance in England includes areas derived from medieval forests and emparkments, wooded commons, parks and pastures with trees in them. This identified area meets these criteria. This area of land is therefore should be valued as a Local Wildlife Site and appropriate buffers would need to be applied to protect it.
- 2.41 Wall's Wood is a Local Wildlife Site, adjacent to the eastern boundary of the proposed allocation. It is a is Lowland Mixed Deciduous Woodland, part of which is Ancient Woodland. It contains public footpaths, including one leading direct from the proposed allocation site. Similar to Welsh Wood, new residential development within the allocation will inevitably result in added recreational pressure into Wall's Wood resulting in significant damage. Again, it is considered that it is not realistic for a buffer to be sufficiently large that impacts from the public can be excluded. A buffer would need to be around 1km radius so that it is towards the limit of typical walk lengths from a dwelling, if a significant increase in recreational pressure is to be avoided. This harm has not been identified in the Council's assessment. Had the potential harm to Wall's Wood been identified, it is considered that the harm score would have been upgraded to 'significant harm' to non-statutory designated sites as a result of development within the allocation. This harm needs to be recognised and assessed by the Council.
- 2.42 Further, the banks of the rail line that runs through the site should be assessed for their ecological value and the potential impact development near and over (e.g. widening of the existing bridge will be necessary) these areas will have flora and fauna and priority species located on them.
- 2.43 The assessment finds that the proposed allocation would cause significant harm to veteran trees, Welsh Wood (ancient woodland, Local Nature Reserve, Local Wildlife site) and Wall's Wood (Local Wildlife site, part ancient) which cannot be mitigated.



-
- 2.44 In terms of Protected Species members of the Welshwood Park residents' Association have reported seeing reptiles including grass snake, nesting skylark, and bats on the southern part of the allocation and regularly submit information to Essex Wildlife Trust's 'Nature Count' recording system.
- 2.45 There is potential for great crested newts to be located in a pond within the allocation, close to Shaw's Farm. Other protected species might also be present.
- 2.46 The railway line acts to cut the allocation in half. It is on a raised embankment, forming a south-east facing slope very suitable for reptile species and potentially some invertebrates which require those conditions. The embankment may act as a source of reptiles and other species entering the allocation land.
- 2.47 Whilst many species can be surveyed for and mitigated in the development, albeit affecting development viability, skylarks will not nest in public greenspace or anywhere which has public access and will be potentially significantly affected by development within the allocation.
- 2.48 The abundance and distribution of an unknown number of protected species is a material consideration which is poorly addressed in the evidence justifying the allocation of PP9. Full surveys will be required. As things stand, the mitigation needs and mitigation costs are unknown. The mitigation adds cost and so reduces viability of the site.
- 2.49 Given this, as concluded in the supporting Ecology Appraisal, policy PP9 should be modified to exclude the area south of the rail line from the allocation due to significant adverse impact on biodiversity. However, as a minimum, policy PP9 should include specific reference to the need to protect the site's high value assets as well as providing sufficient ecological buffers to sensitive sites. Development should be excluded from such areas. Welshwood Park residents also consider that the eastern part of the site's slopes down to Salary Brook should be earmarked for ecological enhancement.

Trees and Arboriculture

- 2.50 An Arboricultural Report has been undertaken in support of this representation (See Appendix 6). The report identifies Welsh Wood as an ancient and semi natural woodland, which is valued for the trees it contains, especially veteran and ancient trees and the plants and animals that they support. It has also identified several 'succession trees', the retention of which will be important to ensure the continued inclusion of ancient and veteran trees within the landscape. It is also noted that specialised and varied habitats with ancient and semi natural woodland provide a home for a wide range of



species, many which only occur in these habitats, particularly insects, lichens and fungi. Individual trees, some of which are of great age and size are key elements of habitats and are also important to historic landscape.

- 2.51 The identified trees are publicly visible and are in good condition. They are assessed as being important feature in the landscape and should be protected with Tree Preservation Orders. Protection of important trees should be a key requirement of policy PP9.

Coalescence and Merging of Urban Areas

- 2.52 Welshwood Park residents have significant concerns that the proposed allocation Policy PP9: North-East Colchester will result in harmful coalescence and in the merging of Colchester with the proposed new Garden Community.
- 2.53 The existing context is such that there is currently a significant gap from the eastern edge of Colchester to the nearest urban settlement. The east of Colchester (Welshwood Park) is approximately 3.5 km from Elmstead Market (south east) and the same to Ardleigh (east across the A120). The location of the proposed Garden Community will reduce this current gap significantly. The distance from east of Colchester (Welshwood Park) to the edge of the Garden Community will be approximately 800m, which is a significant reduction of approximately 75%. The boundary edge of the proposed PP9 allocation immediately adjoins the edge of the proposed boundary of the new Garden Community, which potentially results in complete coalescence and merging with the edge of Colchester with Tendring.
- 2.54 It appears that resisting coalescence and the merging of urban areas is a key concern relating to the new Garden Community. As set out in GC Policy 1, part C in relation to Salary Brook Country Park, the policy states that, "land and woodland around and including the Salary Brook Local Nature Reserve is designated as a new Country Park that will be promoted and managed for that purpose. The 'Salary Brook Country Park' will be protected and enhanced as an important corridor for wildlife conservation, informal recreation, and education, and will connect to the wider network of green and blue infrastructure and walking/cycling routes serving the Garden Community and its 'Neighbourhoods'. This designation will provide protection to this area of countryside and will maintain the long-term physical and visual separation to the adjacent City of Colchester.
- 2.55 The underlined text are principles and aims which Welshwood Park residents support as they address keen concerns in relation to the proposed Garden Community that it will result the loss of ecology



and biodiversity and result in coalescence. However, this policy was agreed before draft allocation PP9 was made public.

- 2.56 A key strategy for the Garden Community is to confine it to land south of the A120, north of the A133, west of the new A120-A133 Link Road and east of a new Salary Brook Local Nature Reserve. The Policies Map (See Appendix 2) includes Strategic Green gaps, which will be protected from most forms of development, to specifically address local residents concerns to future expansion of the Garden Community extending or sprawling into locations where it could eventually merge or coalesce adjoining settlements. Additional open space is proposed adjacent to Salary Brook Local Nature Reserve to strengthen this area as a buffer to the Colchester urban area encompassing the steep adjoining slopes of the Brook as well as nearby woodland.
- 2.57 The interaction and interrelationship between the proposed allocation of Policy PP9 and the allocation of the Garden Community is of key concern to Welshwood Park residents. They have significant concerns that the proposed allocation, particularly the area south of the main rail line adjoining Welshwood Park, will result in a significant reduction in the existing buffer between Welshwood Park and the proposed Garden Community. Development in this area will result in the edge of Colchester (Welshwood Park) moving significantly closer to the edge of the proposed Garden Community. Allocation will significantly reduce the existing physical gap and will result in the visual merging and complete coalescence of the edge of Colchester with that of the Garden Community and Tendring, in conflict with policy GC Policy 1 which seeks to protect the buffer to Colchester.
- 2.58 It is Welshwood Park residents view that policy PP9 should recognise the importance of maintaining a gap between the edge of Colchester and the edge of the new Garden Community and Tendring. This is of central importance to Welshwood Park residents. Wording should be added to policy PP9 to state that a strategic gap will be established to create a buffer between the edge of Colchester (Welshwood Park) and the edge of the new Garden Community and Tendring. It is Welshwood Park residents' suggestion that land consisting of parcel SHLAA ref: 10616 should be designated as a 'Strategic Gap' or 'Country Park'. This will continue and elongate the 'Country Park' proposed as set out in Policies Map (See Appendix 2) relating to the new Garden Community and act as a lasting buffer between the new Garden Community and the eastern edge of Colchester.
- 2.59 It is noted that key policy objectives of PP9 include: part e) 'Enhanced Open Space' as shown on the Policies Map substantively in excess of 10% of the allocation area must be provided as open space. This should include at least one area of strategic open space and multiple areas of less formal and



more incidental open space; part f) As a strategic site, there is potential for a range of habitat creation measures which should be maximised with regard to the Salary Brook strategic biodiversity area as defined on the policies map. Onsite BNG measures should focus on woodland creation to expand and buffer the SSSI, enhanced connectivity through creation of a green corridor between designated sites, substantial buffers to Welsh Wood and Wall's Wood LoWS, gain in watercourse units, and delivery of a range of habitat creation measures including acid grassland; part g) Biodiversity mitigation measures must include a buffer to Bullock Wood SSSI, the size of the buffer must be informed by a survey. The watercourse within the site must be protected and buffered. Opportunities should be taken to secure improved management to the SSSI to include protection from recreational disturbance, and connections between the SSSI and Welsh Wood and Wall's Wood LoWS; part h) Protection of water quality within Salary Brook water course and the conservation and enhancement of its biodiversity value; and part l) Connectivity with existing Public Rights of Way including connection and enhancement to the Colchester Orbital and connections between the areas of woodland within and adjacent to the site.

- 2.60 Establishing and continuing an enlarged 'Strategic Gap' or 'Country Park' in this location will address all the objectives above and bring multiple benefits. It will create and maintain a lasting, long term 'gap' between the edge of Colchester and the built area of the new Garden Community, providing a sufficient 'buffer' between the two. It will create a strategic open space. It will help protect and enhance the highly valued Salary Brook strategic biodiversity area and provide opportunities for BNG. It will assist in providing a buffer to existing protected ecological areas such as Welsh Wood and Salary Brook watercourse and protect a valued landscape area. It will also create opportunities for walking and cycling, providing connectivity, access to nature and link into the Colchester Orbital route.
- 2.61 It is understood that the Council are working with a range of access groups to deliver the Colchester Orbital route as a circular multi-user route around the City's periphery, connecting green spaces, where possible, with cycle routes and bridleways to appeal to the widest range of users. The key aims of the Colchester Orbital project are to create a route that links Colchester's valuable green spaces, to enhance connectivity between them as wildlife habitats, and to create a sense of a green corridor around the town. The project also seeks to strengthen walking links between Colchester, its suburbs and surrounding villages to deliver real alternative sustainable commuting routes, to enhance tourism opportunities and to improve opportunities for active healthy lifestyles, including the expansion of walking horizons of mobility-restricted users. Designation of parcel SHLAA ref: 10616 as a 'County Park' will greatly assist the Council in achieving this.



2.62 It is of considerable concern to resident's that draft policy PP9 fails to recognise the issue of coalescence. Policy PP9 needs to address this issue.

Flood Risk

2.63 Salary Brook forms part of a 15km long stretch that rises outside of the area in Ardleigh (TM 05152 29857) and flows in a south westerly direction to its confluence with the River Colne near Wivenhoe Park (TM 02160 23890). The catchment is primarily rural and runs along the western border of the City.

2.64 As per the NPPF, development should only be allowed in areas at risk of flooding where it can be demonstrated that: within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; the development is appropriately flood resistant and resilient; it incorporates SuDS; any residual risk can be safely managed; and safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

2.65 With the above in mind, areas of the river valley are located within flood zones 2 and 3 and residential development should not be located in these areas, reducing residential capacity.

Topography

2.66 As set out in the Landscape Appraisal, the Salary Brook Vally has relatively steep sides, with a Sharpe 30m decline from the top to the bottom of the valley. To reiterate, the tranquility and rurality of this area would be greatly compromised, because development would become the defining feature enclosing the valley side to the west. The scenic appeal would be compromised for similar reasons, but mainly because the openness of the valley scene would be diluted by such development. Further, the technical challenge of delivering housing on a valley edge should also be considered. This is likely to complicate development in the valley area and the viability of development. It is Welshwood Park residents' view that development should be resisted on the slopes of Salary Brook. This is likely to significantly reduce the site's potential housing capacity, which acts to undermine the Council's housing capacity assumptions.



Loss of Agricultural Land

- 2.67 Much of allocation PP9 is graded Grade 2 & 3 agricultural land. This categorises the land as best and most versatile and therefore its loss is a significant consideration. It appears that the Council development strategy requires the loss of a significant amount of agricultural land. The 'soundness' of the cumulative impact of this loss will need to be considered. Welshwood Park residents raise concerns that too much agricultural land is proposed to be 'lost' which leads to poor food security.

Access and Highways

- 2.68 It is noted that proposed policy PP9, part b) requires "safe and suitable site access to required highway design standards. The point of vehicular access is to be agreed with the Highway Authority and it will need to be demonstrated that the proposal would not be detrimental to highway capacity and safety". Welshwood Park residents wish to make clear that currently vehicular access is significantly limited to the proposed allocation, south of the rail line and north of Bromley Road. There is currently only one established existing single track vehicular access from Bromley Road into the site. This is located between the former Beehive Public House and Brook House (115 Bromley Road) In its current state, it would be completely inadequate to sustain the allocation. It appears extremely difficult to improve given that land either side of the current access is currently in separate private ownership. Further, linear development along the northern side of Bromley Road and steep sided banks makes identifying alternative access arrangements from this side extremely difficult.
- 2.69 Welshwood Park Residents advise that to the north of the railway bridge, the Harwich Road often has long tailbacks (particularly when there is an issue on the A12) which converges on two mini roundabouts, the second of which comes from the Bromley Road. There are already frequent long tailbacks, which will be made worse by the Garden Community and the government's failure to provide funding to widen the A12. There has been a significant increase in traffic on Bromley Road with the implementation of the Bellway and Mill View housing developments located close by. The road is also busy with HGVs travelling to the concrete works further down the Bromley Road and traffic levels will increase further with the new Garden Community development. The added pressure from draft allocation PP9 will only further worsen this situation. Have the Council tested the cumulative impact of all these new and future additional homes on the existing highway? The existing bus service on the Harwich Road is infrequent and only goes to the town centre, not the station. The site currently lacks connectivity and public transport options are limited. The private car will be the main mode of transport for future residents. Significant transport infrastructure and improvements



are needed to support this draft allocation and the draft policy lacks detail, which is extremely concerning for Welshwood Park Residents.

- 2.70 Given the location of the existing rail line, vehicular access from the north from Harwich Road is also extremely limited. There is also currently only one existing single track access that is in private ownership. Importantly, in order to access the southern part of the allocation, vehicles can only do so at a narrow existing single track bridging point at Shaws Farm. It will be imperative that this existing bridging point will need to be significantly widened and improved to enable appropriate vehicular access. Indeed, in order to improve connectivity, walking and cycling links, further bridging points will be necessary across the rail line. Has this been considered in detail by the Council? Have the significant cost implications been considered in relation to the allocation? Has this been discussed with Network Rail, given the disruption bridging the rail line will cause?
- 2.71 Welshwood Park residents advise that there are no suitable access points to the southern part of the allocation through Welshwood Park.
- 2.72 The existing vehicular access arrangements are completely inadequate to support a substantial allocation. It appears there is limited scope to improve existing access points. In order to demonstrate that the allocation is achievable and deliverable, Welshwood Park residents consider that a detailed review of access options should be undertaken before the allocation is confirmed.

Land Ownership and Deliverability

- 2.73 The SHLAA suggests that landowners are open to working in partnership and bringing the site forward in combination with others to enable a comprehensive approach to development. However, there is no clear evidence to suggest that this is the case. Residents within Welshwood Park own parts of land within the allocation and they have never been engaged by the Council to discuss potential allocation. It is Welshwood Park Residents Association's understanding that several landowners are currently resistant to development on their land due to concerns outlined in the representation. The allocation appears to be made up of five different main landowners, with several smaller plots owners also making up a proportion of the site. Given the policy requirements and to reiterate the need to provide appropriate vehicular access, the allocation is reliant on several landowners working together to timely deliver this allocation. Welshwood Park residents request to see a formal agreement from all landowners that they are working together and support the allocation of this parcel. As it stands, certainly in the southern part of the allocation, the site's deliverability is questionable.



Amended Settlement Boundary

2.74 It is noted on the draft Policies Map, in conjunction with policy SP3, that the settlement boundary of Colchester to the east is proposed to be amended to incorporate proposed allocation PP9. Welshwood Park residents want to make clear that they object to these amendments where it relates to land within allocation PP9, south the existing rail line. As has been set out in detail, Welshwood Park residents believe that the southern part of the allocation should be removed from allocation PP9, and as such it is unnecessary to also amend the the settlement boundary at this point. The settlement boundary should remain unaltered and the land south of the rail line should remain outside of the settlement boundary as is currently the case. It is Welshwood Park residents view that the land south of the rail line should remain 'countryside' or designated for protection as outlined in section 3

Constraints Assessment

2.75 It appears that there is little to no evidence provided to demonstrate how the Council has established the proposed housing figures for each of the proposed allocations. Policy PP9 states that 2,000 new homes need to be delivered in the allocation. Given the site constraints and context set out in this report and evidence in the appendices, Welshwood Park residents consider this figure to be unrealistic. It is Welshwood Park residents view that the Council should set out in detail how housing figures have been derived to ensure that allocations are deliverable and achievable.

2.76 To demonstrate Welshwood Park residents' position, they commissioned AM-P to undertake an assessment of constraints (See Appendix 7) of the allocation area. AM-P have reviewed the findings of the Landscape Assessment, Ecology Appraisal and Arboricultural Report and sought to spatially map the findings. AM-P have also used other sources of information, such as EA flood risk mapping and topographical maps to map further site specific constraints.

2.77 As it can be seen, residential development in and around areas of Welshwood Park is heavily constrained due to:

- Protected and landscape quality;
- Ecological quality and the need to protect and enhance;
- The need to provide sufficient 'buffers' to protect existing ecological designations;
- The need to avoid coalescence between east of Colchester and the committed new Garden Community;



-
- PP9 policy ambition of 10% of allocation to be 'open space' and for the establishment of a strategic open space;
 - Noise from existing rail line;
 - Poor existing site access and connectivity;
 - The need to protect high quality veteran/ancient trees/hedges;
 - Steep sided topography of the Salary Brook Valley; and
 - Exclude residential development from areas at a high risk of flooding.

2.78 As demonstrated, areas south of the rail line are heavily constrained and residential use is significantly limited. This therefore has significant implications on the potential capacity of the overall allocation and the soundness of the Proposed Local Plan. It is Welshwood Park residents view that when the constraints and detailed evidence is analysed it is clear that there isn't sufficient capacity within the allocation area to meet the proposed overall housing figure. The figure therefore needs to be reduced to a more appropriate and realistic level to ensure that the allocation is deliverable and achievable and that all identified site constraints can be addressed.

2.79 Indicative parameter plans/indicative frameworks should be provided as part of the Local Plan evidence base to justify capacity estimates for each major allocation, including PP9, to broadly set out how policy proposals can be accommodated and spatially achieved.



3.0 PROPOSED MODIFICATIONS

- 3.1. It is Welswood Park residents view that the southern part of policy PP9: East Colchester should be amended to exclude the southern part of the allocation (south of the existing rail line) from the wider allocation to the north. The settlement boundary at this point should remain unaltered and the land south of the rail line should remain outside of the settlement boundary as is currently the case. It is Welswood Park residents view that the land south of the rail line should remain 'countryside' and also be designated for protection and enhancement for its landscape and biodiversity quality and value. The land south of the rail line should also be designated as some form of 'green gap' to avoid coalescence with the new Garden Community. Welshwood Park residents suggest that designating the land as a 'Country Park', to link with proposals relating to the new Garden Community, would achieve the above objectives and lead to a 'sound' Local Plan.
- 3.2. However, if the land south of the rail line should remain within allocation PP9, Welshwood Park residents suggest the following amendments to policy PP9: East Colchester to address their concerns:
- 3.3. All strategic allocations, including PP9, should be supported by indicative parameter plans/frameworks to demonstrate housing capacity estimates can be achieved given site constraints as set out in each draft policy. This should not be left to a later date. It should form part of the Local Plan process and evidence base.
- 3.4. PP9 part a) A ~~predominantly~~ residential led mixed use development including community infrastructure, strategic open space and approximately 2,000 new dwellings of a mix and type of housing to meet evidenced needs which is compatible with surrounding development
- 3.5. The 2,000 new home estimate is noted, and Welshwood Park residents currently oppose this. It is their view that this figure is unachievable, given the issues raised within this representation with development significantly constrained on land to the south of the rail line as demonstrated by the constraints mapping (Appendix 7). It is Welshwood Park Resident's view that this figure should be significantly reduced in response to their proposed amendments. The Council need to reassess this figure in light of point 3.3 above and further careful consideration of the draft allocation's constraints.



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- 3.6. PP9 part b) Safe and suitable site access to required highway design standards. Identified potential vehicular access points is to be agreed with the Highway Authority and it will need to be demonstrated that the proposal would not be detrimental to highway capacity and safety;
- 3.7. PP9 part e) 'Enhanced Open Space' as shown on the Policies Map substantively in excess of 10% of the allocation area must be provided as open space. This should include at least one area of strategic open space located along the Salary Brook Valley as a continuation of the Salary Brook Country Park proposed as part of the adjoining New Garden Community and multiple areas of less formal and more incidental open space. The continued 'Salary Brook Country Park' will be protected and enhanced as an important corridor for wildlife conservation, informal recreation, and education, and will connect to the wider network of green and blue infrastructure and walking/cycling routes serving the East of Colchester and the Garden Community. This designation will provide protection to this area of countryside and will maintain the long-term strategic gap to avoid physical and visual separation to the adjacent City of Colchester.

Proposed new policy criteria after part e: The Salary Brook Valley should be protected and enhanced as an identified valued landscape.

- 3.8. PP9 part (f) Proposed development should protect and enhance the Bullock Wood SSSI, Welsh Wood, Wall's Wood and newly identify remnant area of Welsh Wood LoWS. As a strategic site, there is potential for a range of habitat creation measures which should be maximised with regard to the Salary Brook strategic biodiversity area as defined on the policies map. Onsite BNG measures should focus on woodland creation to expand and buffer the SSSI, enhanced connectivity through creation of a green corridor between designated sites, buffers to Welsh Wood and Wall's Wood LoWS, gain in watercourse units, and delivery of a range of habitat creation measures including acid grassland;
- 3.9. PP9 part (g) Biodiversity mitigation measures must include a buffer to Bullock Wood SSSI, Welsh Wood, Wall's Wood and newly identify remnant area of Welsh Wood LoWS the size of the buffer ~~must be informed by a survey~~ should be a minimum 1km. The watercourse within the site must be protected and buffered. Opportunities should be taken to secure improved management to the SSSI to include protection from recreational disturbance, and connections between the SSSI and Welsh Wood and Wall's Wood LoWS.
- 3.10. Proposed new policy criteria after part g: Ancient and veteran trees and hedgerows would be protected and enhanced.



3.11. Amend last paragraph of policy CPP9 as follows: “Proposals for the allocated site will only be supported where they accord with a comprehensive masterplan in relation to the entire allocation, that has been agreed with the Council prior to submission of any planning application. **The comprehensive masterplan must broadly accord with indicative parameter/housing capacity plans as set out in the Local Plan.** The masterplan must be of sufficient detail to ensure optimal placemaking and housing delivery outcomes for the allocation and should be informed by an appropriate evidence base. The masterplan should be developed in collaboration with the Council, and relevant infrastructure providers, it should incorporate meaningful engagement with the local community and be informed by use of design review. Where appropriate and necessary, the masterplan shall be supported by parameter plans, design codes and/or guidance”.



4.0 SUMMARY AND CONCLUSIONS

- 4.1 It is Welshwood Park residents view that as proposed the draft Local Plan is currently 'unsound'. They have significant concerns relating to draft policy PP9: East Colchester, particularly relating to land south of the rail line. The allocation lacks justification and is not supported by sufficient evidence.
- 4.2 It is Welshwood Park residents view, supported with detailed evidence, that the land south of the rail line has significant landscape and biodiversity value and should be protected well into the future for the benefit of the City. Coalescences between the east of Colchester and the new Garden Community is a significant concern for residents and addressing this issue is completely absent from draft policy PP9. As drafted, development within draft allocation PP9 will have a significant adverse impacts on landscape, biodiversity and result in visual coalescence with the new Garden Community. This is in complete contradiction to the Local Plan aims and objectives. It is a highly valued and loved area and must not be lost forever to development.
- 4.3 Welshwood Park residents have provided constructive amendments, based on evidence, on how we consider that the Council can amend the Local Plan, particularly policy PP9, to make it 'sound' and meet all its Local Plan aims and objectives.
- 4.4 We hope that the Council will review our representation in detail and take on board our views. Welshwood Park residents are willing to work in partnership with the Council to ensure they deliver a 'sound' Local Plan.
- 4.5 Please do not hesitate to contact me if you wish to discuss or would like any further information.

Yours faithfully,

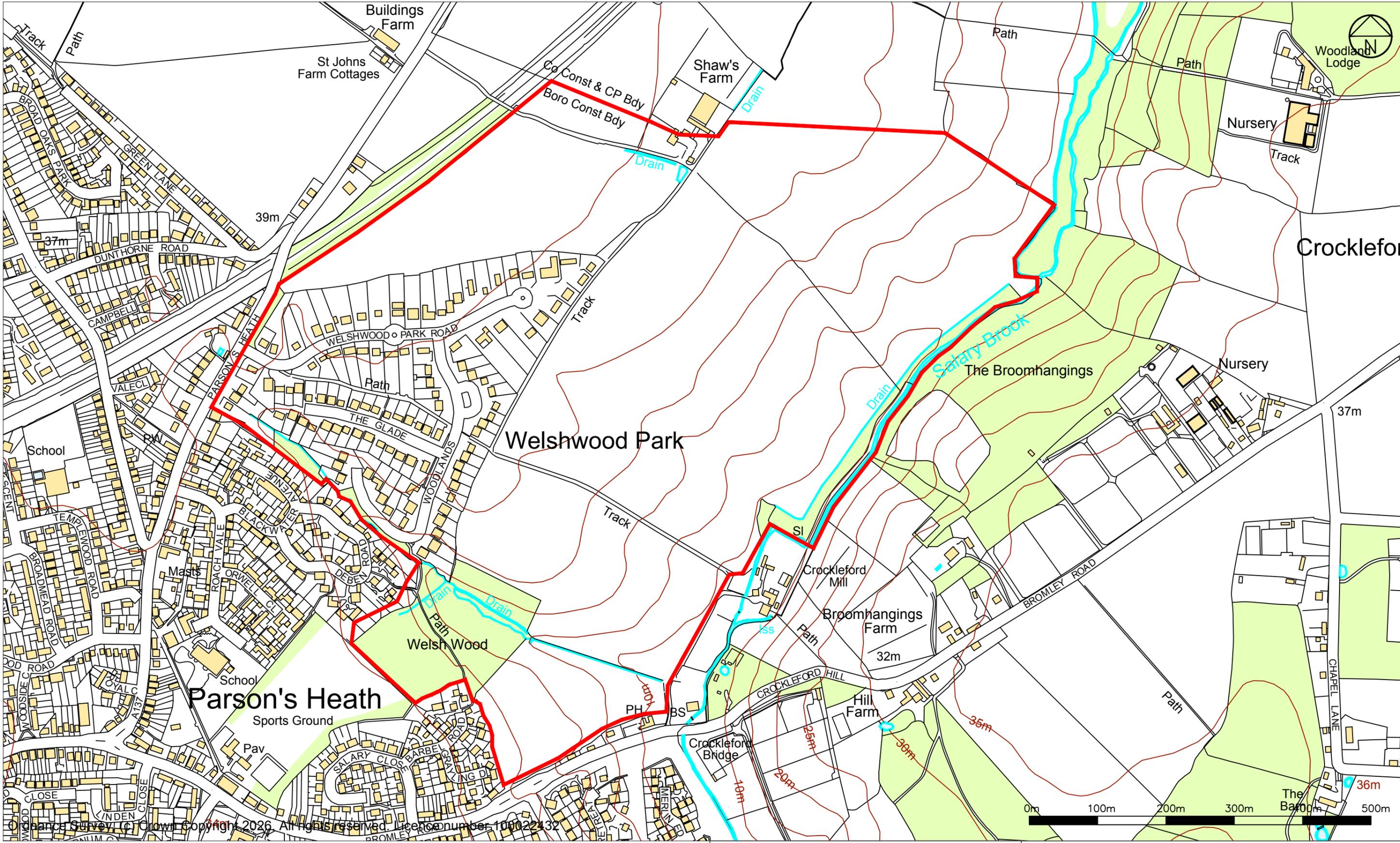
Ian Butcher

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Appendix 1





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Title Subject Site - Area of primary concern Land to the east of Welshwood Park		
Drawing Number 25026_01	Revision a	Revision Detail
Drawn by CH	Date 01/26	Scale 1:5000@A3



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PLANNING
 PLANNING | DESIGN | DEVELOPMENT

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Appendix 2



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SCALE BAR - NORTH POINT Do not scale the drawing



RTS

Proposed Land Use

Site Allocation Boundary

Indicative Route of RTS

Strategic Green Gaps

County Park

Broad Location of Green Corridors

Crockleford Heath Special Character Area

Employment Park

Broad Location of Knowledge Employment

Sports & Leisure Park: General location of buildings (Potential Park & Choose Sports and University related structures)

Sports & Leisure Park: General location of sports pitches, parkland, potential site access and parking

Broad Location of Gypsy and Traveller Site

Potential Vehicular Link

Vehicular Site Access Points (all modes)

Broad location of vehicular site access points (RTS - public transport only) and restricted access to potential Park and Choose, knowledge based employment and adjoining uses only

Broad Location of Park and Choose (alternative locations)

Other Features

Ancient Woodland

Other Woodlands

30m Woodland Buffer (For information only)

Local Nature Reserve

Principal Developable Area

REV	DESCRIPTION	BY	CHKD	DATE

CLIENT
TENDRING DISTRICT COUNCIL
COLCHESTER BOROUGH COUNCIL
ESSEX COUNTY COUNCIL

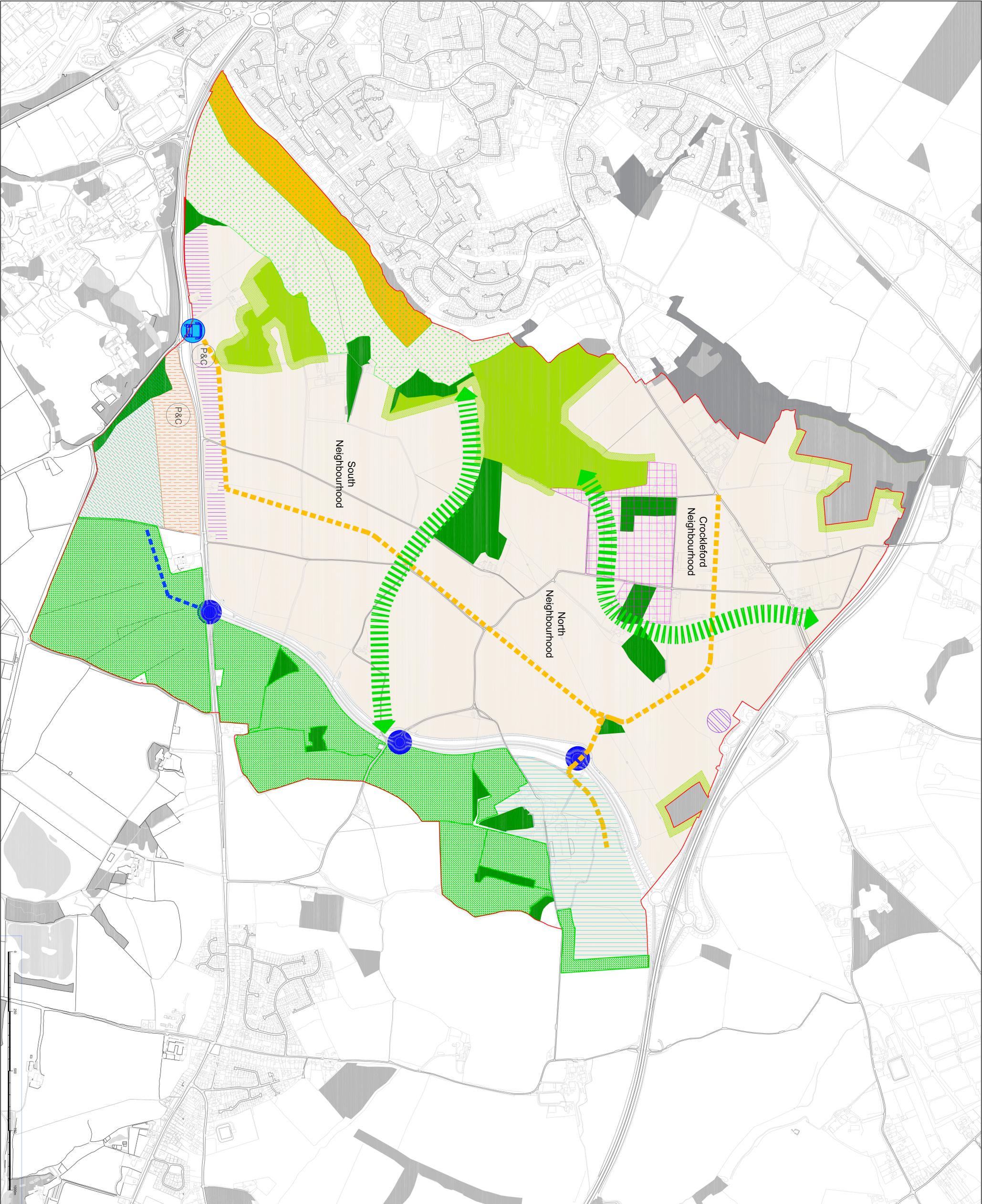
PROJECT TITLE
TENDRING COLCHESTER BORDERS GARDEN COMMUNITY

DRAWING TITLE
Policies Map

DATE	BY	CHKD	APPROVED
02 Aug 2024	AA	CP	-

FOR INFORMATION

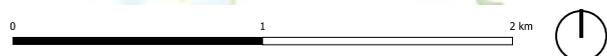
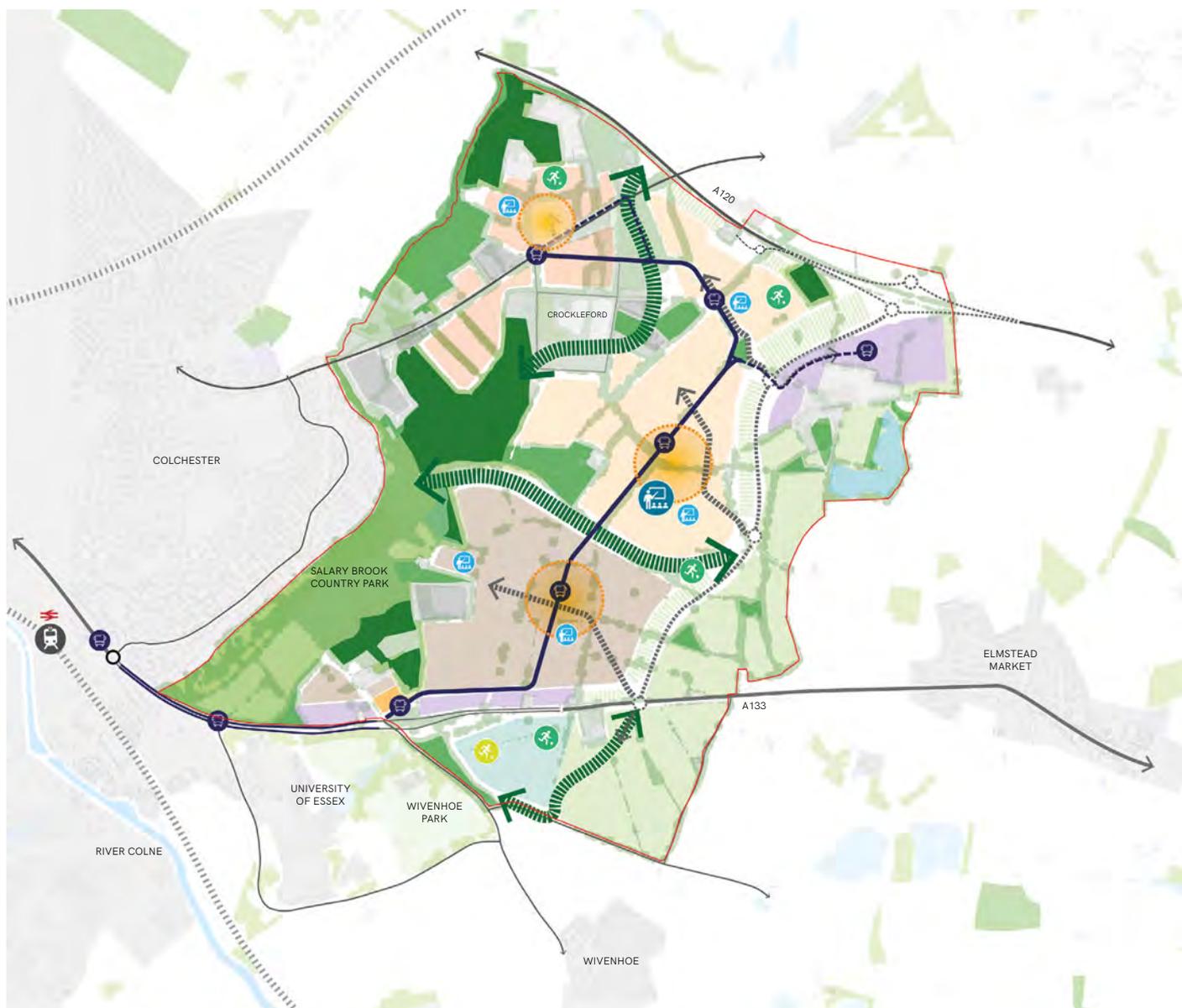
DRAWING NUMBER	SCALE	SIZE	REV
TCB-DWG-DW-PP-01	1:5000	A0	01



Appendix 3



STRATEGIC ILLUSTRATIVE FRAMEWORK MASTERPLAN



KEY

- | | | |
|-------------------------|--|---------------------------|
| Area of Search of TCBGC | Attenuation Ponds | Central Neighbourhood |
| District Boundary | Existing Roads | Crockleford neighbourhood |
| Ancient Woodlands | Green links | Employment uses |
| Woodlands | Indicative Rapid Transit Route/halt | Sports and Leisure Park |
| Country Park | Indicative Peak/additional Rapid Transit Route | Primary Schools |
| Amenity Green Space | Main vehicular entrance points | Secondary Schools |
| Strategic Green Gaps | Proposed Neighbourhood centres | Sports Hubs |
| Water Course | Southern Neighbourhood | University Sports |

*The location of specific land uses, facilities and activities are illustrative and subject to further masterplanning.

Appendix 4

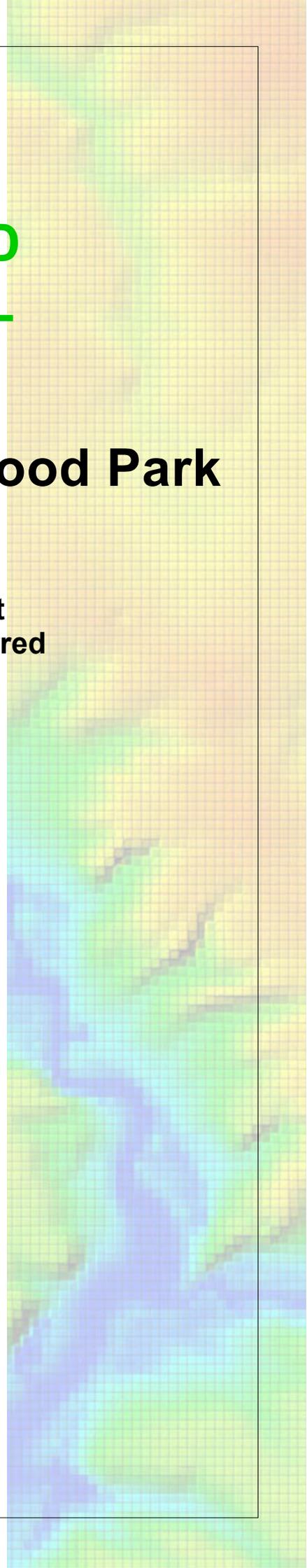


LANDSCAPE VALUE AND SENSITIVITY APPRAISAL

Land adjacent to Welshwood Park

North-east Colchester

**North-East Colchester proposed development
allocation Policy PP9 of the Colchester Preferred
Options Local Plan 2025**



DOCUMENT DETAILS

Document type: LVA
Reference: NC25.938-lva01a
Publish date: 11/11/2025
Client: Welshwood Park Residents' Association
Project name: Land adjacent to Welshwood Park
Project location: North-east Colchester
Development proposal: North-East Colchester proposed development allocation Policy PP9 of the Colchester Preferred Options Local Plan 2025

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DOCUMENT PACK & CONTENTS

Main text

	page
1. Introduction	1
2. Proposed development allocation	2
3. Landscape value	3
4. Landscape sensitivity	12
5. Conclusions	13

Appendices

Appendix A	Policy PP9: North-East Colchester proposed allocation text
Appendix B	LI TGN 02/21 – Assessing landscape value outside of national designations
Appendix C	Web links to Colchester landscape character assessment and related publications
Appendix D	Welshwood Park residents personal accounts summary
Appendix E	Compilation of Welshwood Park valley area photographs

Appendices have colour coded footers.

Figures (separate A3 document)

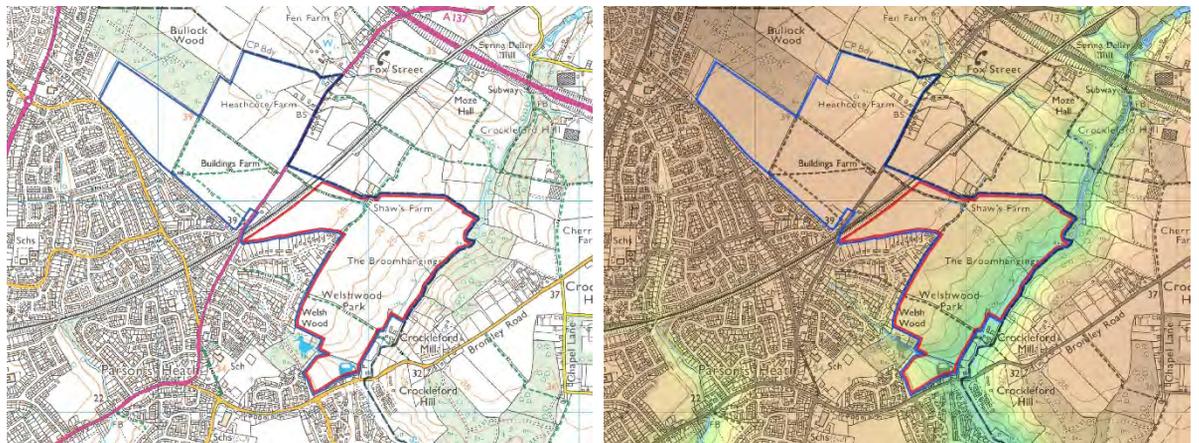
Figure 1	Location map
Figure 2	Aerial photo
Figure 3	Historic map
Figure 4	Landform elevation map
Figure 5	Designations map
Figure 6	District level landscape character map
Figure 7	Salary Brook ALCI proposed extent

Figures are provided as A3 landscape pages (these may be presented as separate pdf documents).

1. Introduction

PURPOSE

- 1.1 Nigel Cowlin Ltd has been appointed by the Welshwood Park Residents' Association to provide an appraisal of the landscape value and landscape sensitivity of land affected by a proposed development allocation bordering the north-east edges of Colchester. The proposed development allocation is defined by Policy PP9 of the Colchester Preferred Options Local Plan Reg 18 Consultation 2025. The part of this proposed allocation of specific concern to the Welshwood Park Residents' Association is the land adjacent to the Welshwood Park residential area. That is most easily described as the land within the part of the proposed allocation that lies south-east of the railway line. The Figures accompanying this report identify the Policy PP9 proposed allocation area as outline in blue, with the area of concern to the residents of Welshwood Park outlined in red.



Extract of Figures 1 & 4

APPROACH

- 1.2 The appraisal of landscape value and landscape sensitivity can be employed at a strategic spatial planning level, or in relation to specific development proposals. Slightly different approaches and methodologies are employed in these different scenarios. At the strategic level these concepts normally form part of an evidence base for plan making and determining the relative favourability of developing one area over another, such as when looking at urban growth options around settlement fringes. In relation to specific development proposals, landscape value and landscape sensitivity are the first evaluation stages in the process of Landscape and Visual Impact Assessment (LVIA) or Landscape and Visual Appraisal (LVA). LVIA/LVA predict and appraise the level and nature of landscape and visual effects that a proposed development would cause in its setting and, as such, they are employed as a tool to help decision makers when appraising the planning merits of a particular development proposal. They are best undertaken as a two stage, or fully iterative process, where early findings can inform the evolution and shaping of a development proposal prior to design fix, and subsequently appraise and present the level and nature of effects that would be brought by the resultant changes should the development go ahead.

- 1.3 In this case, the proposed development is notional, but it relates to a specific location. The proposed allocation also provides guidance and sets requirements for the nature and content of development on this land. The appropriate methodology to employ is therefore that of LVIA/LVA, where landscape and visual baseline factors, such as value and sensitivity, can be highlighted and early development options can be tested against that baseline.
- 1.4 Industry standard guidelines for carrying out LVIA/LVA are contained in two key publications:
- Guidelines for Landscape and Visual Impact Assessment (Third Edition) published by the Landscape Institute and the Institute of Environmental Management and Assessment in 2013 (GLVIA3); and
 - Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) published by the Landscape Institute as Technical Guidance Note LITGN-2024-01 (August 2024).
- 1.5 More specifically, there is supplementary guidance on assessing landscape value:
- Landscape Institute Technical Guidance Note 02/21 'Assessing landscape value outside of national designations' (LI TGN 02/21).
- 1.6 This report is informed by desk and field study carried out and interpreted by a Chartered Landscape Architect experienced in landscape assessment and landscape design issues relating to planning and development.

2. Proposed development allocation

- 2.1 The Colchester Preferred Options Local Plan Reg 18 Consultation 2025 sets out site specific requirements for the North-East Colchester proposed development allocation within its Policy PP9 (this is duplicated as Appendix A). In total this is an area of approximately 100Ha, with around half of that on land to the north-west of the railway line and half on the land around Welshwood Park, to the south of the railway line. The allocation is for approximately 2,000 dwellings together with a new local centre potentially including retail, commercial and community facilities. Notably, this proposed allocation includes an 'enhanced open space' clause, requiring open space within the development to be substantively in excess of 10% of the allocation area. This should be provided in the form of at least one area of strategic open space and multiple areas of less formal and more incidental open space. It also includes clauses requiring buffers to and green corridor links between Bullock Wood SSSI, Welsh Wood and Wall's Wood Local Wildlife Sites (LWS). These are dispersed and situated on opposing edges of the proposed allocation area, with Bullock Wood to the north-west, Welsh Wood to the south-west and Wall's Wood to the east.

- 2.2 Although the above parameters and requirements include some direction in relation to spatial arrangements, there is still great uncertainty about the nature of development changes that would apply to the half of the allocation land south-east of the railway line. However, in order to achieve the quantum of development whilst also accommodating the green space requirements, it seems clear that the built quantum of development could not be wholly accommodated within the north-west half of the land, and it must be assumed that the intention is for some significant built form to also be accommodated within the land to the south-east of the railway line. This appraisal therefore considers the implications of substantive housing development within that zone.

3. Landscape value

THEORY AND PRACTICE FOR LANDSCAPE VALUE

- 3.1 The starting point for LVIA/LVA, when seeking to consider the likely fit and landscape impact of a prospective development, is to understand the baseline landscape environment. Key aspects of this are consideration to the relative value of the local landscape resource that would be affected, and its susceptibility to changes of the nature that would be brought by the development. Value and susceptibility are factors in the overall determination of the sensitivity of the receiving landscape.
- 3.2 Landscape Institute Technical Guidance Note 02/21 'Assessing landscape value outside of national designations' (LI TGN 02/21) provides the latest professional advice on assessing the value of landscape areas (see Appendix B for a copy of LI TGN 02/21). In particular, at Section 2.4 of LI TGN 02/21 it provides guidance on the range of factors that can be considered then identifying landscape value.
- 3.3 In addition to the role of value judgements in relation to the appraisal of the level and nature of landscape effects caused by a development, a judgement of landscape value is of elevated importance in planning decisions because it is given specific treatment in The National Planning Policy Framework (NPPF). The NPPF sets a hierarchy of importance, or weight, to give to the protection of the landscape in planning policies and decisions, based on the recognition of value for any given landscape. NPPF Paragraph 189 sets the highest strand of this with regard to national landscape designations, such as National Parks and National Landscapes:

*'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes, which have the highest status of protection in relation to these issues. ... The scale and extent of development within these designated areas should be limited ...'*¹

¹ NPPF paragraph 189

- 3.4 At the next level of landscape protection, NPPF paragraph 187(a) creates the concept of 'valued landscapes'. This states that in planning policies and decisions 'valued landscapes' should be protected and enhanced:

'Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) *protecting and enhancing valued landscapes ... (in a manner commensurate with their statutory status or identified quality in the development plan);*²

- 3.5 For other landscapes, that fall below a theoretical threshold, such that they are not 'valued landscapes', such as the remainder of the countryside, a default level of protection of the landscape in planning policies and decisions is set by NPPF paragraph 187(b). This states that the intrinsic character and beauty of the countryside should be recognised in planning policies and decisions:

'Planning policies and decisions should contribute to and enhance the natural and local environment by:

- b) *recognising the intrinsic character and beauty of the countryside ...*³

- 3.6 It is commonly recognised that the presence of a local landscape designation is confirmation of a 'valued landscape'. However, local landscape designations have, over the years, come in and out of fashion and planning appeal decisions have set a precedent that for the purposes of NPPF 187(a) a local landscape designation is not necessary for an area to be regarded as a 'valued landscape'. LI TGN 02/21 provides a summary of inspectors decisions of relevance to this matter (see Appendix A5 of LI TGN 02/21 (presented as Appendix B of this report)).

- 3.7 In the absence of, or as supplement to such designations, ideas about landscape value and 'valued landscapes' are often supported by a range of indicative factors. As stated above, LI TGN 02/21 provides the latest professional advice on this matter (see Appendix B). In particular, Appendix A4 of LI TGN 02/21 addresses the issue of identifying 'valued landscapes' in the absence of local designations. This gives the following definition for a 'valued landscape':

*'A 'valued landscape' is an area identified as having sufficient landscape qualities to elevate it above other more everyday landscapes'.*⁴

- 3.8 It also states that a 'valued landscape' would likely have a number of indicators of landscape value, and/or a single indicator of particular importance:

*'It would be expected that a 'valued landscape' would demonstrate the presence of a number of indicators of landscape value, as set out in Table 1, although it is possible for one indicator to be of such importance (e.g. rarity, association or perceptual aspects) that the landscape is judged to be a 'valued landscape' even if other indicators are not present.'*⁵

² NPPF paragraph 187(a)

³ NPPF paragraph 187(b)

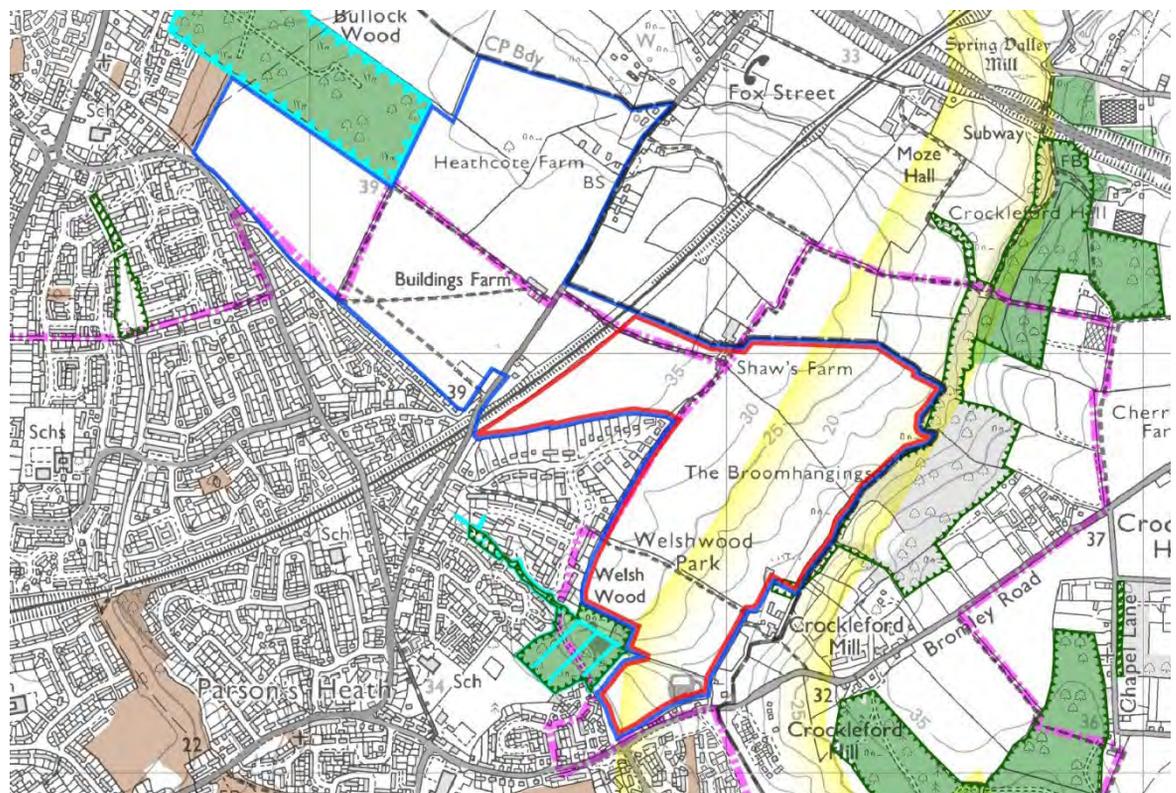
⁴ LI TGN 02/21, page 42, paragraph A4.2.11

⁵ LI TGN 02/21, page 42, paragraph A4.2.12, bullet 3

- 3.9 Accordingly, in the absence of any local landscape designations, it is appropriate to undertake an appraisal of local landscape value, as part of a LVIA/LVA, by following the guidance provided in LI TGN 02/21. Using the LI TGN 02/21 guidance on identifying indicators of landscape value, the profile of findings gives an indication of the relative value of the subject local landscape. Landscapes exhibiting particularly notable qualities in relation to recognised indicators of landscape value and no notable detracting aspects, should be considered high value landscapes and likely candidates, even in the absence of local landscape designation, as 'valued landscapes' for the purposes of NPPF 187(a).

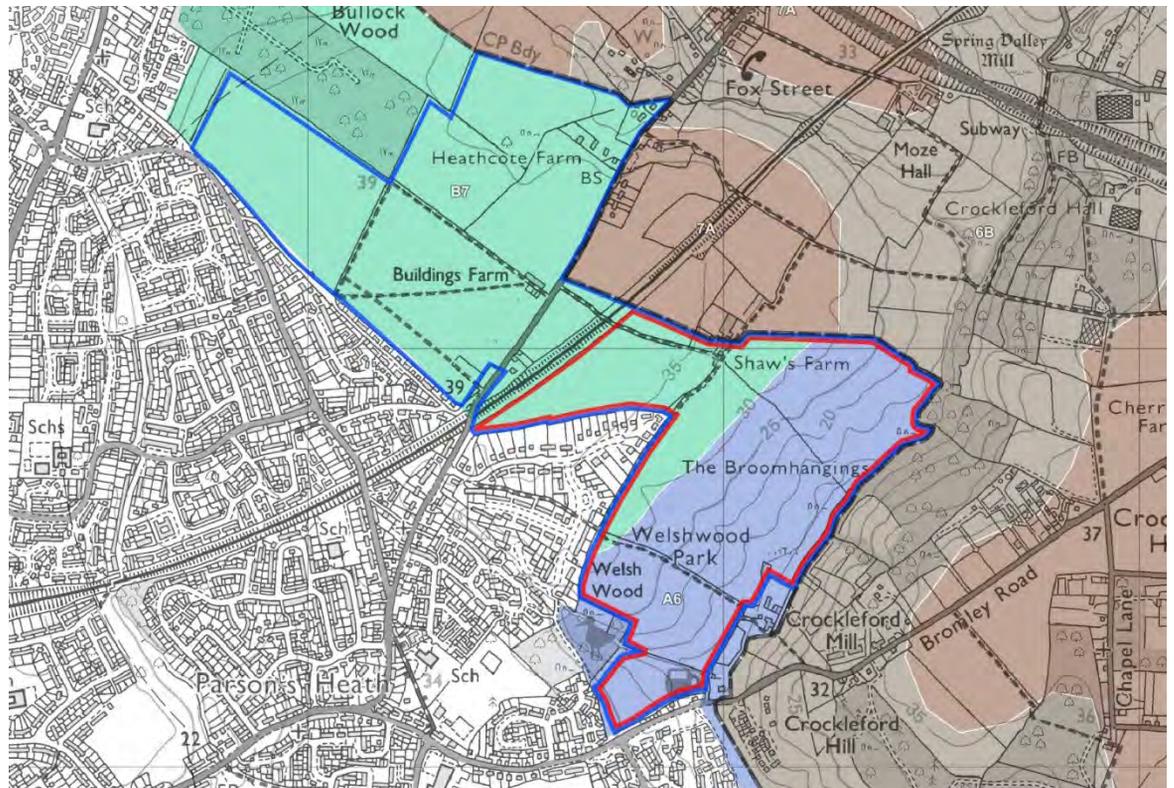
DOCUMENTARY EVIDENCE FOR VALUE OF LANDSCAPE AROUND WELSHWOOD PARK

- 3.10 There is currently no local landscape designation for this area; not in the adopted local plan nor the proposals for a new Colchester local plan.
- 3.11 In earlier iterations of the Colchester local plan, and across Essex, there were local landscape designations. Essex wide they were known as Special Landscape Areas (SLA) and in Colchester they were renamed as Countryside Conservation Areas (CCA). These originated as part of the Essex County Council Countryside Conservation Plan 1985. The valley of Salary Brook was specifically recorded as a SLA by ECC, and it was designated as a CCA by Colchester Borough Council. Although techniques and the burden of evidence for making local landscape designations has evolved considerably since the 1980s, and landscapes may have changed to some degree in the intervening period, this is an early indicator and confirmation that a previous generation found this area to be special. The extent of the old Salary Brook SLA is depicted with a yellow edge on Figure 5. It covers the lower valley corridor of Salary Brook.



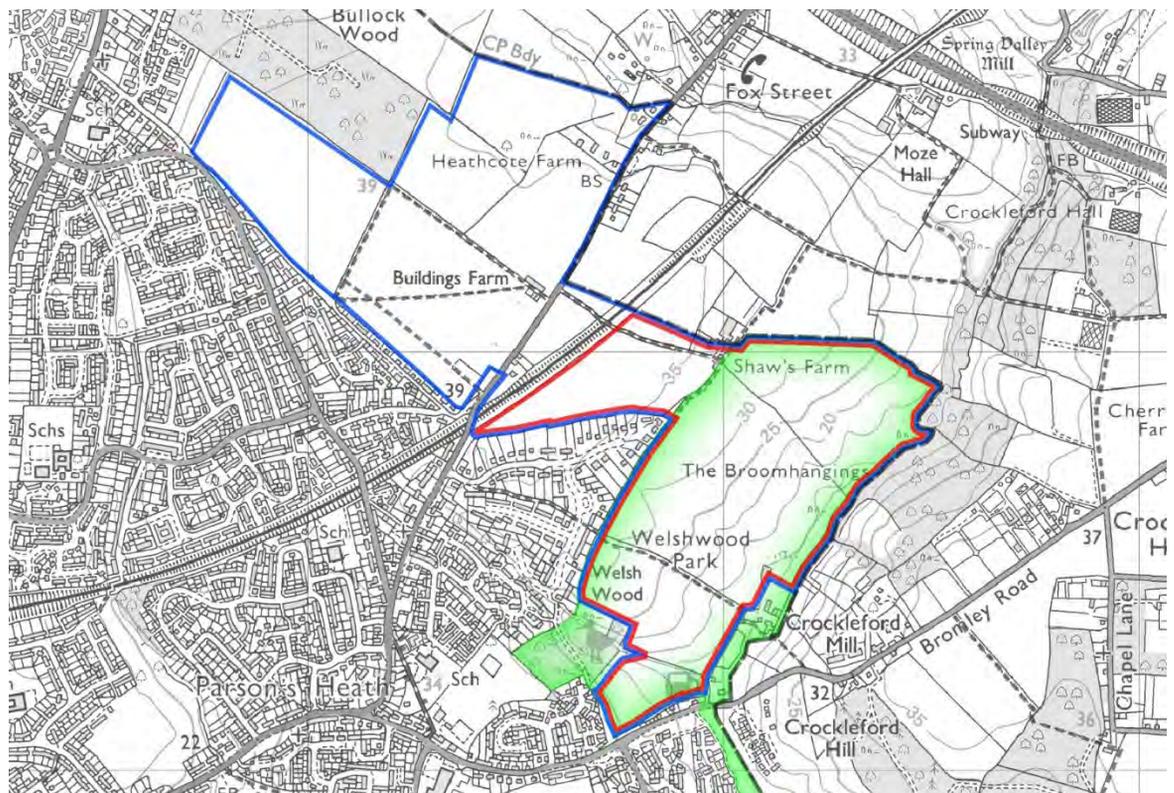
Extract of Figure 5.

3.12 In the early 2000s, the then Colchester Borough Council commissioned a suite of studies looking at landscape character, landscape value and landscape sensitivity and capacity issues for the varied landscapes across the borough. These studies were undertaken by Chris Blandford Associates, with final reports being published in 2005. The resultant Colchester Borough Landscape Character Assessment defined the majority of the land adjacent to the east of Welshwood Park as within Landscape Character Area A6: Ardleigh River Valley. A name that is somewhat confusing, as this is the valley of Salary Brook, but it does start in the vicinity of Ardleigh, to the north. The area adjacent to the north of Welshwood Park is in B7: Langham Farmland Plateau. The chosen dividing line between the two now seems a little unusual as it appears to trace the 30m contour, which is a somewhat arbitrary line in this landscape. It would perhaps be more appropriate to divide between these character areas on the basis of the densely treed field boundary extending from the north-east corner of the Welshwood Park residential area. This is where there is a definitive perceptual break between one landscape area and the next. Mapping of these district level landscape character areas is provided as Figure 6.



Extract of Figure 6.

3.13 Supplementary to the 2005 Colchester Borough Landscape Character Assessment, the associated Review of Countryside Conservation Areas in Colchester Borough provided an updated appraisal of landscape value for landscape in this area. This was intended to replace the work done by ECC in the 1980s and to identify candidate areas for a new generation of local landscape designation, then to be known as Areas of Landscape Conservation Importance (ALCI). This study recorded the valley of the Salary Brook as 'high value' (scale: low, medium, high, very high) and it recommended that it was designated as an ALCI. Whereas, it noted the field north of Welshwood Park and the remainder of the PP9 proposed allocation land, north-west of the railway line, as moderate value. Notably the dividing line was not the 30m contour line as set for the landscape character areas, instead it was the densely treed field boundary, as discussed above. The extent of the then proposed Salary Brook ALCI is marked in green on Figure 7.



Extract of Figure 7.

3.14 In the same tranche of local planning evidence base work in 2005, Chris Blandford Associates also produced a Landscape Capacity of Settlement Fringes Study. This report assessed the potential capacity of the landscapes around settlements to accommodate future strategic development needs in the Borough, taking into account the value of these landscapes and their sensitivity to change. The area around Welshwood Park is divided in two, with the land adjacent to the north being within one defined landscape setting area and the land adjacent to the east being in another. The dividing line between these two landscape setting areas is also the field boundary, rather than the 30m contour. In a table giving a breakdown of assessments for sensitivity and value it records the highest in all respects for the land adjacent to the east, including high landscape value. More mixed results were given for the land adjacent to the north, and the remainder of the PP9 proposed allocation, with the landscape value being recorded as medium for that area. The table below is a reproduction of these ratings:

		Land adjacent to north of Welshwood Park	Land adjacent to east of Welshwood Park
Intrinsic Landscape Qualities	Many	✓	✓
	Some		
	Few		
Contribution to Distinctive Settlement Setting	Very Important		✓
	Partial	✓	
	Very Limited		
Visual Prominence	High		✓
	Moderate		
	Low	✓	
Intervisibility	High		✓
	Moderate	✓	
	Low		
Landscape Sensitivity	High		✓
	Moderate	✓	
	Low		
Landscape Value	High		✓
	Moderate	✓	
	Low		

3.15 In the most recent set of local planning evidence base documents there is a new Colchester Landscape Character Assessment, prepared by LUC, dated November 2024. As well as providing an update to evidence on the break down of landscape character across the borough, Appendix A of this document sets out the findings of LUC on the inherent landscape value of each landscape character area. This study in the main accepted and re-employs the mapping of landscape character areas as set out in the earlier 2005 landscape character assessment. Unfortunately, that included re-using the 30m contour for mapping the division between character areas alongside Welshwood Park. It also only assessed landscape value strictly by landscape character areas. Nevertheless, LUC find that the A6: Ardleigh River Valley (the valley of the Salary Brook) should be considered to be of high landscape value, whereas the B7: Langham Farmland Plateau is noted as medium value. The justification wording given for the high value of the A6: Ardleigh River Valley (the valley of the Salary Brook) is as follows:

*'The LCA has several sensitive attributes and values and overall is considered to have a high value. It comprises the steep sided valley of Salary Brook which provides a distinctive setting to the east of Colchester; scattered habitats, including Ancient Woodland and wetland habitats along the valley floor, provide ecological value and visual interest; a sense of time depth provided by remnant enclosed meadow pasture and pre-18th century irregular fields; and recreational value associated with the PRoW and permissive paths which provide access between the eastern edge of Colchester and the surrounding countryside.'*⁶

3.16 Individually and collectively, these references are all suggesting that the land to the east of Welshwood Park is of high value and capable of being designated a 'valued landscape'. It is merely a technicality, in the drafting of the adopted local plan and proposals for a new Colchester local plan, that provision for local landscape designations have been omitted.

⁶ Colchester Landscape Character Assessment (LUC 2024), page 392

- 3.17 Web links to the above referenced Colchester landscape character assessment and related publications is provided as Appendix C.

SITE SPECIFIC ASSESSMENT OF LANDSCAPE VALUE

- 3.18 Notwithstanding the above documentary evidence, a site specific and more focussed supplementary appraisal of landscape value has been carried out for the local landscape setting of Welshwood Park. This local landscape setting is defined as the parts of the PP9 proposed allocation to the south-east of the railway line, and the adjacent undeveloped parts of the valley of Salary Brook, which are visually contiguous and have a shared sense of location. For this appraisal of landscape value, the approach outlined in LI TGN 02/21 has been followed and is recorded below in table form. This table gives a commentary on indicators of landscape value found in the local landscape setting, using the suggested range of factors set out in LI TGN 02/21. These observations also act as identification of the landscape qualities of the area that are important to maintenance of landscape character, and against which the successfulness of integration of development or other landscape change can be tested.

Indicator factor	observation	contribution
Natural heritage interests	The area contains Walls Wood and Welsh Wood ancient woodlands, on either side and at each end of this section of the valley. These are also Local Wildlife Sites and Welsh Wood is a Local Nature Reserve. There are also historic field hedges with a high density of mature trees, including a number of veteran Oak trees. Salary Brook, though without any designated recognition, is undoubtedly valuable to the local ecosystems, not least as a wet woodland feature within Walls Wood. Within this valley system there are also examples of long term meadow fields, such as those in the valley bottom adjacent to the north of this part of the PP9 proposed allocation.	Major positive
Cultural heritage interests	There are no formally designated heritage assets within this landscape, but it is an area rich with other recorded monuments. These include three recordings of cropmarks in the arable fields on the valley side, one circular feature in the valley bottom, and two fulling mill sites on Salary Brook. Crockleford Mill, though not a Listed Building, is also of local historical note.	Minor positive
Landscape condition	There is some localised modern rationalisation of arable fields on the valley side with loss of some hedged field boundaries, but elsewhere the historic pattern of small scale fields and meadows is evident and gives appreciation of time depth to the landscape. Where field boundaries remain they are in good condition and are noteworthy features. The woodlands are in generally good condition and attractive features.	Positive
Associations	None known.	

Indicator factor	observation	contribution
Distinctiveness	This part of the Salary Brook valley is distinctive as a strongly contained and heavily wooded valley landscape, of quite an intimate scale. It is somewhat of a hidden gem in tight proximity to Colchester urban edge.	Major positive
Recreational opportunities	<p>There is a good network of footpaths giving access into and across this landscape and connecting to further footpath routes into adjacent areas, although the central section of stream corridor is not accessible to the public. It is clearly a popular area for local communities to gain immediate access to rural landscape. Notably, the Colchester Orbital promoted route passes through the area.</p> <p>In addition to these professional observations, during the course of undertaking this study, the local community of Welshwood Park were canvassed for personal accounts relating to their experience and perception of the area. This has been summarised by a member of the Welshwood Park Residents' Association and it is attached as Appendix D, together with a collection of illustrative photographs (most of which are from the residents). In particular, this notes there being many accounts of enjoyment of this landscape with shared experiences across the generations, such as parents watching their children playing in the same lightning or fire damaged old oak tree, that they too played in when they were children. Also, there is reference to this landscape being used in a way that creates the same sense of community that a traditional village green might provide; meeting neighbours on daily walks, stopping to chat and share news.</p>	Major positive
Perceptual appeal (scenic)	The valley scene offers an interesting and varied experience. There are views from the edge of Welshwood Park across an open arable farmland foreground to a heavily wooded valley side scene on the opposite side. There are attractive tree lines along field boundaries and the valley steepens quite dramatically to a relatively tight 'v' shaped valley bottom. The Salary Brook partly traces the edge of the woodlands and in other places runs within the woodland, creating attractive scenes and spaces. Exploration of the valley side woodlands offers attractive contrasts to the more open rural scene. There are also more intimate lower valley side meadow areas to the north, in contrast to the arable fields in the main area.	Major positive

Indicator factor	observation	contribution
Perceptual appeal (wildness & tranquillity)	There is some general background noise intrusion from the A120 and intermittently from the railway line but, nevertheless, this area has an unexpected tranquillity and rurality for being so close to the edges of Colchester. This comes from the fact that nearby developed parts of Colchester are either hidden away from view, or softened within woodland, such as the Welshwood Park area, or are seen as away from and not directly connected with this local valley scene. The steep sided valley and wooded edges are always a factor in this and give a hidden and isolated aspect to the character of this area.	Positive
Functional role	The valley form has a clearly appreciable role in draining the landscape, as does the mass of woodland as providing habitat, oxygenation and as a carbon sink.	Minor positive
Other	-	-

CONCLUSIONS ON LANDSCAPE VALUE

- 3.19 The above record of landscape attributes shows a concentration of notable intrinsic landscape qualities, with few detracting aspects. These attributes and qualities are indicative of elevated landscape value for the Salary Brook valley landscape to the east of Welshwood Park. This is confirmation that this should be regarded as a high value landscape, and it is clear evidence for a judgement that this is a landscape of value elevated above other more everyday landscapes. That is, that it should be regarded as a 'valued landscape' when considering planning policy development and planning decisions. It is a landscape that should be subject to NPPF para 187(a), where protection and enhancement of its particular qualities should be given high regard.
- 3.20 A compilation of photographs, illustrative of the qualities of this landscape, is provided as Appendix E. All of these photos are taken from within the Salary Brook valley landscape to the east of Welshwood Park; many have been provided from Welshwood Park residents' personal collections.
- 3.21 There are two parts of the PP9 allocation area, south-east of the railway line, that are perhaps less integral and more peripheral to the experience of the valued valley landscape described above. These are the field adjacent to the north of Welshwood Park, and the field alongside Bromley Road, to the south. The field north of Welshwood Park is a tapering shape set beyond the brow of the valley side, separated from it by the well treed field boundary that has been used previously as a break between settlement fringe areas and landscape valuation work in the 2005 studies. It is also somewhat tucked in behind Welshwood Park and is tight alongside the railway line. This location does not feel so directly connected to the experience of the valley scene and does not share many of its qualities. The southern field, alongside Bromley Road, is a more direct component of the continuing valley corridor, but this field is more directly alongside and partially framed by development. As a result, it feels less rural. It also has more limited public access opportunities. These two areas should perhaps be regarded in terms of more ordinary landscape value, and not 'valued landscape'.

4. Landscape sensitivity

THEORY AND PRACTICE FOR LANDSCAPE SENSITIVITY

4.1 As noted previously, landscape sensitivity is a key aspect of the baseline landscape environment that must be understood when undertaking LVIA/LVA: considering likely fit and landscape impact of a prospective development. It is common practice to rationalise landscape sensitivity as a function of the relative value of the landscape resource affected and the susceptibility of that landscape to accommodate the types of changes that would result from a development of the nature being proposed. With landscape value being analysed in the section above, that leaves landscape susceptibility as the next key factor to consider.

4.2 The GLVIA3 glossary definition for susceptibility is:

*'The ability of a defined landscape ... to accommodate the specific proposed development without undue negative consequences.'*⁷

4.3 Undue negative consequences is not defined in GLVIA3, but when dealing with landscapes of some elevated value, it seems logical to consider undue negative consequences to come from the compromise of identified landscape qualities, to the extent that devalues the landscape.

4.4 With the analysis of landscape attributes and qualities, as provided in the section above, it would seem quite clear that a development in line with the proposed PP9 allocation would be strongly discordant with the established character of this section of the Salary Brook valley. Development of this nature would greatly interfere with and, in many cases, overwhelm some of the identified aspects of landscape quality. In particular:

- The tranquillity and rurality of this area would be greatly compromised, because development would become the defining feature enclosing the valley side to the west. Even if only a relatively small proportion of the overall development built form were to be accommodated within this part of the Salary Brook valley, this would be in stark contrast to the existing built edges of Colchester being more set back from the steepening valley side and being set behind or embedded within woodland. There is also little prospect of effective mitigation, even if the development were contained to the higher valley sides, with woodland buffers planted around the outer edges. That is because, with new development occupying the higher valley sides, the woodland planting would be on the steepening slope of the valley side, where a greater height difference would require taller growth over a longer time period.
- The scenic appeal would be compromised for similar reasons, but mainly because the openness of the valley scene would be diluted by such development.
- The distinctiveness of the valley scene would be greatly compromised because this relies on the contained and intimate nature of the valley, separate to and with little direct influence from adjacent built development. The intrusion of new development into this landscape would fundamentally undermine this aspect of value.

⁷ GLVIA3 glossary. Page 158

- 4.5 This landscape therefore must be regarded to have a high level of susceptibility to the types of changes that would be brought by expansion of housing development into the valley landscape, as would result from implementation of the proposed PP9 allocation.
- 4.6 As a high value landscape area, in fact a 'valued landscape', and with high level susceptibility to the type of changes that the proposed PP9 allocation would bring, in LVIA/LVA terms of reference, the Salary Brook valley east of Welshwood Park must be found to be of high level sensitivity. In fact, even if only a small degree of development were to extend into this part of the Salary Brook valley, it is likely that the resultant effect would be very harmful to the character and appearance of the local area.
- 4.7 In relation to the two identified parcels which are less integral and more peripheral to the experience of the valued valley landscape, there may be more scope for some development without such levels of landscape harm. However, more detailed and scheme specific LVIA/LVA work would be required to properly inform and appraise those as individual developments.

5. Conclusions

OVERALL CONCLUSIONS

- 5.1 In proposing this area for development, it may be that there is a temptation to think that development here would just be a logical continuation of the model of development on the edges of Colchester in the next part of the Salary Brook valley, to the south. It is correct that housing development along Avon Way and Longridge occupies the same west side of the valley as would be developed adjacent to Welshwood Park with the PP9 allocation. However, this appraisal of landscape value and sensitivity demonstrates that this part of the valley should be considered to be a 'valued landscape' and that it is highly sensitive to intrusion from new housing development. With further development pressure immediately to the east of the valley, from the Tendring Colchester Borders Garden Community, there would seem even greater value to this valley area, as countryside break between settlement areas and to provide a recreational green corridor serving both communities.
- 5.2 The fundamental position should be that: this is a landscape where the housing supply benefits of any development allocation or proposal should be balanced against this as NPPF paragraph 187(a) 'valued landscape'; where the requirement is for planning policies and decisions to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.

APPENDIX A

Policy PP9: North-East Colchester proposed allocation text

Policy PP9: North-East Colchester

In addition to the infrastructure and mitigation requirements identified in Policy ST 7 and subject to compliance with all other relevant policies, development will be supported on land within the area identified on the policies map which provides:

- a) A predominantly residential development including community infrastructure, strategic open space and approximately 2,000 new dwellings of a mix and type of housing to meet evidenced needs which is compatible with surrounding development;
- b) Safe and suitable site access to required highway design standards. The point of vehicular access is to be agreed with the Highway Authority and it will need to be demonstrated that the proposal would not be detrimental to highway capacity and safety;
- c) Provision of active and sustainable travel and passenger transport;
- d) Provision of a new local centre to serve the new and existing local community, this may include provision of retail, commercial and community facilities at an appropriate scale, relevant to the role and function of a local centre and the communities it is intended to serve.
- e) 'Enhanced Open Space' as shown on the Policies Map substantively in excess of 10% of the allocation area must be provided as open space. This should include at least one area of strategic open space and multiple areas of less formal and more incidental open space.
- f) As a strategic site, there is potential for a range of habitat creation measures which should be maximised with regard to the Salary Brook strategic biodiversity area as defined on the policies map. Onsite BNG measures should focus on woodland creation to expand and buffer the SSSI, enhanced connectivity through creation of a green corridor between designated sites, buffers to Welsh Wood and Wall's Wood LoWS, gain in watercourse units, and delivery of a range of habitat creation measures including acid grassland;
- g) Biodiversity mitigation measures must include a buffer to Bullock Wood SSSI, the size of the buffer must be informed by a survey. The watercourse within the site must be protected and buffered. Opportunities should be taken to secure improved management to the SSSI to include protection from recreational disturbance, and connections between the SSSI and Welsh Wood and Wall's Wood LoWS;
- h) Protection of water quality within Salary Brook water course and the conservation and enhancement of its biodiversity value;
- i) Adequate protection of the Ancient Woodland and retention of mature trees and hedgerows within the site;
- j) Tree screening, muted colours and non-reflective surfaces at the edge of the site to help provide mitigation and integration within the landscape;
- k) An active travel plan to be agreed with the Council which ensures site wide active travel connectivity including links beyond the site;
- l) Connectivity with existing Public Rights of Way including connection and enhancement to the Colchester Orbital and connections between the areas of woodland within and adjacent to the site;

- m) Development must conserve, and where appropriate, enhance the significance of heritage assets (including any contribution made by their settings). Designated heritage assets close to the allocated site includes four Grade II Listed Buildings as per the stage 1 HIA;
- n) Liaise with ECC as the Minerals and Waste Planning Authority on mineral and waste matters. A Minerals Resource Assessment as part of any planning application. Should the viability of extraction be proven, the mineral shall be worked in accordance with the scheme/masterplan as part of the phased delivery of non-mineral development;
- o) Development must discharge attenuated surface water to a receiving waterbody and not to the combined sewer network, unless it can be demonstrated that there is no other option;
- p) Demonstrate adequate capacity for managing wastewater including proposed phasing requirements or alternative solutions to the satisfaction of the Council and Anglian Water;
- q) A range of measures in addition to prioritising SuDs (Policy EN8) and water efficiency measures to reduce the risk on impact on the WRC capacity as a result of planned growth including:
 - i) Removal of unrequired network flows;
 - ii) Targeted education to include new residents of the development;
 - iii) Reduction in the demand for potable water.
- r) Any site specific infrastructure requirements from the IDP (to include education provision (2.1ha site for Primary school and Early Years), highway mitigation, water and wastewater and specific community / open space provision);
- s) Before granting planning consent, wintering bird surveys will be undertaken at the appropriate time of year to identify any offsite functional habitat. In the unlikely event that significant numbers are identified, development must firstly avoid impacts. Where this is not possible, development must be phased to deliver habitat creation and management either on or off-site to mitigate any significant impacts. Any such habitat must be provided and fully functional before any development takes place which would affect significant numbers of SPA birds.

Proposals for the allocated site will only be supported where they accord with a comprehensive masterplan in relation to the entire allocation, that has been agreed with the Council prior to submission of any planning application. The masterplan must be of sufficient detail to ensure optimal placemaking and housing delivery outcomes for the allocation and should be informed by an appropriate evidence base. The masterplan should be developed in collaboration with the Council, and relevant infrastructure providers, it should incorporate engagement with the local community and be informed by use of design review. Where appropriate and necessary, the masterplan shall be supported by parameter plans, design codes and/or guidance.

APPENDIX B

LI TGN 02/21 – Assessing landscape value outside of national designations

Web link:

[TGN 02-21: Assessing landscape value outside national designations](#)

APPENDIX C

Web links to Colchester landscape character assessment and related publications

Colchester Borough Landscape Character Assessment (2005)

[CBC Landscape Character Assessment 2005](#)

Review of Countryside Conservation Areas in Colchester Borough (2005)

[Review of Countryside Conservation Areas Final Report August 2005](#)

[Review of Countryside Conservation Areas Fig 1 August 2005](#)

[Review of Countryside Conservation Areas Fig 2 August 2005](#)

Landscape Capacity of Settlement Fringes Study (2005)

[Landscape Capacity of Settlement Fringes 2005](#)

[Landscape Capacity of Settlement Fringes 2005 Figure 1](#)

[Landscape Capacity of Settlement Fringes 2005 Figure 8](#)

Colchester Landscape Character Assessment (2024)

[Colchester Landscape Character Assessment 2024](#)

APPENDIX D

Welshwood Park residents personal accounts summary

Welshwood Area – Resident Evidence on Landscape, Nature and Community Value

Personal connection and community value

Several residents describe living in the Welshwood area for many decades, the longest for over five decades, raising children here and now with grandchildren living locally or visiting. There are many accounts of children exploring the woods and fields that surround the estate and of multi-generational walks in the countryside.

More than one respondent has fond memories of playing in an old oak tree known locally as the lightning or fire tree that is still in situ today near the entrance to the fields from Woodlands. Vivid memories are shared of climbing its sturdy branches, playing in the hollowed trunk, and pretending it was a crow's nest or treehouse.

As the story goes the hollow in the centre of the trunk, used for childhood games, was created by a lightning strike in the 1990s. The oak tree, with its blackened centre, became an exciting place for local children to explore and let imaginations run wild. These memories have been passed down to children today who are also growing up here. They have also delighted in playing in the same old oak tree that sparked imagination all those years before (Ref: Ju G & NH).

These open, natural areas create the same sense of community that a traditional village green provides. You meet neighbours and other residents on your daily walks, stopping to chat and share news. This simple routine helps everyone stay connected and fosters a caring, friendly environment for people of all ages who live here. It's part of what makes the Welshwood area so special — it's not just a place; it's a way of life providing a community hub which is rooted in nature and neighbourliness.

Landscape character and tranquillity.

The Welshwood area is a coherent landscape bowl surrounding Salary Brook and edged by longstanding woodland, many ancient trees, open fields and linked by old hedgerows - the last green corridor of north Colchester. It's not just beautiful to look at, it's a living, breathing place. The landscape changes with the seasons: in spring the wildflowers and blossom brighten the fields, in summer the bees, butterflies, and birdsong make it feel alive, in autumn the trees turn gold and red, and even in winter the stillness has a calm, restorative quality. Early in the mornings, when fog rises off the fields, it creates a unique microclimate that gives moisture to plants, insects, and lichens, and adds to the quiet beauty people love to walk through. (Ref: CF)

Its dark skies and peace form a rare, quiet buffer which can be enjoyed by all the people living locally including residents from the Harwich and Bromley roads and the Roach Vale Welshwood and Greenstead estates.

Building on these fields would fragment the landscape, erode tranquillity, introduce lighting and traffic, and sever the visual link between woods and pasture that makes this place distinctive.

Nature and ancient/veteran trees

The boundary trees and hedgerows include many mature and veteran specimens — irreplaceable habitats protected under national policy. Mature oaks, hawthorns, maples, wildflowers, grasses, and shrubs create a layered habitat for wildlife and add so much to the look and feel of the area. In autumn, the hedgerows are full of rosehips, sloe berries, and blackberries, which feed birds and small mammals as well as shelter from predators and safe places to nest and breed young. Lichens growing on the branches are delicate indicators of ecological health. Development would fragment these habitats and damage the microclimate, putting these species at risk. (Ref: CF)

The National Planning Policy Framework (NPPF) requires refusal of development that would result in the loss or deterioration of ancient woodland or veteran trees unless there are wholly exceptional reasons.

Biodiversity and Local Green Space

“The wildlife here is incredible. We regularly see swifts, crows, blue jays, woodpeckers, magpies, and blackbirds, and we often hear tawny owls at night. Smaller birds like tits and finches flit around the hedgerows, which are also home to dormice, foxes, hedgehogs, and a variety of lichens. The crows often gather in the fields to feed and socialise, which is amazing to watch — it really shows how healthy and productive this area is.” (Ref: CF)

Many residents report seeing wildlife in the area.

“..... woodpeckers and owls to seasonal wildflowers and butterflies. Woodland anemones come up everywhere in spring and are rarely seen elsewhere — and it all forms part of an unbroken green corridor”. (Ref JMc)

“Green woodpeckers, black and white woodpeckers, bats and hedgehogs.” (Ref: NW)

“Foxes, deer, bats and badgers” (Ref: VB)

“Kestrels and the occasional Kite.” (Ref: KS)

“Skylarks, Owls, Hares, Lesser Spotted Woodpeckers, Dragonflies.” (AC)

“As a birdwatcher, watching Redwings in the fields in winter, easily spotted when snow on the ground, harder when not. If disturbed, they would swoop into the trees in our garden till taking off again back to the field. Not so many the last few years but still some. They are amber listed I believe. Fieldfare have also been spotted among them. Buzzards, Red Kites and of course the song of the Skylark and

not forgetting Owls, not always easy to see but can be heard, had one only the other night a Little Owl. For a couple of years, we had a pheasant roost on our garden fence at night, his back protected by a bush. Many years ago, a peacock graced the area and would wander up the drive and into the garden.” (Ref: PA)

While the new Biodiversity Net Gain rules require a 10% uplift, no off-site measure could replicate the mature ecology and character that already exists here. The fields also clearly meet the criteria for Local Green Space designation: they are close to the community, demonstrably special, and local in character.

Physical and Mental Well Being

Beyond the environmental impact, this area provides enormous benefits to residents' mental and physical wellbeing. People of all ages, ranging from families with very young children to the elderly, often walk through Welshwood Park and across the fields and through the wood. It's a place where children can explore and play safely, where people can enjoy the fresh air, and where everyone can reconnect with the natural cycle of seasons, wildlife, and farming — a kind of “forest bathing” that is increasingly recognised by doctors who prescribe time in nature to improve mental health. Losing this space would further alienate us from nature. (Ref: CF)

“During the lovely summer, it was noticeable many young teenagers have cast away their phones in favour of a good healthy walk” (Ref: TF)

“I am aged but need to keep active both for social contact and (to maintain my) fitness. I walk there frequently” (Ref: CR)

“It can be said that our valley provides the “lungs” for the area, promoting both physical and mental health benefits to the many country walkers, both with or without dogs, runners and walking and running groups together with the occasional cyclist.” (Ref: JG)

Food Production and Sustainable Farming

These fields also play an important role in local food production providing crops, usually twice a year, which add to the nation's food security. If the farmer is no longer able to grow crops because of development, we risk losing part of our rural sustainability and our link to local food sources. (Ref: CF & JG)

“I have seen rape seed, wheat, beans, set aside and (in years gone by) fields of blue flax.” (Ref: TF)

History

Colchester was the Roman capital of England and the fields surrounding Welshwood Park were used for Roman encampments. This can be evidenced by the finds of metal detectorists that have worked the fields after ploughing over the years. They have found coins, jewellery, swords, daggers and other military artefacts. A company

even offers holidays to Americans to come over, and metal detect on these fields most recently being the field that runs across to the railway line in front of Shaws Farm. So much of Roman Colchester has already been built on. (Ref: NH)

Request

We therefore ask that the Welshwood area fields be removed from allocation in the Local Plan and instead recognised and protected for their landscape, biodiversity and community value. It would be a real shame if current and future occupants of Welshwood were denied the peace, beauty and sense of community that generations before them have enjoyed.

This evidence is presented based on a submission and template provided by Julia McCrae (resident) and is supported by written statements from sixteen other residents. In addition, 175 photographs were submitted from which a selection was made to support the narratives in the following categories: Biodiversity; Landscape character and tranquillity; Nature and ancient/veteran trees and Personal connection and community value.

Jennie Fisher

On behalf of the residents of Welshwood Park

APPENDIX E

Compilation of Welshwood Park valley area photographs







FIGURES

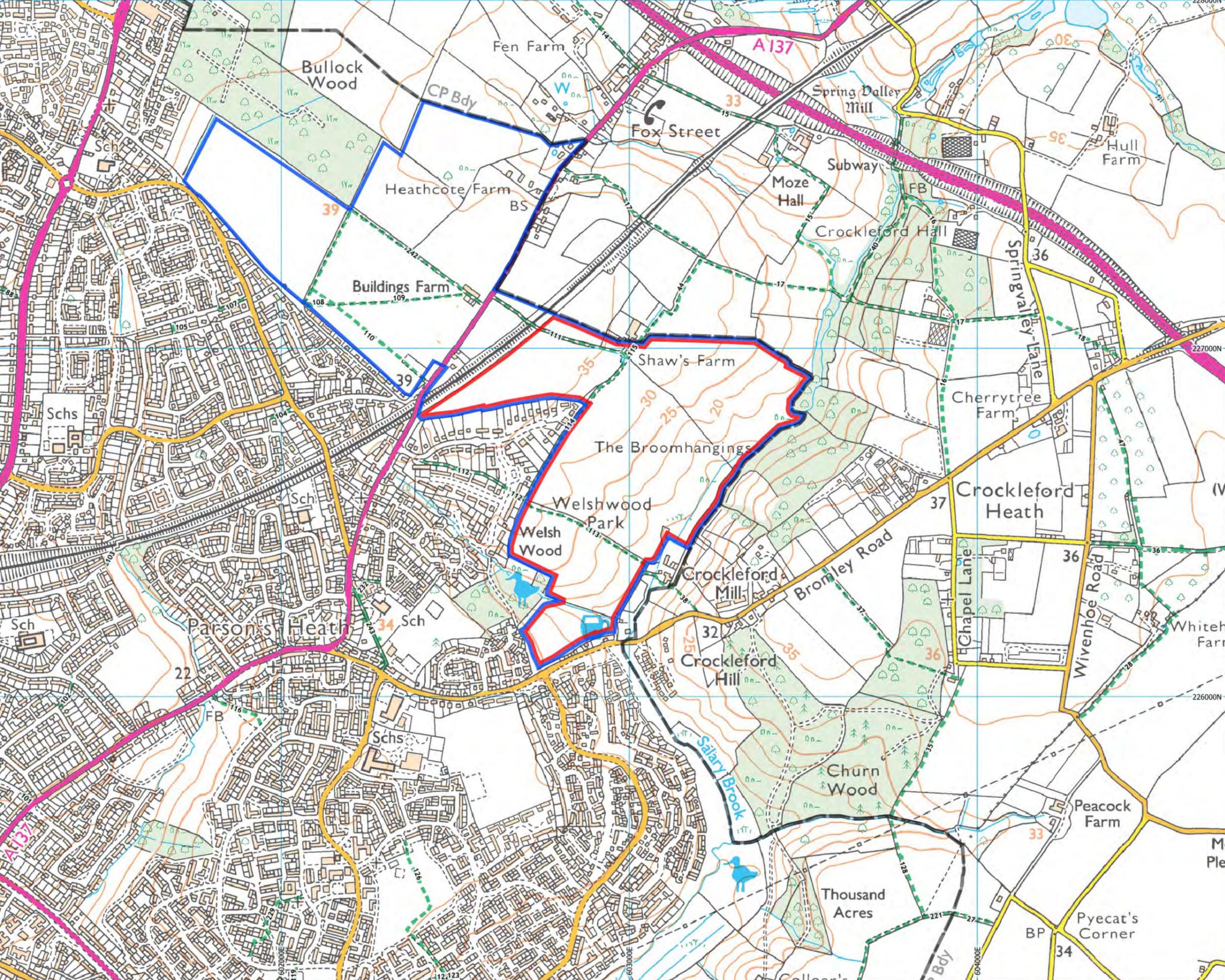
Figures

- Figure 1 Location map
- Figure 2 Aerial photo
- Figure 3 Historic map
- Figure 4 Landform elevation map
- Figure 5 Designations map
- Figure 6 District level landscape character map
- Figure 7 Salary Brook ALCI proposed extent

Figures are provided as A3 landscape pages (these may be presented as separate pdf documents).

KEY:

-  LPA boundaries
-  Policy PP9: proposed allocation
-  Area of concern to Welshwood Park Residents' Association



LOCATION MAP

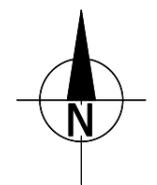
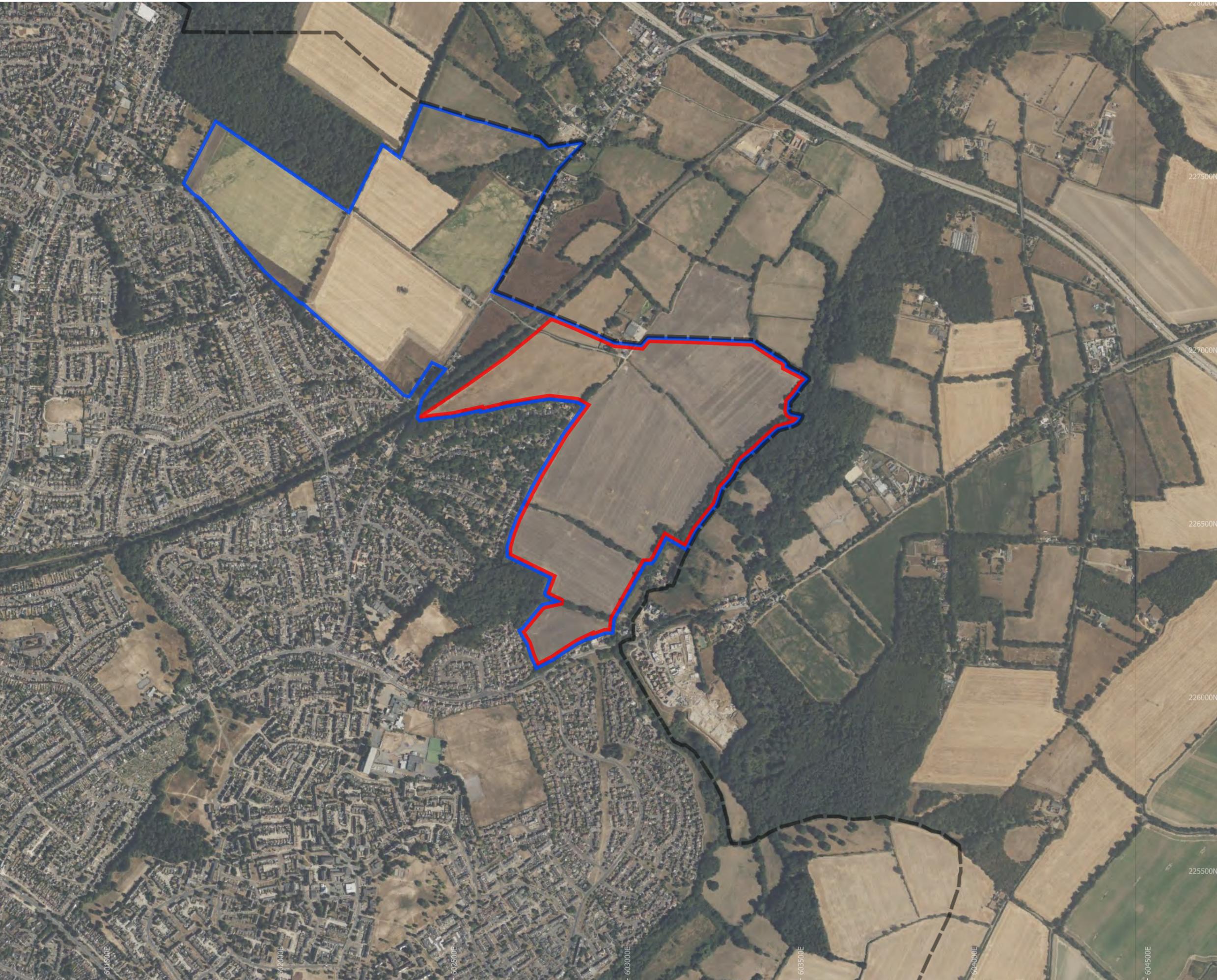
Welshwood Park
Colchester

NC25.938-lva01_Part 2_figures

FIGURE 1.

KEY:

-  LPA boundaries
-  Policy PP9: proposed allocation
-  Area of concern to Welshwood Park Residents' Association



AERIAL PHOTO

Welshwood Park
Colchester

NC25.938-lva01_Part 2_figures

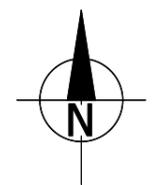
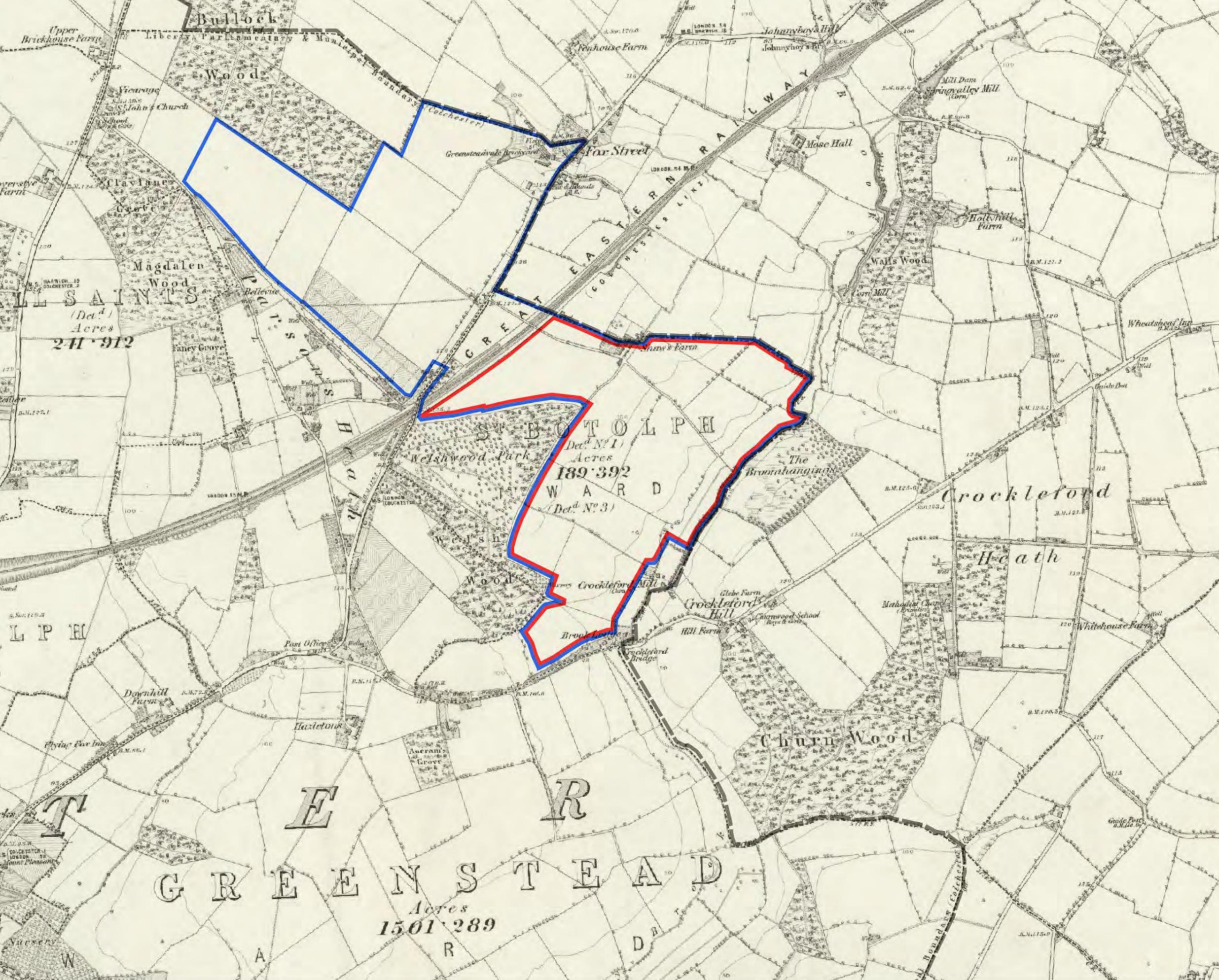
FIGURE 2.



Scale 1:10,000 @ A3

KEY:

-  LPA boundaries
-  Policy PP9: proposed allocation
-  Area of concern to Welshwood Park Residents' Association

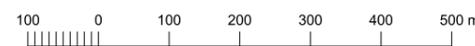


HISTORIC MAP
OS Six Inch 1830s - 1880s

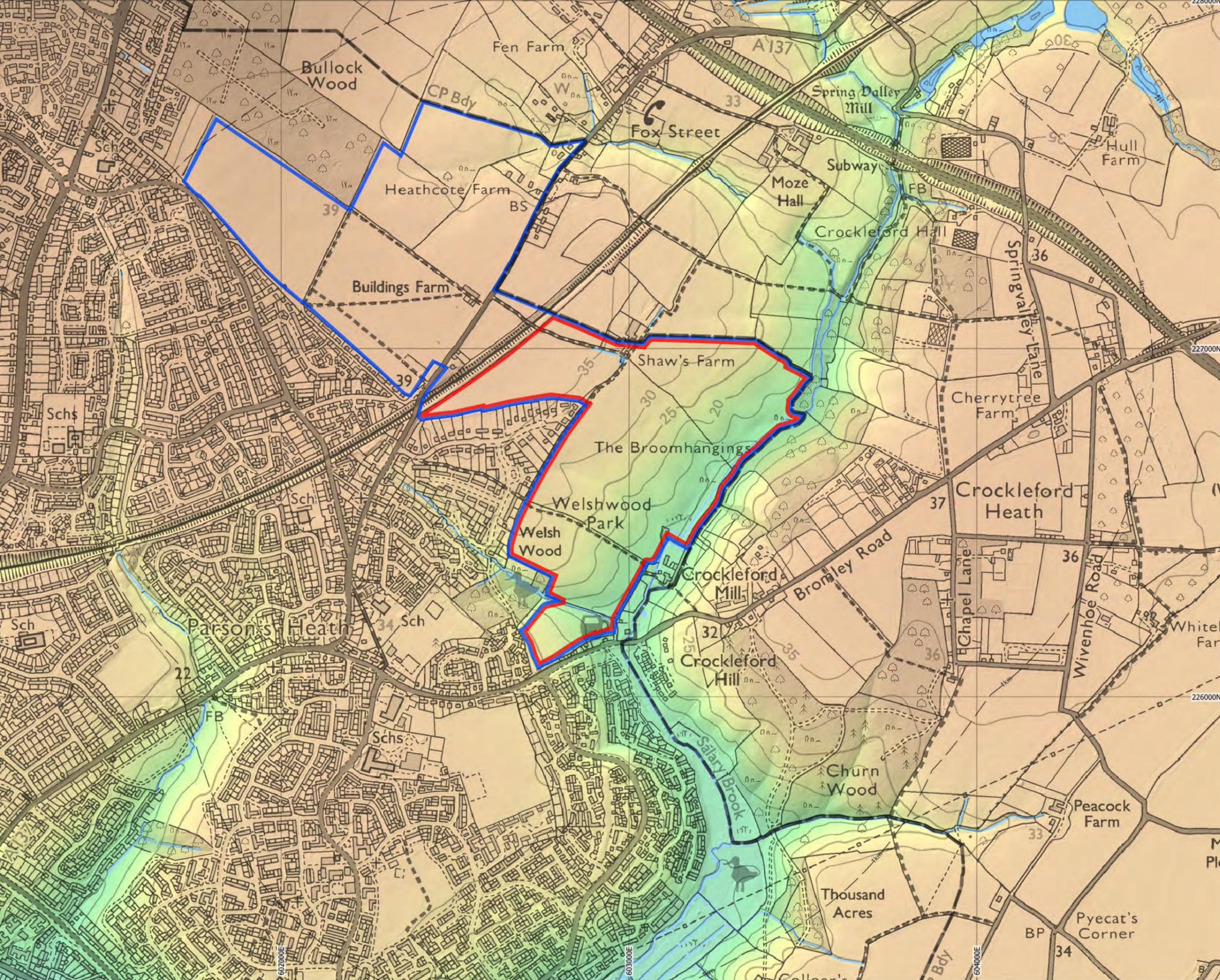
Welshwood Park
Colchester

NC25.938-lva01_Part 2_figures

FIGURE 3.



Scale 1:10,000 @ A3



KEY:

-  LPA boundaries
-  Policy PP9: proposed allocation
-  Area of concern to Welshwood Park Residents' Association
-  Water body
-  60m
0m

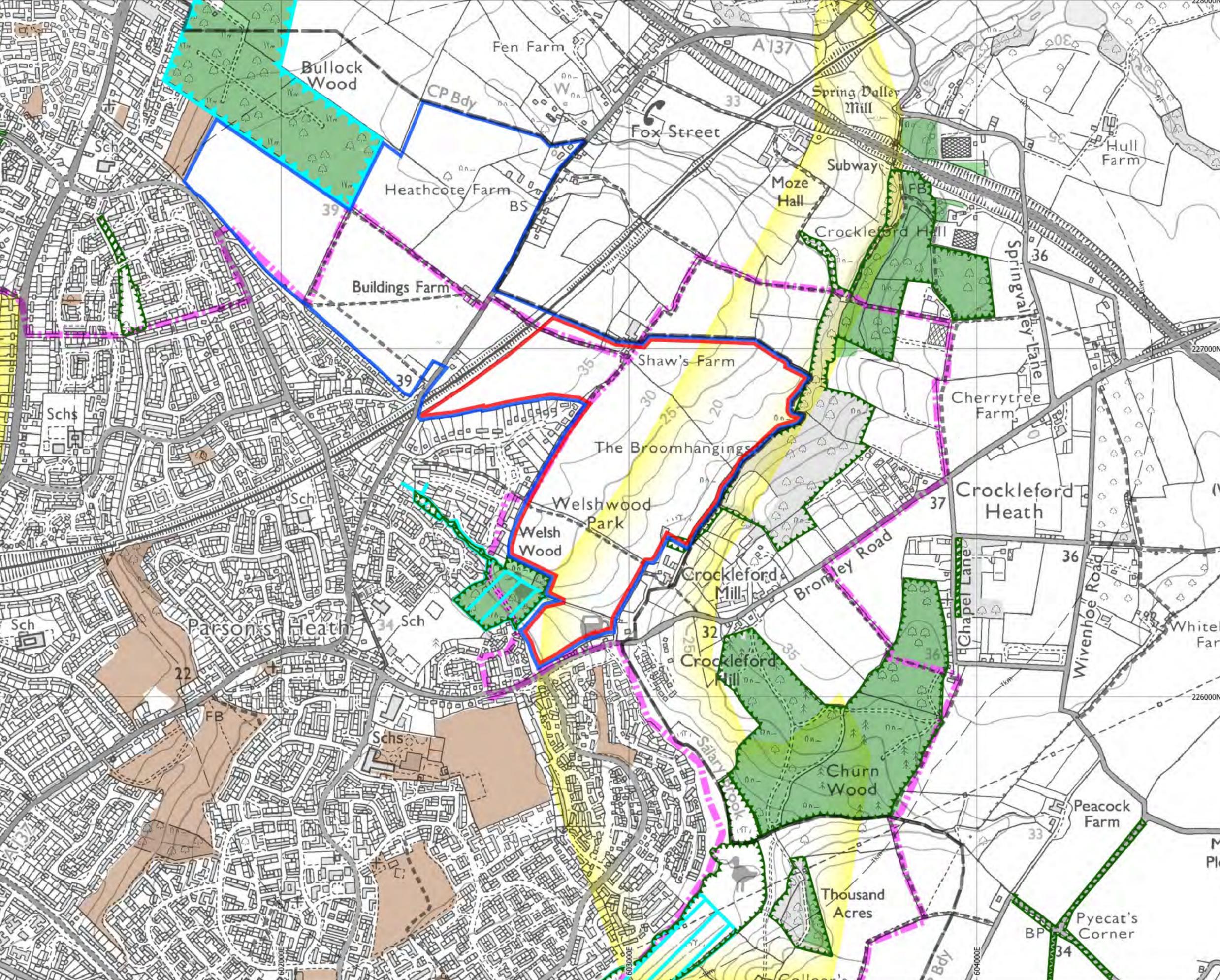


LANDFORM ELEVATION MAP

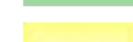
Welshwood Park
Colchester

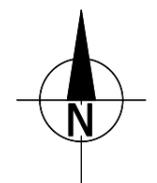
NC25.938-lva01_Part 2_figures

FIGURE 4.



KEY:

-  LPA boundaries
-  Policy PP9: proposed allocation
-  Area of concern to Welshwood Park Residents' Association
-  SSSI
-  Local Nature Reserve (LNR)
-  Local Wildlife Sites
-  Ancient Woodland
-  Special Landscape Area (defunct policy)
-  Recreational open space (various categories)
-  Colchester Orbital



DESIGNATIONS MAP

Welshwood Park
Colchester

NC25.938-lva01_Part 2_figures

FIGURE 5.

KEY:

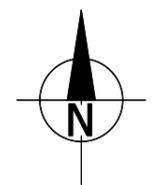
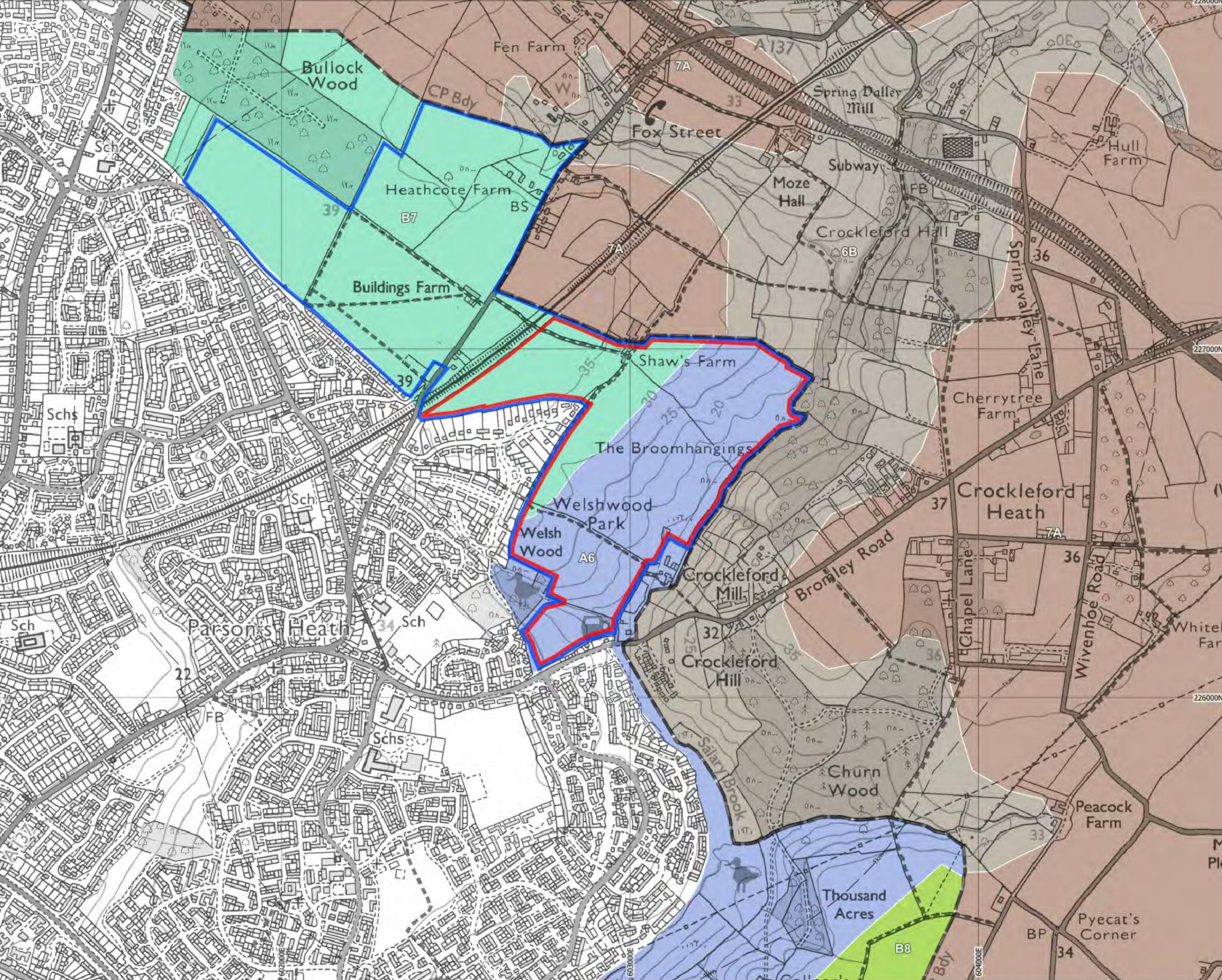
- LPA boundaries
- Policy PP9: proposed allocation
- Area of concern to Welshwood Park Residents' Association

Colchester LCA

- A6 Arleigh River Valley
- B7 Langham Farmland Plateau
- B8 Southern Colchester Farmland Plateau

Tendring LCA

- 6B Arleigh Valley System
- 7A Bromley Heaths



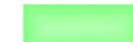
**DISTRICT LEVEL
LANDSCAPE CHARACTER
MAP**

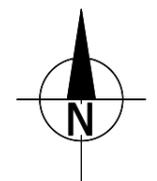
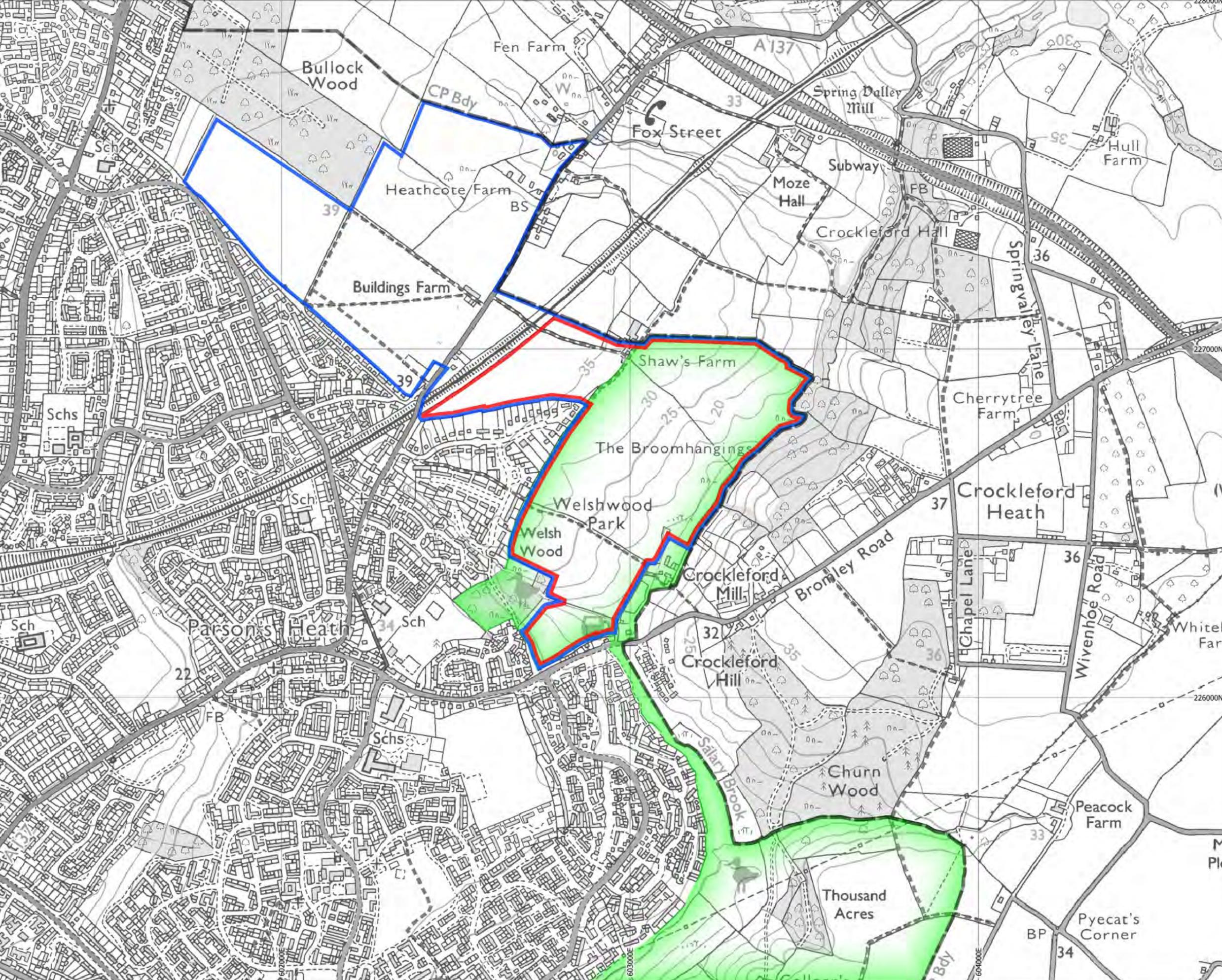
Welshwood Park
Colchester

NC25.938-lva01_Part 2_figures

FIGURE 6.

KEY:

-  LPA boundaries
-  Policy PP9: proposed allocation
-  Area of concern to Welshwood Park Residents' Association
-  ALCI proposed extent 2005



SALARY BROOK ACLI PROPOSED EXTENT

Welshwood Park
Colchester

NC25.938-lva01_Part 2_figures

Appendix 5





Sibbett Ecology

A boutique ecology micro-consultancy

Ecological Appraisal
Policy PP9, North-East Colchester
Colchester Local Plan Reg 18 consultation
December 2025



Client: Welshwood Park Residents Association

Report version: 2

Report status: Issue

Sibbett Ecology Ltd

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Quality assurance

Project:	Welshwood Park
Project No:	072
Report title:	Ecological Appraisal of Policy PP9, North-East Colchester Colchester Local Plan Reg 18 consultation
Status:	Issue
Date of last revision:	9 th December 2025

This report has been prepared in compliance with

- The industry-wide standards for report-writing, as described in the report ‘Guidelines for Ecological Report Writing’ 2nd edition, by Chartered institute of Ecology and Environmental Management (2017).
- The Code of Professional Conduct of the Chartered institute of Ecology and Environmental Management (April 2025)
- BS 42020:2013 ‘Biodiversity – code of practice for planning and development’

Version	Author	Reviewer	Approved
	Nick Sibbett CEcol MCIEEM CEnv	Vicky Rusby ACIEEM	Nick Sibbett CEcol MCIEEM CEnv
1	17 th November 2025	19 th November 2025	24 th November 2025
2	4 th December 2025		9 th December 2025

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Summary

1. Sibbett Ecology was commissioned by Welshwood Park Residents' Association to carry out an Ecological Appraisal of land within Policy PP9, North-East Colchester, as proposed in the emerging Colchester Local Plan, Regulation 18 consultation. The purpose is to understand if there are any ecological constraints to the proposed policy allocation not previously recognised by the Council, and if the allocation would be ecologically acceptable. The Welshwood Park Residents' Association is particularly concerned with the part of the proposed allocation east and south of the London – Norwich railway line
2. The part of proposed policy PP9 allocation east and south of the London – Norwich Railway line contains veteran trees which are irreplaceable habitat, and is adjacent to Welsh wood (statutory Local Nature Reserve, ancient woodland, Local Wildlife Site of county importance), Wall's Wood (Local Wildlife Site of county-wide importance, part ancient) and a small remnant historic parkland (qualifies as Local Wildlife Site). Veteran trees and woodland would be harmed by increased trampling, arson and vandalism, damage to vegetation interest in its own right and also supporting important invertebrate species, and public pressure for removal of valuable dead wood.
3. The proposed allocation fails the Council's own sustainability assessment for impacts on woodland after mitigation is applied, even without it considering impacts on veteran trees or remnant historic parkland. It fails emerging Policy EN3, because impacts cannot be satisfactorily mitigated, and it fails emerging Policy EN4 because the impacts are on irreplaceable habitats (ancient woodland, veteran trees) which cannot be satisfactorily mitigated.
4. **I conclude that the allocation of land east and south of the London – Norwich railway line is ecologically unacceptable and should be removed from the emerging Local Plan.**

Contents

1. Introduction	1
Commissioning client, site name and purpose of report.....	1
Site context and description	1
The proposed policy allocation	1
Previous studies by the City Council	3
Designated sites in Planning	3
Competencies	3
Acknowledgements.....	4
2. Ecological Features present / adjacent and potential impact	5
Veteran trees.....	5
Welsh Wood Local Nature Reserve / Local Wildlife Site / ancient woodland.....	6
Additional remnant of Welsh Wood / Welshwood historic parkland	7
Wall's Wood Local Wildlife Site	8
Protected species	8
Hedgerows	8
Ecology Constraints Plan	9
3. Review of Local Plan documents	10
Council's Sustainability Assessment.....	10
Assessment of Policy PP9 against Policy EN3: Biodiversity and Geodiversity.....	10
Assessment of Policy PP9 against Policy EN4: Irreplaceable Habitats	11
4. Conclusion	12

Figures

1. Veteran tree damaged by arson
2. Veteran coppice stools
3. Welsh Wood, 1800s - 1860
4. Welsh Wood trampling damage
5. Remnant historic parkland
6. Ecological constraints to development

Appendices

1. Location of allocation and land of concern to the Residents' Association
2. Designated Sites in Planning
3. Ancient Woodland
4. Local Wildlife Sites
5. Local Nature Reserves

1. Introduction

Commissioning client, site name and purpose of report

- 1.1 Sibbett Ecology was commissioned by Welshwood Park Residents' Association to carry out an Ecological Appraisal of land within Policy PP9, North-East Colchester, as proposed in the emerging Colchester Local Plan, Regulation 18 consultation. The purpose is to understand if there are any ecological constraints to the proposed policy allocation not previously recognised by the Council, and if the allocation would be ecologically acceptable. The Welshwood Park Residents' Association is particularly concerned with the part of the proposed allocation east and south of the London – Norwich railway line as shown in Appendix 1 (drawings kindly provided by Nigel Cowlin Ltd).
- 1.2 An absence of comment on the part of the allocation west and north of the railway line does not imply that there would be no harm to ecological features caused. Impacts there have not been assessed in this report.

Site context and description

- 1.3 The site of concern (Appendix 1, sample adjacent postcode is CO4 3HZ) was visited by the report author with some members of the Residents' Association on 24th September 2025. I walked along footpaths and publicly accessible land such as Welsh Wood Local Wildlife Site. I also saw that other field boundaries were well-used by the public for dog walking where no right-of-way existed. I found that the site comprises three complete arable fields and part of a fourth arable field, a species-poor grassland field and part of a second grassland field. The land generally slopes down to Salary Brook. Historic hedgerows with veteran trees divide the arable fields, with the western site boundary being the south-facing slope of the railway embankment. Welsh Wood, a remnant of a larger ancient woodland and designated as a Local Nature Reserve / Local Wildlife Site, is present adjacent to the southern boundary. Walls Wood, partly ancient, is adjacent to the eastern boundary.

The proposed policy allocation

- 1.4 Policy PP9 North Colchester is long and complex. It is given below.

PP9: North-East Colchester

In addition to the infrastructure and mitigation requirements identified in Policy ST7 and subject to compliance with all other relevant policies, development will be supported on land within the area identified on the policies map which provides:

a) A predominantly residential development including community infrastructure, strategic open space and approximately 2,000 new dwellings of a mix and type of housing to meet evidenced needs which is compatible with surrounding development;

b) Safe and suitable site access to required highway design standards. The point of vehicular access is to be agreed with the Highway Authority and it will need to be demonstrated that the proposal would not be detrimental to highway capacity and safety;

c) Provision of active and sustainable travel and passenger transport;

d) Provision of a new local centre to serve the new and existing local community, this may include provision of retail, commercial and community facilities at an appropriate scale, relevant to the role and function of a local centre and the communities it is intended to serve.

e) 'Enhanced Open Space' as shown on the Policies Map substantively in excess of 10% of the allocation area must be provided as open space. This should include at least one area of strategic open space and multiple areas of less formal and more incidental open space.

f) As a strategic site, there is potential for a range of habitat creation measures which should be maximised with regard to the Salary Brook strategic biodiversity area as defined on the policies map. Onsite BNG measures should focus on woodland creation to expand and buffer the SSSI, enhanced connectivity through creation of a green corridor between designated sites, buffers to Welsh Wood and Wall's Wood LoWS, gain in watercourse units, and delivery of a range of habitat creation measures including acid grassland;

g) Biodiversity mitigation measures must include a buffer to Bullock Wood SSSI, the size of the buffer must be informed by a survey. The watercourse within the site must be protected and buffered. Opportunities should be taken to secure improved management to the SSSI to include protection from recreational disturbance, and connections between the SSSI and Welsh Wood and Wall's Wood LoWS;

h) Protection of water quality within Salary Brook water course and conservation and enhancement of its biodiversity value;

i) Adequate protection of the Ancient Woodland and retention of mature trees and hedgerows within the site;

j) Tree screening, muted colours and non-reflective surfaces at the edge of the site to help provide mitigation and integration within the landscape;

k) An active travel plan to be agreed with the Council which ensures sitewide active travel connectivity including links beyond the site;

l) Connectivity with existing Public Rights of Way including connection and enhancement to the Colchester Orbital and connections between the areas of woodland within and adjacent to the site;

m) Development must conserve, and where appropriate, enhance the significance of heritage assets (including any contribution made by their settings). Designated heritage assets close to the allocated site includes four Grade II Listed Buildings as per the stage 1 HIA;

n) Liaise with ECC as the Minerals and Waste Planning Authority on mineral and waste matters. A Minerals Resource Assessment as part of any planning application. Should the viability of extraction be proven, the mineral shall be worked in accordance with the scheme/masterplan as part of the phased delivery of non-mineral development;

o) Development must discharge attenuated surface water to a receiving water body and not to the combined sewer network, unless it can be demonstrated that there is no other option;

p) Demonstrate adequate capacity for managing wastewater including proposed phasing requirements or alternative solutions to the satisfaction of the Council and Anglian Water;

q) A range of measures in addition to prioritising SuDs (Policy EN8) and water efficiency measures to reduce the risk on impact on the WRC capacity as a result of planned growth including:

i) Removal of unrequired network flows;

ii) Targeted education to include new residents of the development;

iii) Reduction in the demand for potable water.

r) Any site specific infrastructure requirements from the IDP (to include education provision (2.1ha site for Primary school and Early Years), highway mitigation, water and wastewater and specific community / open space provision);

s) Before granting planning consent, wintering bird surveys will be undertaken at the appropriate time of year to identify any offsite functional habitat. In the unlikely event that significant numbers are identified, development must firstly avoid impacts. Where this is not possible, development must be phased to deliver habitat creation and management either on or off-site to mitigate any significant impacts. Any such habitat must be provided and fully functional before any development takes place which would affect significant numbers of SPA birds.

Previous studies by the City Council

- 1.5 The site of concern is described as two separate sites in the Colchester City Council *Emerging Allocations Biodiversity Assessment* (November 2024) as Welshwood Park, no reference number (page 8) and Land north of Bromley Road, Colchester, site reference 10616. Together the sites wrap around the existing residential area of Welshwood Park, which includes Welshwood Park Road and Woodlands Road. The two sites share a common hedgerow boundary and here are treated as one 'combined site' except where indicated.
- 1.6 The methodology in the City Council's Assessment did not permit site visits to enable the assessment. Instead it used aerial photographs and 'street side images' and the limitation of this is recognised in the report. These limitations mean that the ecological value of the site of concern has not been fully recognised by the Council. My visit enabled me to consider the ecological value of the site in a way which would not be possible from aerial photos, and I also obtained data from Essex Field Club to further understand the ecological value of the site.

Designated sites in Planning

- 1.7 There are several different ecological designations which may have been applied to areas of land. These are called 'designated sites'. The protection given to designated sites varies with the type of designation. A description of the designated sites typically found on or near some development sites is given in Appendix 2.

Competencies

- 1.8 Nick Sibbett is a Chartered Ecologist (CEcol), a Chartered Environmentalist (CEnv) and a full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). He holds various licences from Natural England, including for bat survey (level 2, CL18), barn owl survey (CL29), great crested newt survey (CL08), and he has held mitigation licences for development projects where mitigation licences were obtained for badgers, bats and great crested newts.
- 1.9 He worked for English Nature, which became Natural England in 2006, in its Suffolk office for seventeen years from 1991 to 2008. He was then in practice with The Landscape Partnership from March 2008, where he was promoted to Associate Director. He led the company's ecology team across the practice. In August 2024 he set up his own company, Sibbett Ecology Ltd, to deliver ecological consultancy.

- 1.10 Nick Sibbett has given evidence to a number of Local Plan Examinations, Appeal Hearings and Public Inquiries, for Local Planning Authorities, developers and for Rule 6 parties / interested parties, including Public Inquiries regarding enforcement appeals.
- 1.11 He has a wide range of experience in the field of ecology, and in particular in habitat survey, the conservation and management of designated sites, Ecological Impact Assessment and Habitats Regulations Assessment
- 1.12 The reviewer was Vicky Rusby ACIEEM, ecological consultant and director at 360 Ecology Ltd with 8 years' experience as an ecologist. Vicky has completed training for biodiversity net gain assessments and is considered a competent assessor. The review was to provide advice to the report author only, and the author decides how to use that advice. The reviewer therefore has no legal responsibility for the published report.

Acknowledgements

- 1.13 Useful discussions were held with the client team members, regarding the proposed development and potential impacts. Nigel Cowlin kindly agreed for two of his Figures to be reproduced as Appendix 1. Fiona Bradshaw discussed the results of her tree survey.

2. Ecological Features present / adjacent and potential impact

Veteran trees

- 2.1 There are several veteran pollarded trees and veteran coppice stools, in hedges across and bounding the combined site. Two veteran trees have been recognised by the Woodland Trust and others are successor veteran trees¹ which are borderline veteran now, forming the next cohort of veteran trees in the future. At least one has been harmed by arson (Figure 01). There also at least two veteran coppice stools. A veteran oak coppice stool remains as a ring of relatively young shoots, with the stool itself completely decayed above ground with presumed connections remaining below ground level. A second veteran coppice stool, or possibly a veteran laid hedge shrub (it may have undergone both management techniques in its long life) is present in a hedge leading south from Shaw's Farm (Figure 02). Other parts of the site, away from public rights of way, have not been formally surveyed and more veteran trees / coppice stools might be present.
- 2.2 Their position in the landscape just 2km north of the nationally important assemblage of veteran trees at Wivenhoe Park means that there is a high likelihood of saproxylic species (e.g invertebrates, fungi) forming metapopulations using both the combined site and Wivenhoe Park. This would be a strong connection between the veteran trees of the combined site and Wivenhoe Park.
- 2.3 Veteran trees qualify for selection as a Local Wildlife Site, according to the *LOCAL WILDLIFE SITE SELECTION CRITERIA* produced by the Essex Local Wildlife Sites Partnership and published by Essex Wildlife Trust (January 2016). Habitat Criterion 6 (HC6) – Veteran Trees is *Veteran trees known or suspected to be of specific nature conservation interest, for example supporting significant invertebrate assemblages, and/or epiphytic bryophytes and lichens, will be eligible for selection, even in the absence of other associated semi-natural habitat. The tree or tree group should encompass a sufficient area with appropriate habitat conditions for the associated species interest to be maintained*
- 2.4 The number of veteran trees (including veteran coppice stools) and the likelihood they contain significant invertebrate assemblages or fungal species means that the site of concern is eligible for selection as a Local Wildlife Site, of County-wide value. Veteran trees are irreplaceable.
- 2.5 Even with a vegetated buffer, the veteran trees and veteran coppice stools are likely to be harmed by residential development on the site. Harm may take some years or decades to be expressed, but even a few decades is a small proportion of the life of a veteran tree. Harms include
- Public pressure for safety pruning of dead wood, resulting in the loss of value
 - Arson and vandalism; evidenced by the existence of arson even though the trees are outside residential areas
 - Soil changes resulting in growth problems and habitat degradation; compaction from people on foot, chemical eutrophication from dog and cat waste, and application of fertiliser and herbicide by well-meaning but ignorant residents
 - Loss of semi-natural plants / hedge base habitat in the hedge line which provide nectar for veteran tree invertebrates, by trampling, inappropriate mowing, removal of dead wood, or by unauthorised gardening by residents;

¹ Sylva Consultancy (December 2025) Arboricultural report Land to the east of Welshwood Park Road CO4 3JA

- Air quality degradation potentially leading to loss of lichen or fungal species and associated obligate invertebrates
- 2.6 A buffer would need to be sufficiently large that impacts from the public can be excluded; any accessible greenspace will encourage residents towards the veteran trees where the various harms discussed above will be caused. Natural England's People and Nature Survey² found that 74% of adults visited a green space up to 5 minutes walk away, within the 14 days prior to the survey. Even with a walk distance to the greenspace being 6 – 15 minutes away, 68% of adults visited a greenspace in the 14 days prior to the survey. This indicates that even if the buffer is big enough to need a walk of 15 minutes to reach the veteran trees, a high visitor pressure would arise from the proposed allocation. Even if 'only' half the allocation was within 15 minutes, with 1000 dwellings supporting a population of 2around 400 people, a visitor pressure of 68% of people (1632 people) would visit at least once every two weeks. And there would also be visits by people over 15 minutes walk away, albeit with a lower frequency. A buffer of up to 1km from the nearest dwelling could well be insufficient to prevent harm from the allocation.
- 2.7 Colchester City Council *Emerging Allocations Biodiversity Assessment* (November 2024) gave a harm score to Welshwood Park, no reference number (page 8) and Land north of Bromley Road, Colchester, site reference 10616. Had the report author been aware of the veteran trees (including veteran coppice stools) in the site, the harm score would have been upgraded to 'Significant harm' using the criteria on pages 3 and 4 of the Assessment, including *Irreplaceable habitats present and would be negatively impacted by development*.

Welsh Wood Local Nature Reserve / Local Wildlife Site / ancient woodland

- 2.8 Welsh Wood is the largest remnant of a larger ancient woodland, part of which was partially converted into parkland and then developed to form the residential area of Welshwood Park Road, woodlands road and adjacent areas. The current Welsh Wood is just a small survivor of the once larger ancient woodland (Figure 03 and Appendix 3) and is designated as a Local Wildlife Site (Appendix 4) and Local Nature Reserve (Appendix 5). Welsh Wood is promoted for recreational use which has caused and is causing harm to its ecological value.
- 2.9 An asphalt path across Welsh Wood has destroyed ground flora and soils along its route. There is a myriad of desire line path within the wood, where dog walkers and others walk, compacting soil and destroying ground flora (Figure 04). It is possible that some of these desire lines started as muntjac deer tracks which were then used by the community. A stream in the wood has been harmed by walkers crossing it, damaging the banks. There are even two access points from the wood to arable land on the south-west side not shown on the Local Nature Reserve map as seen on signposts. Despite no rights of way existing, the access points used by the public include the adjacent field edge which has no public right of way marked on OS maps.
- 2.10 Data from Essex Field Club shows that Species of Principal Importance are present in Welsh Wood including Rustic moth, Buff Ermine moth, and Blood-vein moth, and the Essex listed Button Snout moth and White Admiral butterfly. Ancient woodland plants have been recorded, such as bluebell *Hyacinthoides non-scripta* and wood sorrel *Oxalis acetosella*, which are vulnerable to trampling.

² <https://www.gov.uk/government/statistics/the-people-and-nature-surveys-for-england-adults-data-y5q4-january-2025-march-2025/adults-year-5-annual-report-april-2024-march-2025> accessed on 4th December 2025

- 2.11 It is inevitable that residential development in the proposed allocation, with a huge increase in residents, will increase the number of people walking in Welsh Wood and increasing harm. As well as increasing the number, width and the soil compaction of desire lines there would also be an increase in littering, arson, damage to trees and shrubs, removal of dead wood and gardening in the wood. Damage to shrubs and ground flora will remove the plants needed by the moths and other invertebrates to complete their annual life-cycles.
- 2.12 A buffer would need to be sufficiently large that impacts from the public can be excluded; any accessible greenspace will encourage residents towards the veteran trees where the various harms discussed above will be caused. Natural England's People and Nature Survey³ found that 74% of adults visited a green space up to 5 minutes walk away, within the 14 days prior to the survey. Even with a walk distance to the greenspace being 6 – 15 minutes away, 68% of adults visited a greenspace in the 14 days prior to the survey. This indicates that even if the buffer is big enough to need a walk of 15 minutes to reach the veteran trees, a high visitor pressure would arise from the proposed allocation. Even if 'only' half the allocation was within 15 minutes, with a population of 2400 people, a visitor pressure of 68% of people (1632 people) would visit at least once every two weeks. And there would also be visits by people over 15 minutes walk away, albeit with a lower frequency. A buffer of up to 1km from the nearest dwelling could well be insufficient to prevent harm from the allocation.
- 2.13 Colchester City Council *Emerging Allocations Biodiversity Assessment* (November 2024) gave a harm score to Welshwood Park, no reference number (page 8) and Land north of Bromley Road, Colchester, site reference 10616. Had the report author been aware of the problems of Welsh Wood, to be greatly increased by additional development, the harm score would have been upgraded to 'Significant harm' using the criteria on pages 3 and 4 of the Assessment '*Within or adjacent to a non-statutory designated site and development likely to have a significant negative impact on its extent or condition*'.

Additional remnant of Welsh Wood / Welshwood historic parkland

- 2.14 During my site visit in September 2025, I identified a previously unrecognised small remnant of Welshwood Park historic parkland, which in itself was derived from the woodland of Welsh Wood. It comprises a small number of mature oak trees and semi-natural ground flora. It is the presence of natural ground vegetation which sets it apart from other trees in Welshwood Park Road and adjacent residential areas of 'Woodlands' and 'The Glades', where there are mature oak trees set in amenity lawn and heavily managed gardens. The parkland remnant was seen from a public footpath and appears to be privately owned. Its location is shown indicatively on Figure 05.
- 2.15 The "Wood-pasture and Parkland" Habitat of Principal Importance in England includes areas derived from medieval forests and emparkments, wooded commons, parks and pastures with trees in them. This applies here, with the Welshwood Park being derived from ancient woodland. Habitat Criterion 4 (HC4) – Wood-pasture and Parkland of the LOCAL WILDLIFE SITE SELECTION CRITERIA produced by the Essex Local Wildlife Sites Partnership and published by Essex Wildlife Trust (January 2016) includes *Any remnant area of mature parkland and/or wood-pasture...* This small area of land is therefore valued as a Local Wildlife Site and appropriate buffers would need to be applied if a development were

³ <https://www.gov.uk/government/statistics/the-people-and-nature-surveys-for-england-adults-data-y5q4-january-2025-march-2025/adults-year-5-annual-report-april-2024-march-2025> accessed on 4th December 2025

to proceed. Its location on private land means that some of the public pressure harms would not apply, and the buffer zone would be smaller than that required for veteran trees and ancient woodland.

Wall's Wood Local Wildlife Site

- 2.16 Wall's Wood Local Wildlife Site, adjacent to the eastern boundary of the proposed allocation PP9 (Appendix 4), is Lowland Mixed Deciduous Woodland, part of which is Ancient Woodland (See Appendix 3; data from Essex Field Club). It contains public footpaths, including a path from the proposed allocation site⁴. Residential development on the combined site will inevitably result in public incursion into Wall's Wood, as evidenced by public incursion into arable field edges and formation of desire lines in Welsh Wood. Public trespass for dog walking and anti-social activities causing degradation of the Wall's Wood is easily predicted.
- 2.17 A buffer would be similar to that discussed for Welsh Wood above, with a 1km buffer possibly being insufficient.
- 2.18 Colchester City Council *Emerging Allocations Biodiversity Assessment* (November 2024) gave a harm score to Welshwood Park, no reference number (page 8) and Land north of Bromley Road, Colchester, site reference 10616. Had the report author been aware of the problems of Welsh Wood, which would also apply to Wall's Wood albeit that existing harms have not been studied at Wall's Wood, the harm score would have been upgraded to 'Significant harm' using the criteria on pages 3 and 4 of the Assessment *Within or adjacent to a non-statutory designated site and development likely to have a significant negative impact on its extent or condition*.

Protected species

- 2.19 Members of the Welshwood Park Residents' Association have reported reptiles including grass snake, nesting skylark, and bats on the allocation site, and have been encouraged to submit sightings to Essex Wildlife Trust's 'Nature Count' recording system. These data will eventually be supplied to Essex Field Club. A concern has also been raised that there might be great crested newts in a pond within the site, close to Shaw's Farm. Other protected species might also be present. The railway line forms the north-west boundary to the area of concern to the Residents' Association. It is on a raised embankment, forming a south-east facing slope very suitable for reptile species (Figure 06) and potentially some invertebrates which require those conditions. The embankment may act as a source of reptiles and other species entering the allocation land. Whilst many of these species can be surveyed for and mitigated in the development, albeit affecting development viability, skylarks will not nest in public greenspace or anywhere which has public access.
- 2.20 The abundance and distribution of an unknown number of protected species is a material consideration which is poorly addressed in the allocation. Full surveys will be required. The mitigation needs and mitigation costs are unknown. The mitigation adds cost and so reduces viability of the site.

Hedgerows

- 2.21 The site contains a number of hedgerows, which are historic as demonstrated by being present on the 1881 OS map (Figure 05 and Figure 06). The retention of these hedgerows is a material consideration in any development.

⁴ <https://www.essexhighways.org/getting-around/public-rights-of-way/prow-interactive-map>

Ecology Constraints Plan

2.22 Figure 06 shows the location of

- Veteran trees
- Veteran coppice stools
- Railway embankment of value to reptiles and possibly other species
- Ancient woodland
- Local Wildlife Sites
- Hedgerows

3. Review of Local Plan documents

Council's Sustainability Assessment

- 3.1 The Council has assessed the proposed allocation for 'sustainability'. Appendix C of the Sustainability Assessment⁵, where it discusses its methodology, misunderstands nature conservation legislation. In paragraph C.90, on page 80, it says that Local Nature Reserves (of which Welsh Wood is one) is a non-statutory nature conservation site. This is incorrect; 'Local Nature Reserve' is a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949. This error may have resulted in the impacts on Welsh Wood not being categorised correctly. Furthermore, the assessment criteria for biodiversity in Table D8, page 112/113, omits to include veteran trees as ecological features which might be harmed by development.
- 3.2 The detailed assessment is in the 2025 Sustainability Assessment⁶, on pages 355 – 359. It is given a significant negative score for Biodiversity, the lowest possible. However, even after considering mitigation in policy PP9, it is still scored negative for biodiversity, indicating that full mitigation isn't possible. Accompanying text, in paragraph 5.250, confirms that harm to Welsh Wood (LNR/Local Wildlife Site / Ancient Woodland) and Wall's Wood (Local Wildlife site and part Ancient Woodland) is reduced but not prevented. Veteran trees are not mentioned, because their presence was not made available to the sustainability Assessment author. The newly-identified remnant of Welshwood Park historic parkland was also not included in the assessment because the Council's evidence base did not include a site survey.
- 3.3 Other sites were considered for proposed allocations but rejected, due to harm to woodland⁵. For example, site reference 10257 (page 217 of the 2025 Sustainability Assessment) was discounted from the Local Plan because *The Biodiversity Protection and BNG study concluded that development of the site is likely to lead to harm to biodiversity as it includes woodland Priority Habitat and adjacent development could result in its degradation*. Another example is site 10228, on page 228, which was discounted from the Local Plan because *The Biodiversity Protection and BNG study concluded that development of this site is likely to lead to significant harm to biodiversity as the site development would impact Priority habitat woodland*. There should be consistency in Planning, so that decisions are justified and acceptable. It is not consistent to reject sites for a relatively small number of dwellings which would degrade Priority woodland which is not ancient nor designated as Local Wildlife Site, yet to allocate site PP9 North-East Colchester (with 2000 dwellings) where there would be degradation of woodlands designated as Local Wildlife Sites, some of which is a statutory Local Nature Reserve and much of which is ancient.

Assessment of Policy PP9 against Policy EN3: Biodiversity and Geodiversity

- 3.4 Policy EN3 of the Regulation 18 Local Plan includes

Proposals for development that would cause significant direct or indirect adverse harm to nationally designated sites or other designated areas, protected species, Habitats and Species of Principal Importance and local importance, will not be permitted unless:

a) They cannot be located on alternative sites that would cause less harm; and

⁵ Colchester Preferred Options Local Plan Appendices Colchester City Council Final report Prepared by LUC February 2025

⁶ Colchester Preferred Options Local Plan Sustainability Appraisal Report Colchester City Council Final report Prepared by LUC February 2025

- b) The benefits of the development clearly outweigh the impacts on the features of the site and the wider network of natural habitats; and*
- c) Satisfactory mitigation, or as a last resort, compensation measures are provided*

- 3.5 My assessment in Chapter 2 above shows that there would be significant harm caused to veteran trees, successor veteran trees, Welsh Wood (ancient woodland, Local Nature Reserve, Local Wildlife site) and Wall's Wood (Local Wildlife site, part ancient) which cannot be mitigated even with buffer zones up to 1km radius. Even the Council's sustainability assessment says that harm to Welsh Wood and Wall's Wood cannot be mitigated, and that's in the absence of knowledge about veteran trees and the historic parkland remnant.
- 3.6 It is unclear if harms to protected species can be mitigated, for example skylark cannot be provided for within a residential development.
- 3.7 The development as described in policy PP9 cannot be permitted under EN3 paragraphs a) ('no alternative sites') or b) ('benefits outweigh the harm') because paragraph c) also requires satisfactory mitigation. The mitigation of a buffer zone to veteran trees and veteran coppice stools, successor veteran trees, ancient woodland, and other woodland, even up to 1km is not satisfactory, so the allocation fails Policy EN3.

Assessment of Policy PP9 against Policy EN4: Irreplaceable Habitats

- 3.8 Policy EN43 of the Regulation 18 Local Plan is

Policy EN4: Irreplaceable habitats

Proposals that would result in the loss of irreplaceable habitats [as defined in The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024] will not be permitted unless there are wholly exceptional reasons and a suitable compensation strategy, to the satisfaction of the Council, exists.

Proposals predicted to result in adverse impacts upon irreplaceable habitats must be accompanied by detailed survey information and clear evidence to support the exceptional reasons that justify such a loss. The compensation strategy must include contribution to the enhancement and management of the habitat.

Proposals close to ancient woodland must include a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage. Where surveys show that other impacts are likely to extend beyond this distance, a larger buffer zone will be required

- 3.9 Irreplaceable habitats are the ancient woodland of Welsh Wood and Wall's Wood, and veteran trees / veteran coppice stools. As demonstrated in Chapter 2 above, adverse impacts of recreation pressure and other urban impacts cannot be satisfactorily mitigated. Impacts on ancient woodland and veteran trees arise from development well beyond 15 metres, with people frequently visiting greenspace up to 15 minutes walk away (1km or more distant, based on typical recreational walking distances). A buffer zone of up to 1km from the veteran trees and ancient woods may not be enough, even if the allocation were to be revised to include that buffer. Policy PP9 therefore fails Policy EN4.

4. Conclusion

- 4.1 The part of proposed policy PP9 allocation east and south of the London – Norwich Railway line contains veteran trees which are irreplaceable habitat, and is adjacent to Welsh wood (statutory Local Nature Reserve, ancient woodland, Local Wildlife Site of county importance), Wall's Wood (Local Wildlife Site of county-wide importance, part ancient) and a small remnant historic parkland (qualifies as Local Wildlife Site). Veteran trees and woodland would be harmed by increased trampling, arson and vandalism, damage to vegetation interest in its own right and also supporting important invertebrate species, and public pressure for removal of valuable dead wood.
- 4.2 The proposed allocation fails the Council's own sustainability assessment for impacts on woodland, even after mitigation is applied, without considering impacts on veteran trees or remnant historic parkland. It fails Policy EN3, because impacts on veteran trees, veteran coppice stools and woodland cannot be satisfactorily mitigated, and it fails Policy EN4 because the impacts on irreplaceable habitats (ancient woodland, veteran trees and veteran coppice stools) cannot be satisfactorily mitigated.
- 4.3 **I conclude that the allocation of land east and south of the London – Norwich railway line is ecologically unacceptable because it fails emerging policies EN3 and EN4, and should be removed from the emerging Local Plan.** I have not studied the part of the allocation west and north of the London – Norwich railway line and so do not comment on that.

Figure 01 Veteran tree damaged by arson



Figure 02 Veteran coppice stools



Veteran oak coppice with above-ground stool decayed



Veteran hedge coppice (or veteran laid hedge shrub)

Figure 03 Welsh Wood, 1800 – 1860

1800 -1860 OS map, showing the current remaining part of Welsh Wood, and the woodland which later became Welshwood Park.



Figure 04 Welsh Wood public trampling



A crossroads caused by desire line formation

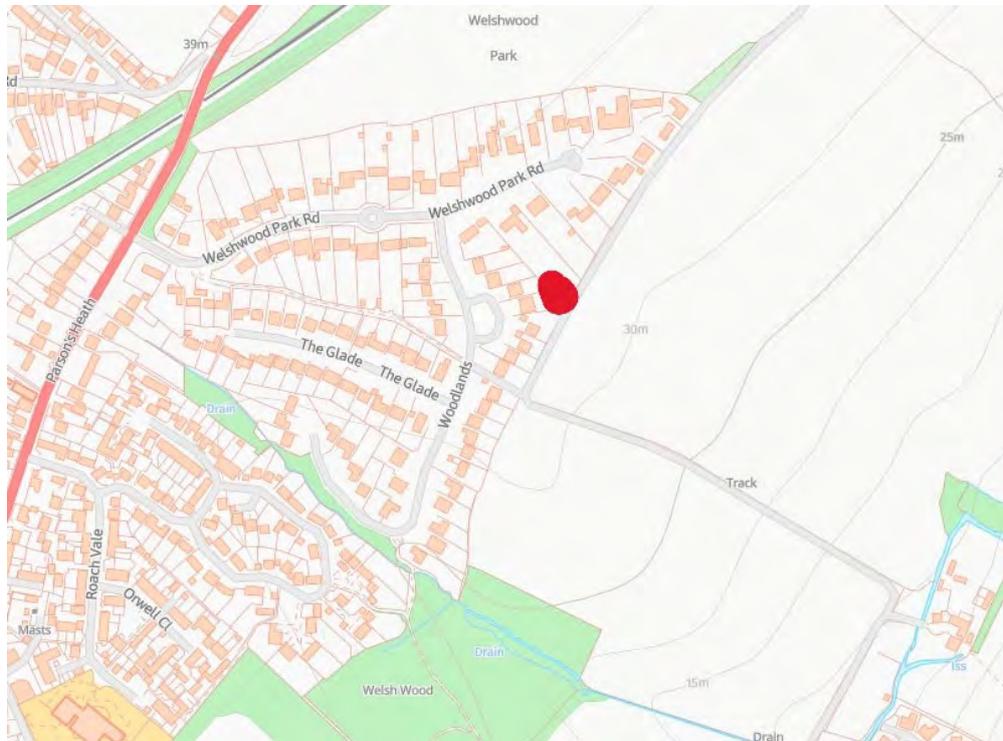


An unauthorised access from an adjacent arable field caused by the public

Figure 05 Welsh Wood / Welshwood Park historic parkland remnant

The red marking indicates its indicative location.

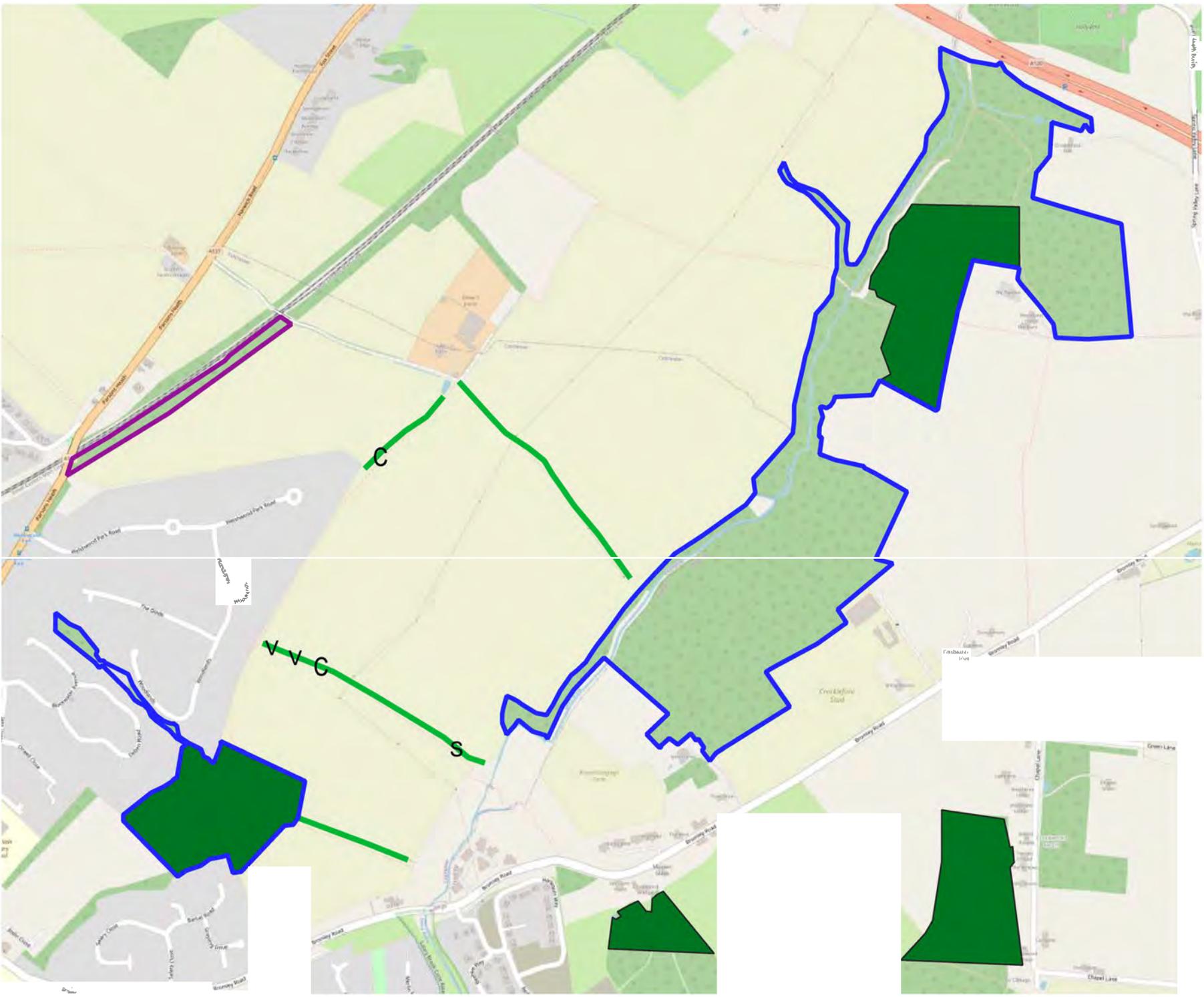
A) on modern map



b) shown on the 1880 OS map



Figure 06 Ecological Constraints



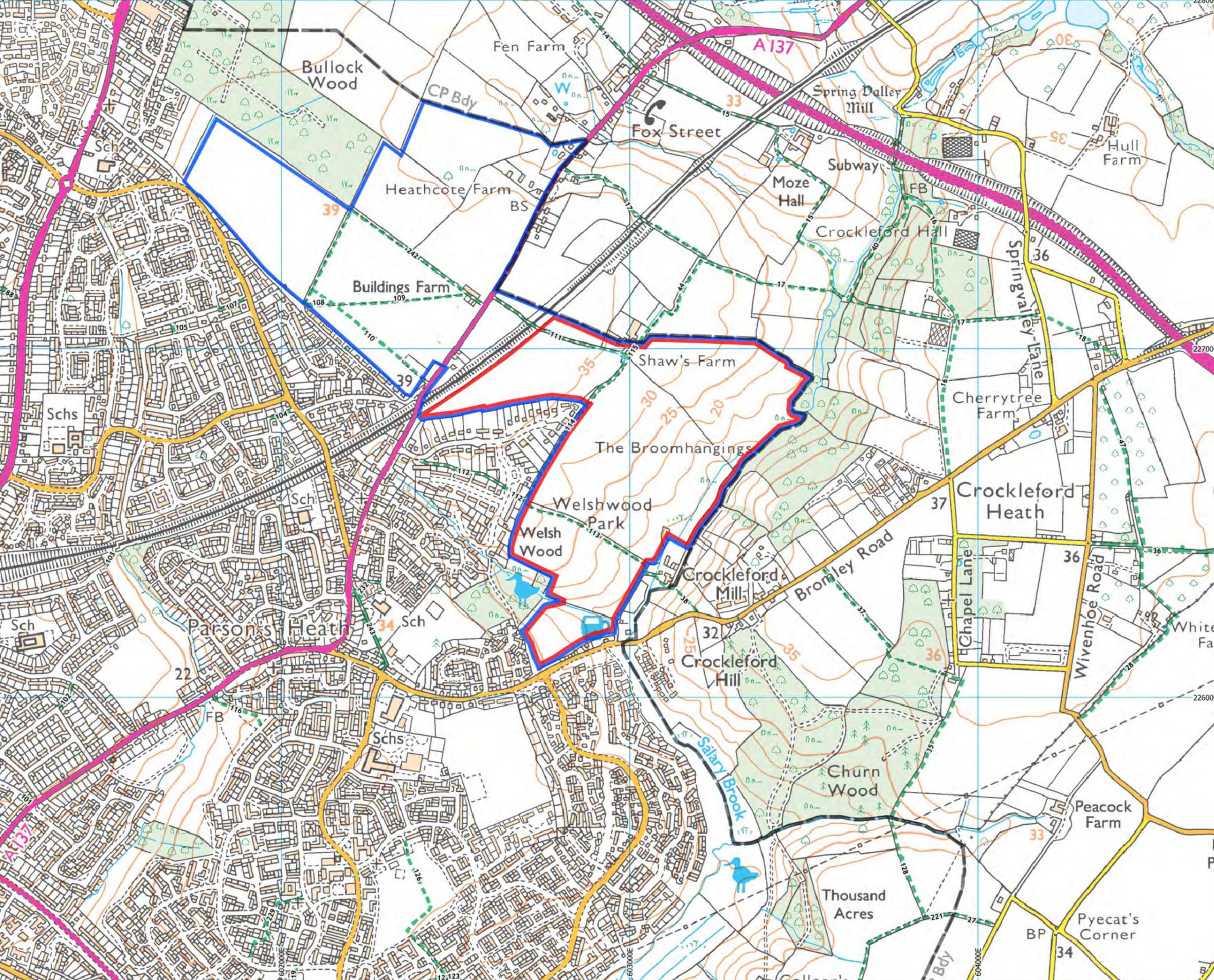
- Key**
- Local Wildlife Site
 - Ancient woodland
 - Reptile habitat on bank
 - C** Veteran coppice stool
 - S** Successor Veteran tree
 - V** Veteran tree
 - Historic Hedgerows

072 - Welshwood Park
 Figure 06
 Ecological Constraints Plan
 December 2025

Appendix 1 Location and area of concern

KEY:

-  LPA boundaries
-  Policy PP9: proposed allocation
-  Area of concern to Welshwood Park Residents' Association



LOCATION MAP

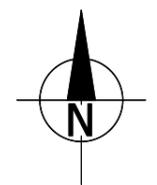
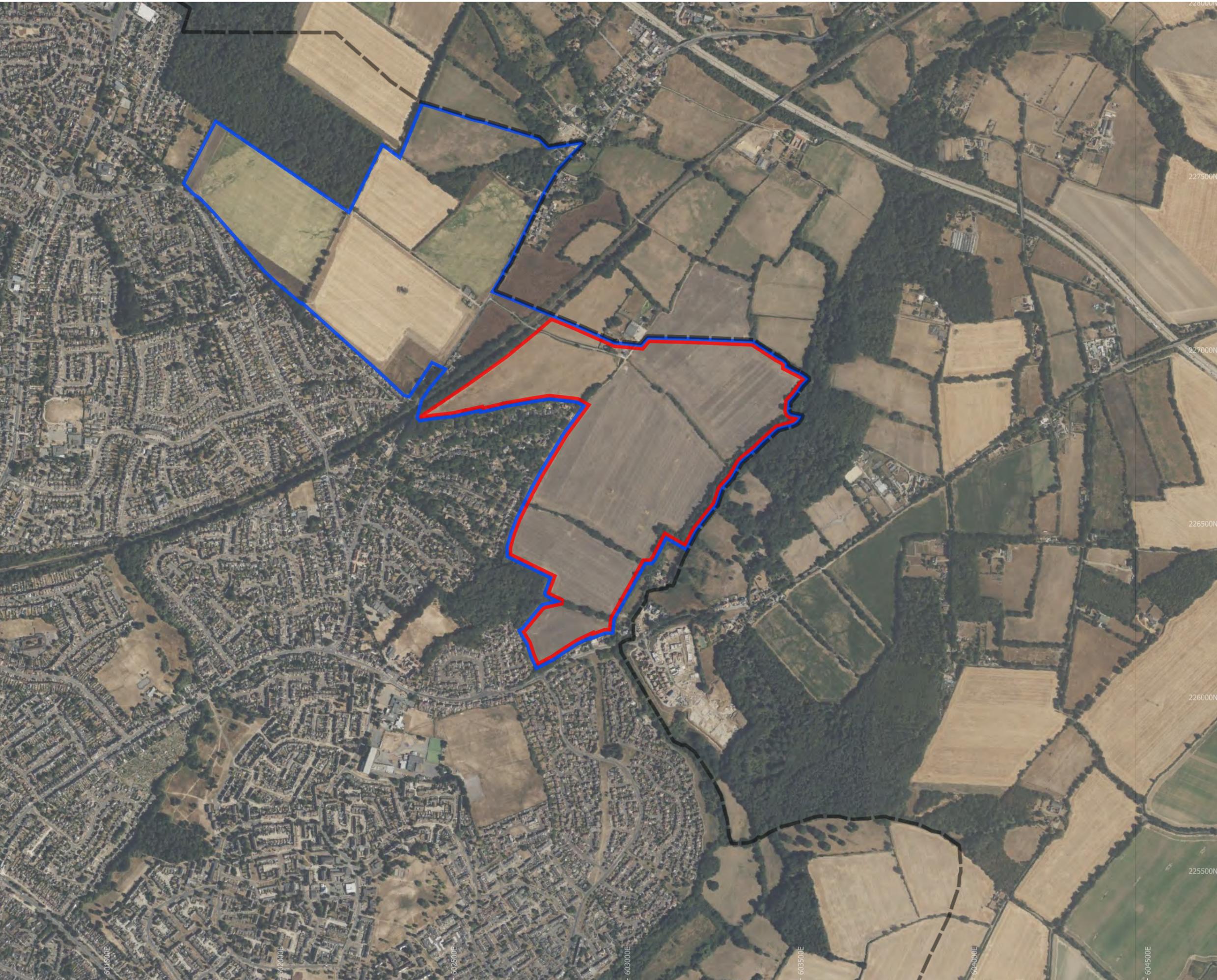
Welshwood Park
Colchester

NC25.938-lva01_Part 2_figures

FIGURE 1.

KEY:

-  LPA boundaries
-  Policy PP9: proposed allocation
-  Area of concern to Welshwood Park Residents' Association



AERIAL PHOTO

Welshwood Park
Colchester

NC25.938-lva01_Part 2_figures

FIGURE 2.

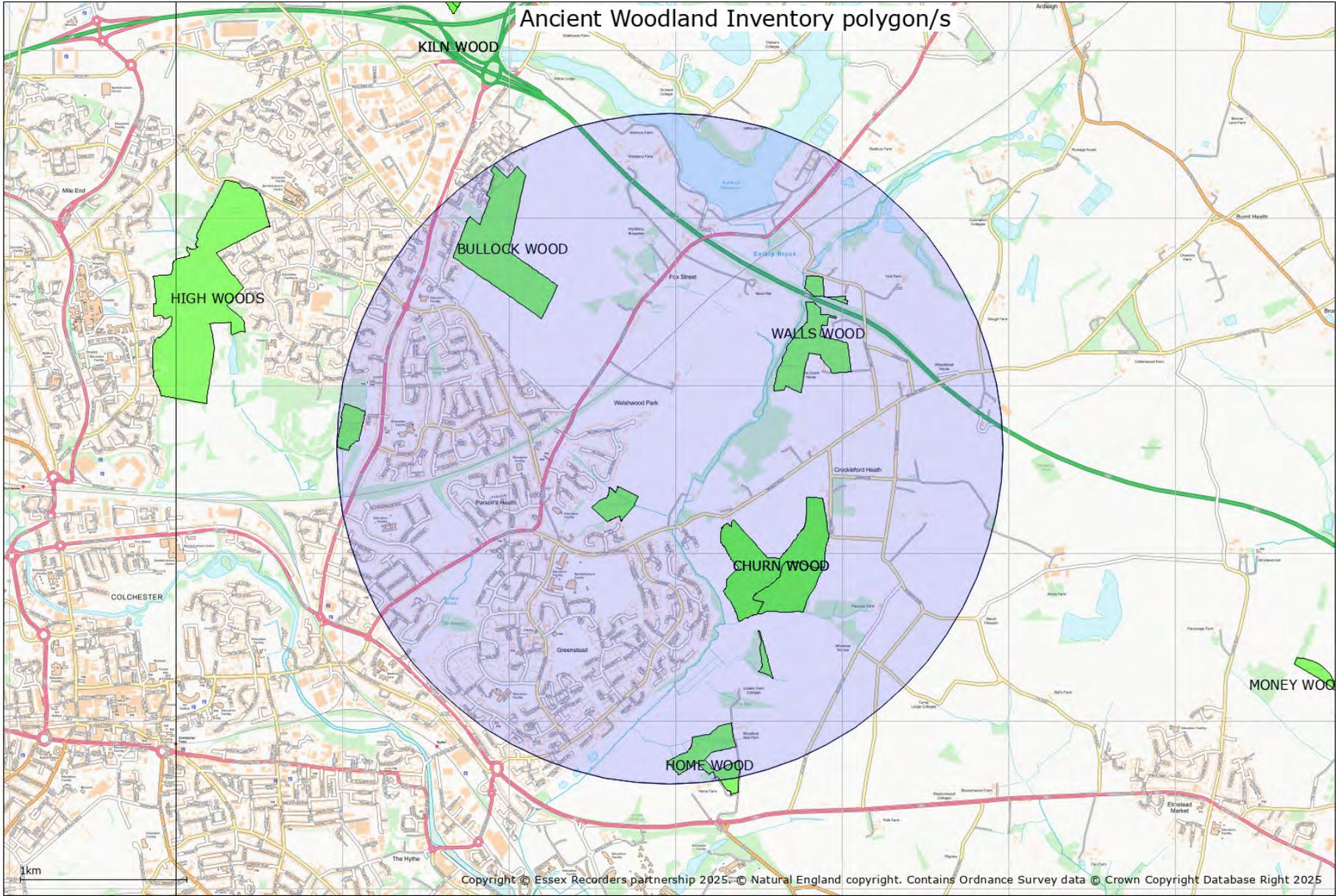
Appendix 2 Protection given to Designated sites in England

The designated sites in the table are arranged roughly in order, from local to international importance. Some sites have multiple designations. Other uncommon designations are not listed but might rarely occur. Designations vary in Scotland, Wales and Northern Ireland.

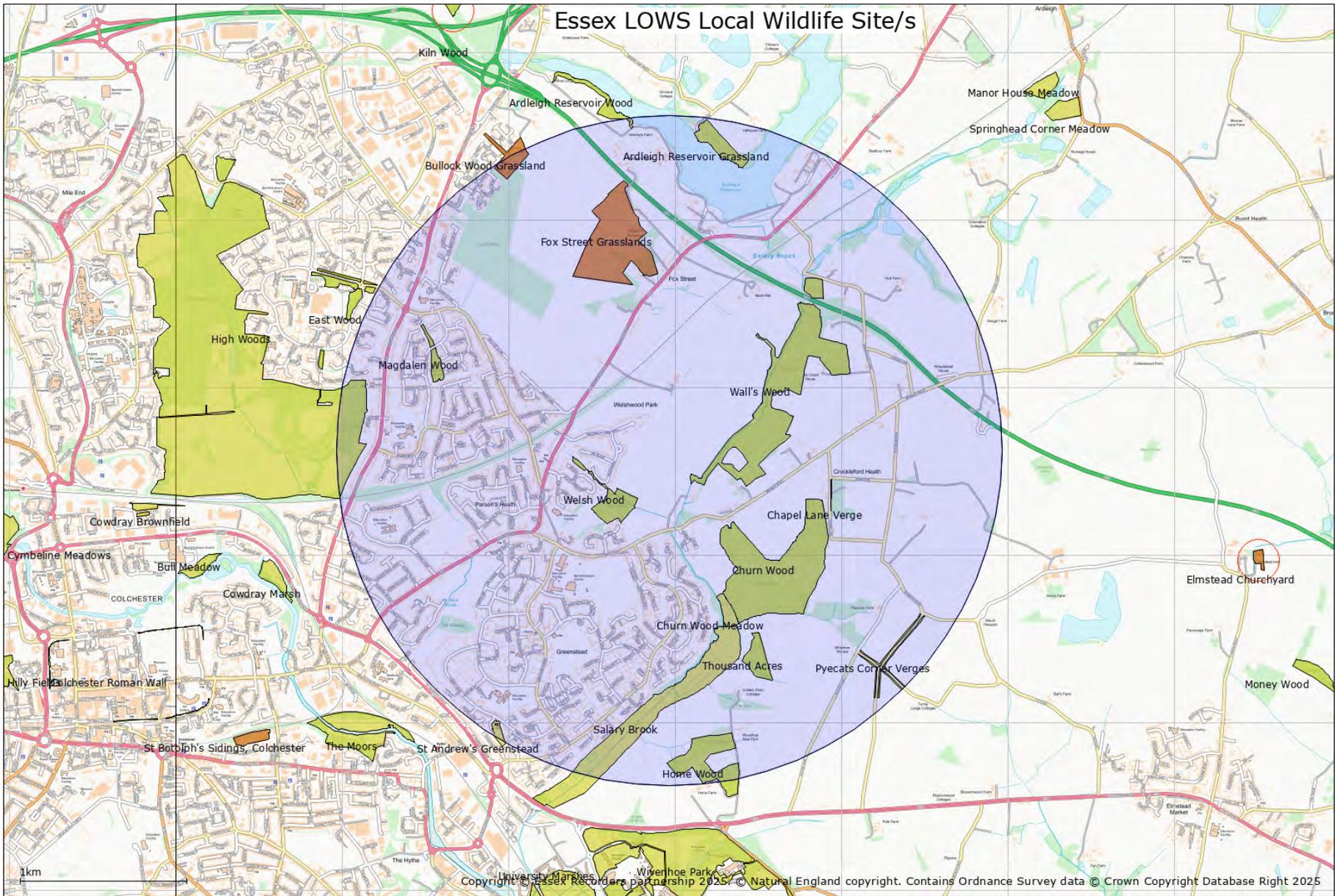
Designation – non-statutory	Designated by	Notes
Priority Habitat, sometimes known as Habitat of Principal Importance	Not a designation on land, but it describes the importance of the habitat	Development which would harm a Priority is unlikely to be permitted. There is often the possibility of mitigation / compensation depending on the habitat type. Some habitats are 'irreplaceable habitats' so compensation is not possible for any loss.
Local Wildlife Site, in some areas known as County Wildlife Site, site of Interest for Nature Conservation, Site of Nature conservation Interest.	Council and/or Wildlife Trust for the area, often in partnership	Development which would harm a LWS is unlikely to be permitted. There might be some flexibility on mitigation / compensation depending on the reasons for designation.
Ancient Woodland	Not a formal designation, but woodlands are recognised as being Ancient by Natural England	Planning policy protects ancient woodlands from harm, and normally a buffer of 15m or more is required to be left around an ancient woodland. They are 'irreplaceable habitats' so compensation is not possible for any loss.
Designation – statutory	Designated by	Notes
Local Nature Reserve (LNR)	Council (Unitary, County, District/Borough or Parish)	Land of local importance managed for nature conservation, education, research or recreation. Unlikely to be part of a development site, except for development to facilitate management of the LNR
Site of Special Scientific Interest (SSSI)	Natural England	Nationally important sites, designated for habitats, species, geology, and often for more than one of these. Development which would harm a SSSI, by land-take or by off-site impacts, will not be permitted.
National Nature Reserve (NNR)	Natural England	Land already designated as SSSI, and managed by Natural England or other body as a nature reserve. Unlikely to be part of a development site, except for development to facilitate management of the NNR

<p>European designated sites – Special Protection Area (SPA, designated for birds) and Special Area of Conservation (SAC designated for habitats, or species other than birds).</p>	<p>UK Government</p>	<p>All European designated sites are also SSSIs. Development which would harm a SAC or SPA may not be permitted by law, except in very special circumstances. Development several kilometres from a SAC or SPA can cause harm, e.g. recreational disturbance, neutrality. An assessment of impacts is called a Habitat Regulations Assessment.</p>
<p>Ramsar sites</p>	<p>UK Government</p>	<p>Ramsar sites are wetlands of global importance, and all are SSSIs. Most are SPA and/or SAC too. Planning policy treats all Ramsar sites as if they were European designated sites.</p>

Appendix 3 Ancient Woodland

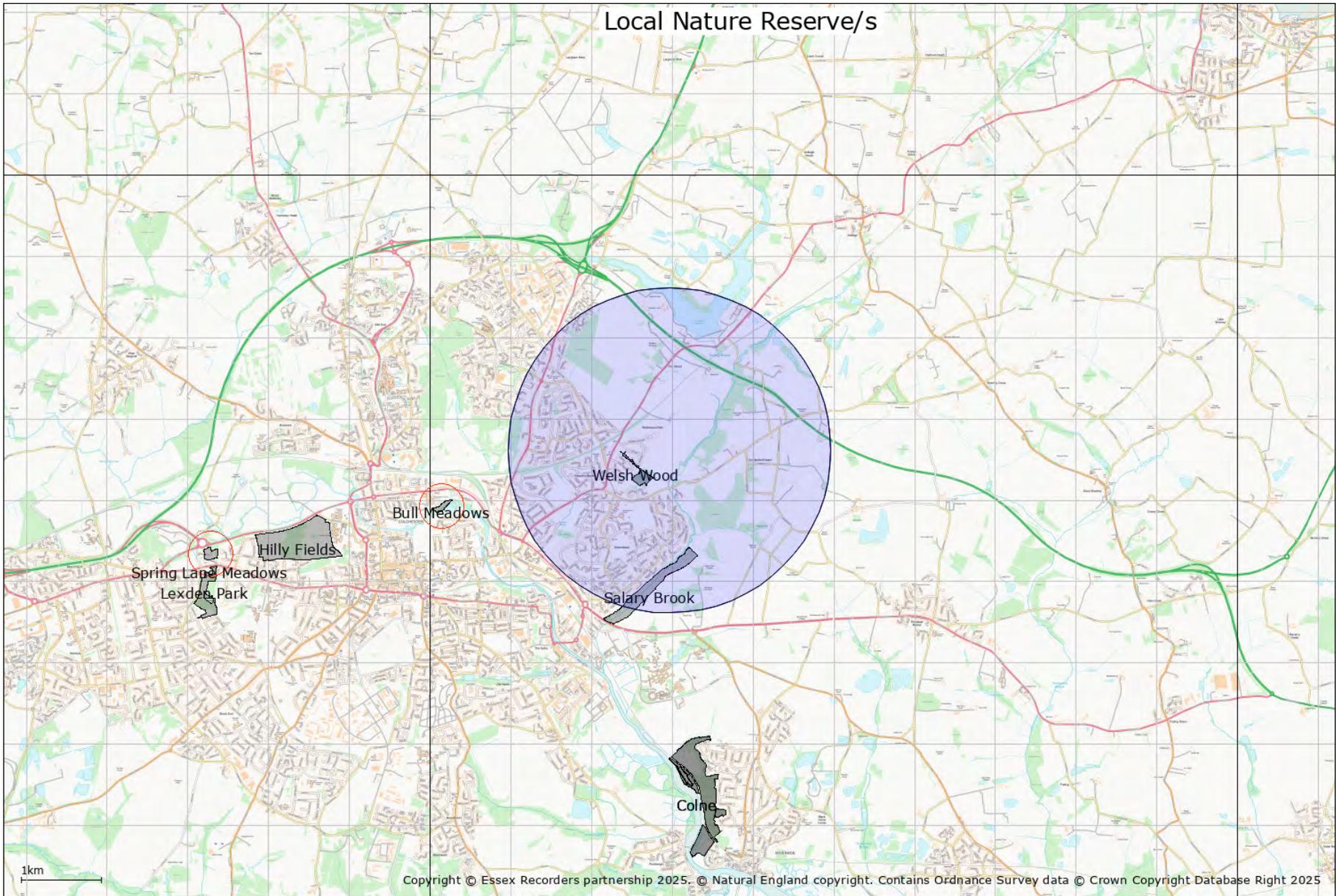


Appendix 4 Local Wildlife Sites



Appendix 5 Local Nature Reserve

Local Nature Reserve/s



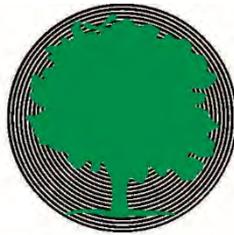


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Appendix 6





Sylva Consultancy
expert arboricultural advice

ARBORICULTURAL REPORT

Land to the east of Welshwood Park Road
Colchester
Essex
CO4 3JA

December 2025

Ref: 25231

Prepared by Fiona Bradshaw MICFor; Dip.Arb (RFS); F. Arbor.A; Tech Arbor.A

Issued: 9th December 2025



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CONTENTS

1.	Instructions	3
2.	Tree Protection	3
3.	Pre Site Visit Assessment Findings	4
4.	Site Visit Assessment Findings	5
5.	Post Site Visit Assessment Findings	5
6.	Conclusions	6
7.	Recommendations	7

APPENDICES

1.	Overview of Survey Areas	8
2.	Location of Wesh Wood	9
3.	Location of Trees	10
4.	Photographs	11
5.	Bibliography / Tree Glossary	12
6.	Qualifications	13

This report is for the sole use of the above-named client and refers to only those trees identified within; use by any other person(s) in attempting to apply its contents for any other purpose renders the report invalid for that purpose.

1. INSTRUCTIONS

- 1.1 Instructions have been received from Welshwood Park Road Resident Association to carry out an Ancient/Veteran Tree Assessment on land to the east of Welshwood Park Road, Colchester.
- 1.2 Only publicly assessable areas have been reviewed. The survey areas are identified as Colchester Footpath113 & Colchester Footpath114 (Overview of Survey Areas Appendix 1).
- 1.3 This report has been requested to assess the following:
 - Whether Ancient/Veteran Trees are present in the areas identified.
- 1.4 This report only considers individual trees. Please refer to Sibbett Ecology's Ecological appraisal dated December 2025 for information on the presence of ancient coppice stools.
- 1.5 The site visit was carried out by on 28th October 2025.
- 1.6 The Ancient/Veteran Tree Assessment data has been collected using the Woodlands Trust's Ancient and Veteran trees assessment form.

<https://www.woodlandtrust.org.uk/publications/2022/06/green-recovery-avt-tree-assessment-guide/>

2. TREE PROTECTION

- 2.1 A desktop study of information posted on the Colchester City Council's (CCC) interactive mapping system was carried out on the 13th November 2025 (https://colchester.statmap.co.uk/map/map.html?login=Public_User_external).
- 2.2 CCC's interactive mapping system indicates that the survey areas are not located within a Conservation Area. The interactive mapping system also indicates that no Tree Preservation Orders (TPO's) are present on trees within the survey areas.
- 2.3 Information provided by Natural England (<https://magic.defra.gov.uk>) confirms that Ancient & Semi-Natural Woodland known as Welsh Wood is located within proximity to the survey areas. Welsh Wood lies approximately 200m to the southwest of Colchester Footpath 113 and 500m to the southwest of Colchester Footpath 114 (Appendix 2).

3. PRE SITE VISIT ASSESSMENT FINDINGS

3.1 As part of the pre site visit assessment the Ancient Tree Inventory was consulted (<https://ati.woodlandtrust.org.uk/tree-search>). The pre site assessment confirmed that two veteran trees have been recorded growing adjacent to Colchester Footpath 113. These trees have been identified as trees T1 & T2 within this report:

Tree T1: Oak

Waypoint Oak

Colchester, Essex
Recorded by: Graeme Cassidy, As an individual

[Manage](#)



[View photos](#)

About the tree		Show more
Species:	Pedunculate oak Quercus robur	
Form:	Pollard lapsed	
Standing or fallen:	Standing	
Living status:	Alive	
Girth:	3.54m at a height of 1.50m	
Veteran status:	Veteran tree	

Tree T2: Oak

The Burnt Oak

Colchester, Essex
Recorded by: Graeme Cassidy, As an individual

[Manage](#)



[View photos](#)

About the tree		Show more
Species:	Pedunculate oak Quercus robur	
Form:	Pollard lapsed	
Standing or fallen:	Standing	
Living status:	Alive	
Girth:	3.81m at a height of 1.00m	
Veteran status:	Veteran tree	

4. SITE VISIT ASSESSMENT FINDINGS

- 4.1 The onsite assessment consisted of an initial walk by review of trees growing adjacent to Colchester Footpath 113 & Colchester Footpath 114.
- 4.2 The walk by assessment of Colchester Footpath 113 identified three trees as requiring further assessment. These trees were assessed following the 'Ancient and Veteran Trees: An Assessment Guide' published by the Woodland Trust.
- 4.3 No trees were identified on Colchester Footpath 114 as requiring further assessment.
- 4.4 At the time of the onsite inspection trees T1 & T2 were listed on the Woodlands Trust Ancient Tree Inventory website. Consequently, no additional information was collected.
- 4.5 No Ecologist was onsite during the assessment. As such no comments have been logged with respect to evidence of whether invertebrate or bats are present (please refer to Sibbett Ecology's Ecological appraisal dated December 2025 for further information).

5. POST SITE VISIT ASSESSMENT FINDINGS

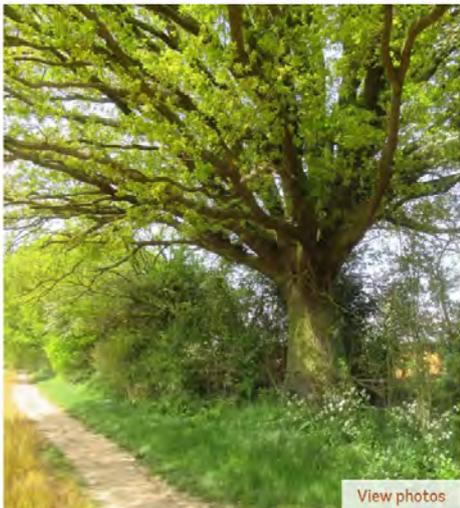
- 5.1 A post site assessment of information listed on the Ancient Tree Inventory list was carried out. This revealed that tree T5 had been catalogued on this inventory during the time lapse between instructions and the onsite surveying work.

Tree T5: Oak

Canopy Oak

Colchester, Essex
Recorded by: Graeme Cassidy, As an individual

[Manage](#)



[View photos](#)

About the tree [Show more](#)

Species:	Pedunculate oak Quercus robur
Form:	Pollard lapsed
Standing or fallen:	Standing
Living status:	Alive
Girth:	3.90m at a height of 1.50m
Veteran status:	Veteran tree

6. CONCLUSIONS

6.1 Summary

- 6.1.1 instructions were received to carry out an Ancient and Veteran Tree Assessment on trees growing adjacent to Colchester Footpath 113 & Colchester Footpath 114.
- 6.1.2 The survey areas, as identified by Natural England are located within proximity to Welsh Wood, a recorded Ancient & Semi-Natural Woodland. Ancient & Semi-Natural woodlands are valued for their trees, especially veteran and ancient trees, and the plants and animals that they support. Specialised and varied habitats within Ancient & Semi-Natural Woodlands provide a home for a wide range of species, many of which occur only in these habitats, particularly insects, lichens and fungi which depend on dead and decaying wood. Individual trees, some of which may be of great size and age, are key elements of the habitat and many sites are also important historic landscapes.
- 6.1.3 Prior to the site visit trees T1 & T2, Oak x 2 were listed on the Woodlands Trust Ancient Tree Inventory website. Instructions for this assessment did not include the evaluation of their inclusion on the inventory.
- 6.1.4 Trees T3, T4 & T5 have been identified as mature oaks which are growing in an established hedge line adjacent to Colchester Footpath 113. Numerous self-seeded oak trees, along with species associated with hedgerows are present within this survey area.
- 6.1.5 Based on the information collected from the assessment it has been concluded that trees T3, T4 & T5 are 'successor trees'. Whilst the assessment has not classified these trees as ancient or veteran, successor trees are important trees to be retained as these trees will become the next generation of Veteran and/or Ancient trees.

6.2 Conclusions

- 6.2.1 Trees T2, T3 & T5 have features that are typical of their current maturing life span. Whilst the report has not identified these trees as Veteran or Ancient trees the assessment has concluded that these trees are 'Succession Trees'. Succession trees are defined as typically trees of the same species and will be growing near existing ancient or veteran trees and/or ancient and semi natural woodland. The retention of these trees is important to ensure the continued inclusion of Ancient and Veteran trees in the landscape.
- 6.2.2 Given the trees public visibility in the landscape and condition it is recommended that the arboricultural officer at Colchester City Council is contacted. It is deemed that the trees are important features in the landscape and as such should be protected with a Tree Preservation Order (TPO). At this time, it can be further assessed as whether the other trees present merit collective protection with a group TPO designation.
- 6.2.3 Ancient trees and Ancient & Semi-Natural Woodland are irreplaceable habitats. Successor trees are recognised as a important features to retain in the landscape to safeguard the next generation of Veteran and Ancient trees.

7. RECOMMENDATIONS

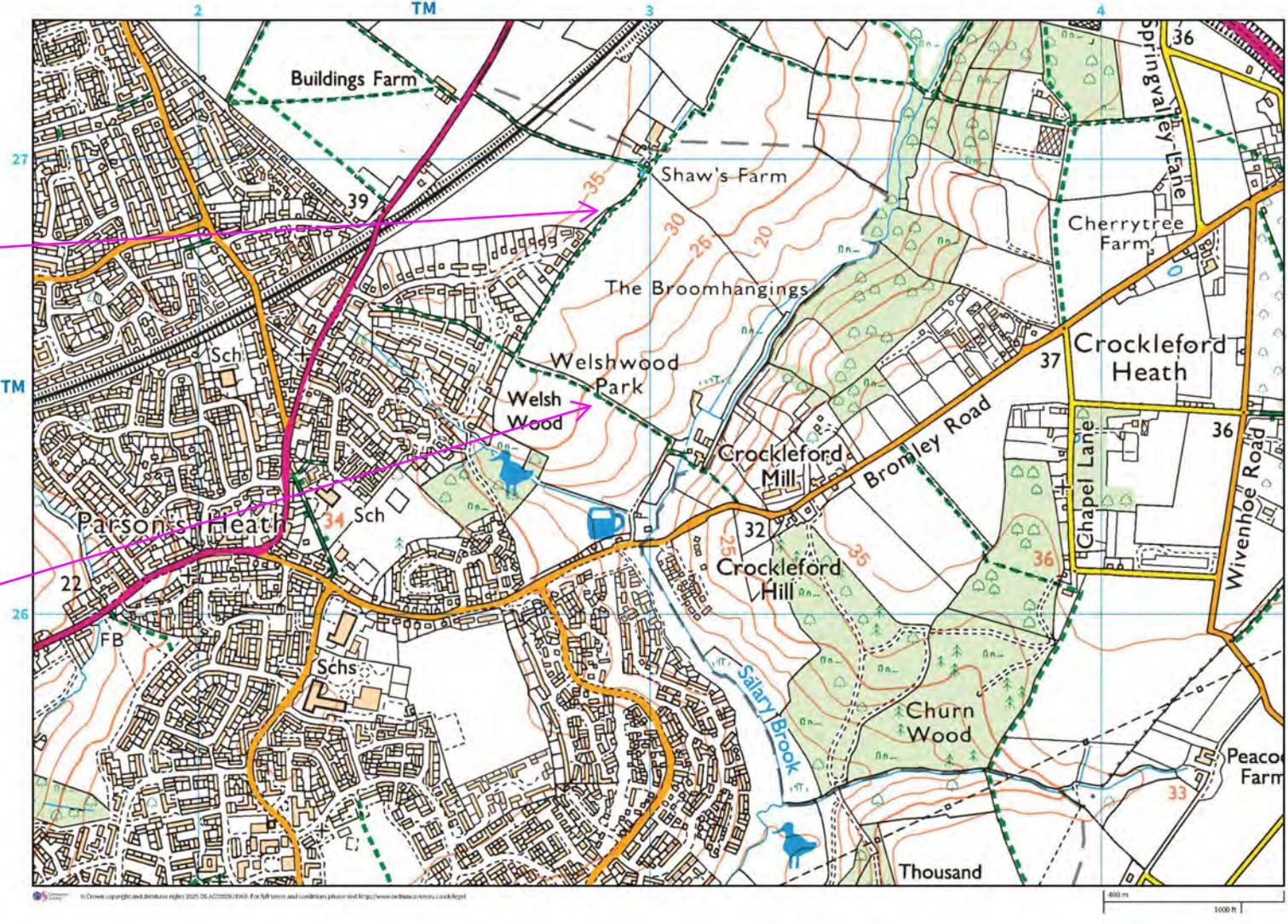
- 7.1 a) Seek advice from an Ecologist on carrying out bat and invertebrate surveys for trees T1 – T5.
- b) carry out a hedgerow assessment along Colchester Footpath 113 & Colchester Footpath 114.
- c) Contact Colchester City Council's arboricultural officer to discuss the long-term protection of trees T3, T4 & T5 due to the threat of development in the local area.
- d) Carry out a landscape appraisal in order to identify and assess the effects of development to the local area and how this may affect trees along Colchester Footpath 113.

OVERVIEW OF SURVEY AREAS

OVERVIEW OF SURVEY AREA

Colchester Footpath 114

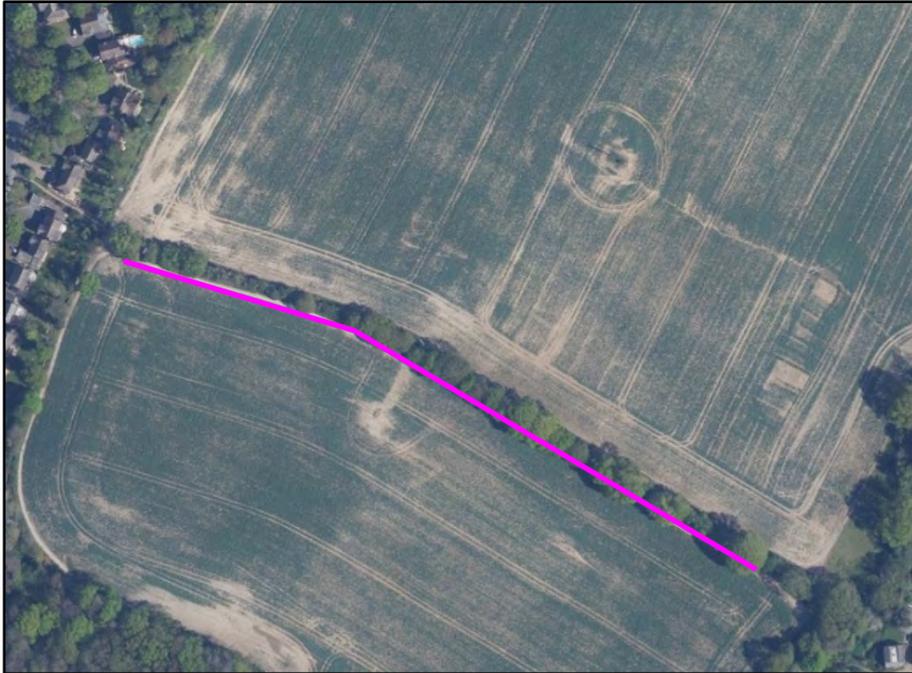
Colchester Footpath 113



1 of 1

OVERVIEW OF SURVEY AREA

Colchester Footpath 113

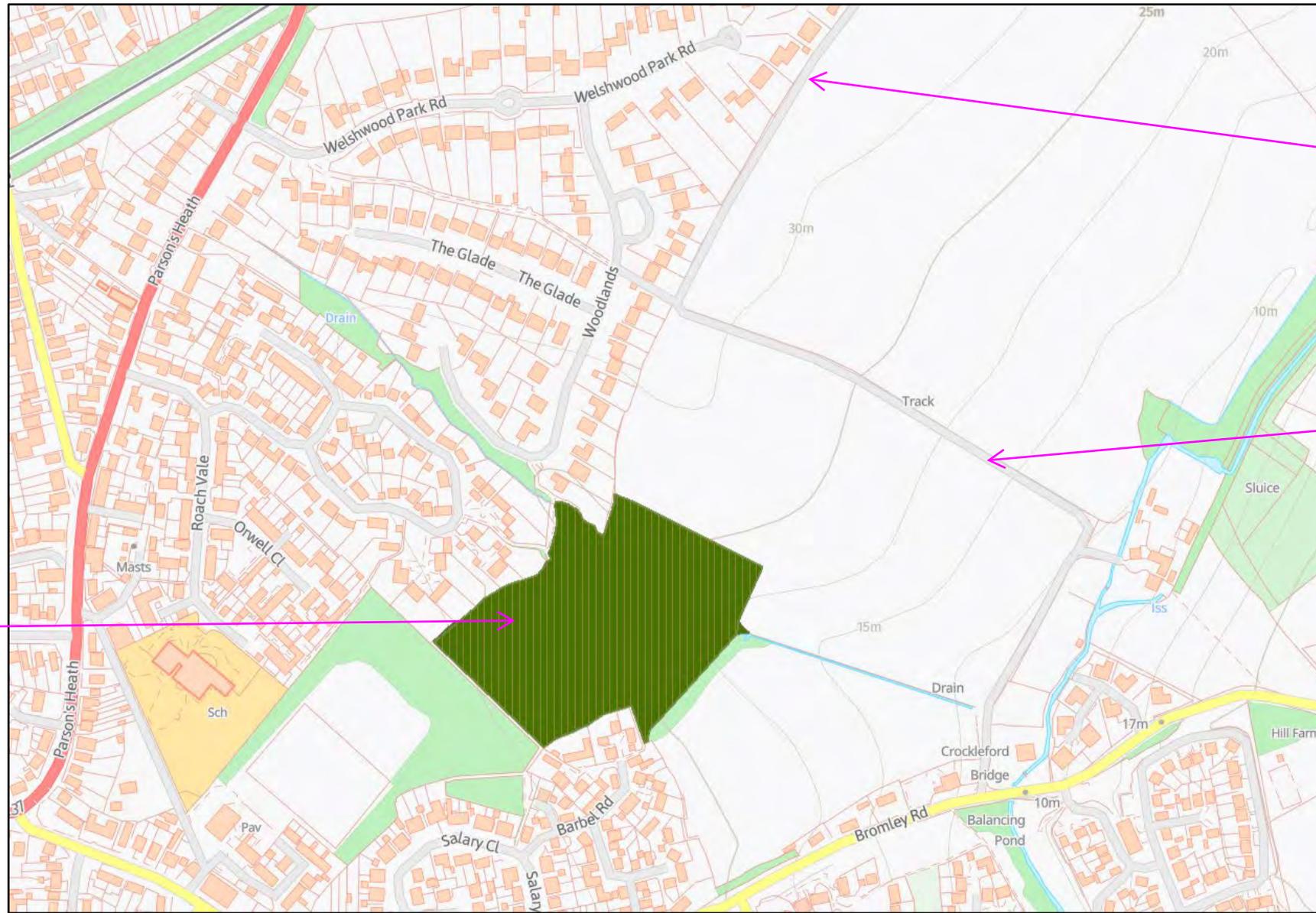


Colchester Footpath 114



LOCATION OF WELSH WOOD

LOCATION OF WELSH WOOD



Colchester Footpath 114

Colchester Footpath 113

Welsh Wood

TREE LOCATION PLAN

LOCATION OF TREES



APPENDIX 4

PHOTOGRAPHS

PHOTOGRAPHS

Tree T3



PHOTOGRAPHS

Tree T4



PHOTOGRAPHS

Tree T5



BIBLIOGRAPHY/ GLOSSARY

TREE GLOSSARY

Adventitious:	Describing shoots, roots or other plant organs which develop other than in their normal position of origin (i.e. terminal/axillary buds).
Arboriculture	The cultivation of trees in order to produce individual specimens of the greatest ornament, for shelter, or any other primary purpose other than the production of timber.
Canopy	The uppermost layer of twigs or foliage in a woodland, tree or group of trees.
Chlorotic:	Chlorosis is an atypical colouring, usually yellowish, of foliage; often symptom of mineral nutrient imbalance or inadequate root function.
Crown	The spreading branches and the foliage of the tree supported by trunk(s).
Crown Cleaning:	The removal of dead, dying, crossing, diseased branches.
Crown Lifting:	The removal of lower limbs, generally back to the main stem or pruning lower secondary branches to give more clear space below the crown.
Crown Reduction:	The tree crown is reduced by shortening branches, usually carried out all round the crown or canopy to maintain a balanced shape. Partial reductions may be useful for preventing branches contacting buildings, roofs and guttering
Crown Thinning:	This reduces the density of the tree's crown without changing the shape and form of the tree. Thinning reduces the amount of foliage and allows more light through the canopy or crown. The amount is usually specified as a percentage (%) of the crown.
Dead wood	In some situations dead wood can pose a hazard as it can fall from the tree. However it also provides a range of habitats both when aerial and when on the ground.
Dieback	The death of a part of a tree, usually starting from the branch tips and progressing in stages.
Epicormics:	Pertaining to shoots or roots which are initiated on mature woody stems; shoots may form in this way from dormant buds or they may be adventitious.
Included Bark:	Bark of adjacent parts of the tree (usually in forks, acutely angled forks or basal flutes) which is a face-to-face contact, so that there is a weakness due to the lack of a woody union.
Occlusion:	The overgrowth of a wound with (callus) tissue which is produced subsequently.
Pollard	A tree cut once or repeatedly at a height above which grazing animals can reach the regenerating growth. Usually cut on a semi-regular basis with the whole or part of the crown removed.
Reaction Wood:	Usually laid down in wider annual increments than ordinary wood. Formed to help maintain the angle of a bent or leaning part of a tree by resisting the further bending downwards.

TREE GLOSSARY

Soil compaction	Soil compaction restricts the growth of trees, damages roots and reduce infiltration of water into the soil which over prolonged periods of time will be detrimental to tree health.
Stress	In plant physiology, a condition under which one or more physiological functions are not operating within their optimum range.
Vitality	In tree assessment, an overall appraisal of physiological and biochemical processes, in which high vitality equates with healthy function.
Wound wood:	Wood formed in the vicinity of a wound. Can also be used to describe the occluding tissues around a wound.

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- ❖ Tree Guide *Owen Johnson & David More* 2004

QUALIFICATIONS

Fiona Bradshaw

MicFor; RFS Dip Arb;F. Arbor.A; Tech Cert (Arbor.A)

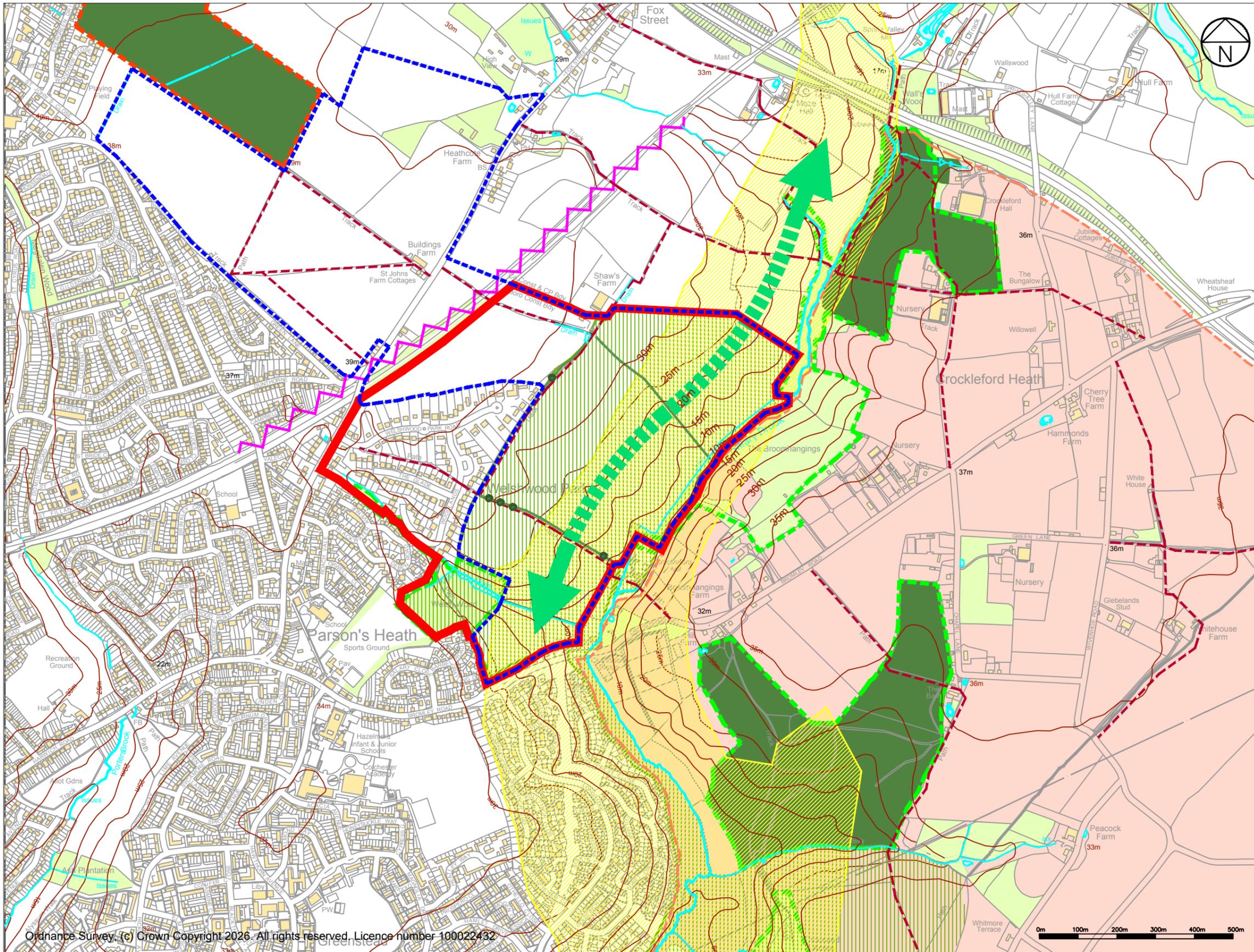
I have over 26 years' experience of arboriculture and I am the principal consultant at Sylva Consultancy. I hold the Royal Forestry Society's Professional Diploma in Arboriculture and the Arboricultural Associations Technicians Certificate. I am a Fellow member of the Arboricultural Association and a professional member of the Institute of Chartered Foresters, of which I am also a registered Consultant.

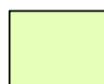
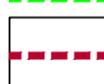
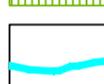
I have the benefit of both a local authority and private practice background and I am frequently instructed to provide advice and assistance relating to trees and the planning process. I am also experienced at compiling expert reports, providing evidence and also appearing as an expert witness at Public Inquires.

I am committed to my continued professional development which is reflected in my regular attendance of seminars and workshops.

Appendix 7





-  Subject Site - Area of primary concern
-  Ancient Woodland
-  Other areas of woodland
-  Contours
-  Proposed Policy Area
-  Proposed Garden Community
-  Local Wildlife Site
-  PROWs
-  Historic hedgerow
-  Veteran trees
-  SSSI
-  Special Landscape Areas (Superseded Policy)
-  Proposed extent of Area of Landscape of Conservation Importance (ALCI) (2005)
-  Waterbodies
-  Necessary green buffer to avoid coalescence
-  Railway line - physical boundary

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Title Constraints Plan Land to the east of Welshwood Park		
Drawing Number 25026_02	Revision a	Revision Detail
Drawn by CH	Date 01/26	Scale 1:10000@A3

Andrew Martin

PLANNING

PLANNING | DESIGN | DEVELOPMENT

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