



STANFORDS

ESTABLISHED 1879

**Colchester City Council Preferred Options Local Plan
Regulation 18 Consultation 2025**

Draft Planning Policy Comments For and on Behalf of Stanfords Colchester LLP

Section: 8

Policy H2: Affordable Housing

Policy Position

Policy H2 requires 30% affordable housing on developments of 10 or more dwellings in urban areas and 5 or more dwellings in designated rural areas. While the intention to address housing need is supported, the approach for rural areas raises significant concerns regarding viability, proportionality, and clarity.

Issues Identified

1. Threshold of 5 Dwellings in Designated Rural Areas – Viability Concerns

The requirement for affordable housing contributions on developments of 5 dwellings or more in designated rural areas is likely to undermine viability for small-scale schemes. Rural sites often involve higher land values, lower densities, and landscape-led layout designs, which increase per-unit costs and reduce flexibility for developers. Imposing this threshold risks making schemes financially unfeasible, discouraging applications and ultimately reducing housing delivery in rural areas.

2. Impact on Rural Community Growth

The policy does not adequately support the relative growth of rural communities. Smaller settlements rely on incremental development to sustain local services and maintain vitality. A rigid threshold approach prioritises affordable housing over enabling proportionate growth. This risks creating a policy environment where rural housing delivery stagnates, contrary to the NPPF's objective of supporting thriving rural communities.

3. Lack of Definition for “Designated Rural Area”

The policy refers to “designated rural areas” without providing a clear definition or cross-reference to a map or statutory designation. This ambiguity creates uncertainty for applicants and decision-makers, potentially leading to inconsistent interpretation. Clear identification of these areas within the Local Plan or supporting documents is essential for transparency and effective implementation.

Recommendations for Improvement

- **Review the Rural Threshold**

Consider increasing the threshold for affordable housing contributions in rural areas or adopting a more flexible approach based on site-specific viability and local need. This would encourage small-scale developments that support rural vitality.

- **Introduce Proportionality Criteria**

Amend the policy to allow proportionate growth in rural settlements, ensuring that affordable housing requirements do not act as a barrier to delivering housing at a scale appropriate to the community.

- **Define “Designated Rural Area”**

Provide a clear definition and mapping of designated rural areas within the Local Plan or supporting documents to ensure transparency and consistency in decision-making.

- **Viability Safeguards**

Include explicit reference to viability testing for rural schemes, recognizing the unique cost implications of landscape-led layouts and lower densities.