



**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: EN5**

**Policy EN5: New and Existing Trees**

We support the principle of protecting existing trees and securing appropriate new planting. However, EN5 cannot be considered in isolation from the separate policy requiring an increase in tree canopy cover (GN4). As drafted, the two policies appear to impose overlapping and potentially cumulative requirements; EN5 seeks an increase in the number of trees and robust protection/mitigation for existing trees while GN4 requires a quantified increase in tree canopy cover.

Requiring both a numeric increase in trees and a separate percentage increase in canopy cover risks double-counting the same objective and could become unduly onerous, particularly on modest allocated sites such as the western parcel of PP44 where other constraints (coalescence, heritage, density) must also be balanced. If the Council is minded to retain a specific canopy requirement, then EN5 and GN4 should be integrated or rationalised, so that applicants are not faced with two separate tree/cover tests which may in practice conflict with each other.

We welcome the recognition in EN5 that the visual and environmental impacts of trees will be assessed “upon maturity” rather than at the point of planting. This is a realistic acknowledgement of how trees function in townscape and landscape terms, and avoids putting undue weight on the immediate, short-term appearance of new planting.

We also support the explicit recognition that the removal of trees can be acceptable where appropriate replacement planting is secured. This reflects the practical reality that some removals are necessary to facilitate development or address safety/condition issues, and that the planning system should focus on the overall, long-term tree resource.

To make EN5 justified and effective, we therefore request that:

1. The policy and supporting text are read and applied together with GN4, and ideally combined, so that applicants are subject to a single, coherent set of requirements on trees and canopy, rather than overlapping obligations; and
2. It is made clear that compliance will be judged on the overall arboricultural and canopy outcome, taking into account necessary removals, new planting and the canopy at maturity, rather than on separate numerical tests for both tree numbers and canopy percentage.