

Colchester City Council Preferred Options Local Plan Regulation Consultation

General Response and Comment by Colchester City Conservative Councillor Group

January 2025

(Note: this submission is a general response on the wider plan, individual Councillors will respond in more detail regarding their individual ward areas)

Introduction

The draft Preferred Options Local Plan proposes an increase in Colchester's annual housing requirement from an already demanding 920 dwellings per year to a minimum of 1,300 dwellings, with the potential for this to rise to 1,560 dwellings per year once the Government's buffer is applied. This represents an extraordinary level of growth, compounded by forecast population growth of 17.3% by 2041, in a City which many residents already feel is under acute pressure from existing development.

We recognise that National Government Policy has seen housing targets reduced in many metropolitan areas with good infrastructure already in place and instead placed more burden on places like Colchester with acknowledged infrastructure deficits.

The Conservative Group does not dispute the reality of the housing crisis, nor do we oppose new homes in principle. We recognise the acute challenges of affordability, availability, and access to housing, particularly for younger people and families.

However, our fundamental test of this Local Plan is not whether it meets the numbers on paper, but whether it delivers those homes in a way that is genuinely sustainable, properly infrastructure-led, and fair both to existing communities and future residents.

On that test, the plan as currently drafted fails.

The Conservative Group's overriding concern is that the draft Plan does not credibly demonstrate how the infrastructure required to support this scale of growth will be delivered or funded.

Residents rightly ask a simple question:

Will this plan deliver homes without leaving roads gridlocked, GP surgeries overwhelmed, hospitals under unsustainable pressure, schools oversubscribed, public transport inadequate, and environmental assets degraded?

Our regrettable conclusion is that, as drafted, it will not.

We outline some of our specific objections and concerns with regard to the individual policies below together with some recommendations. We would also make a general recommendation as follows.

Experience shows that vague or conditional policy wording invites delay, dilution, and circumvention. If this plan is to command confidence, its infrastructure policies must be explicit, enforceable, and unambiguous.

We strongly recommend that major site allocations and infrastructure dependencies are framed using clear “infrastructure-first” triggers, similar to those employed successfully elsewhere in the adopted Local Plan and at the Tendring–Colchester Borders Garden Community.

For example:

- “No planning permission shall be granted until the identified infrastructure has full planning consent and funding secured.” which would result in policy requirements such as “No planning permission can be granted for Land South of Marks Tey Village until the Rapid Transport Eastern Extension from Colchester City Centre to Marks Tey has planning permission and funding has been secured.”

Without such clarity, there is a real risk that housing delivery will outpace infrastructure provision, to the detriment of communities.

ST7 - Infrastructure Delivery and Impact Mitigation

The Infrastructure Audit and Delivery Plan in the Stage 3 report (October 2025) identifies the required infrastructure to make the housing development sustainable. The plan gives estimated costs of each project and identifies funding already secured or likely to be secured via a source already identified. The difference between the total cost of the projects and the total of funding already secured is described as the “funding gap” and is the amount of money which needs to be generated from the new developments (primarily via developer contributions).

The Infrastructure Audit and Delivery Plan identifies a substantial infrastructure funding gap. From the figures currently provided, we calculate this to be in excess of £800 million, even before accounting for a significant number of schemes which remain uncoded or marked “TBC” and will not be coded until post Regulation 18 once consultees have responded. Once costs for healthcare, education, waste management, public transport, cultural facilities and other critical infrastructure are fully quantified, the gap will inevitably grow further.

We also note objections from Anglian Water to some of the proposed site allocations and the potential required restrictions on daily water usage, an issue which must be convincingly addressed before any of these sites are allocated.

Crucially, the plan does not convincingly demonstrate that this gap can be closed through developer contributions alone. Viability evidence suggests that a shortfall of around £400 million remains even on optimistic assumptions, yet clarity on the agreed figure has been notably lacking, including during formal committee discussions.

Without a transparent, evidenced, and deliverable funding strategy, the plan cannot be considered sound.

Before the plan progresses beyond Regulation 18, the following are essential:

- Full costing of all currently unpriced infrastructure schemes
- Clear and agreed identification of the total infrastructure funding gap
- Transparent evidence of how that gap will be closed
- Serious consideration of a mandatory Community Infrastructure Levy (CIL), rather than treating it as an optional future consideration

NZ1: Net Zero Carbon Development

Our questions on this policy relates to cost and value. We feel a further explanation of exactly what is being delivered is warranted.

While we support the objective of reducing carbon emissions, the policy adds an estimated £215 million to development costs. Greater clarity is required on what this delivers, whether it represents value for money, and whether elements of this funding could more effectively be directed toward critical infrastructure deficits without undermining environmental outcomes.

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Policy PC2 - Active and Sustainable Travel

We agree with the stated basic aim that “All new development should be planned around a network of safe and accessible active travel routes”.

We support the principle of improved walking, cycling, and public transport, but reject a one-size-fits-all approach that ignores settlement patterns and lived reality.

Many proposed allocations—particularly in rural and semi-rural communities—are not located where a genuine choice of transport modes exists. The overwhelming majority of journeys from these sites will continue to be made by car, regardless of aspiration.

We are also concerned that many site allocations appear to have been selected before the completion of key infrastructure and transport evidence, and on the assumption that major strategic schemes—particularly the A12 upgrade—would proceed.

This raises serious questions. Essex County Council has previously described the A12 upgrade as essential for housing growth and economic prosperity, yet the draft plan now appears to proceed as if it is optional or no longer required, without providing robust evidence to justify that change in position.

The A12 is already over capacity along with the A120 and the Colchester area is frequently beset by delays and congestion. This provides unreliable journey times with people unable to get to work, businesses unable to get to their customers and goods unable to be delivered. This is an inevitable constraint on the economic growth of the area (a stated aim of the plan) and makes it more difficult for businesses to prosper. We believe this plan will only make the situation worse

The Conservative Group is not persuaded that the transport evidence underpinning the spatial strategy is either current or realistic, particularly given the well-documented congestion on the A12, A120, and local road network.

We would also ask what consideration has been given to allocations from Braintree District Council as regards Junction 25 of the A12.

We also note that many of the larger public transport projects listed are either uncoded, unfunded or have not been tested for practical deliverability.

Whilst we support the provision of better walking and cycling routes together with improved public transport we also question the balance between the funding of those compared to road transport improvements in the plan.

The plan's infrastructure delivery plan allocates £195m for cycle paths, £35m for walking routes and £13m for mobility hubs. However, it only allocates £67m for public transport (most of which is unfunded and unproven to be deliverable such as the proposed Marks Tey RTS) and a paltry £52m for highways..

We support the policy of "Incorporate infrastructure provision for charging electric vehicles in line with the latest guidance and standards, and make provision for charging electric bicycles" but those must be clearly defined. In particular the provision of a low powered (AC) charging point should be a minimum of 32 amps (7.36kW) via a "Type 2" untethered connection and the definition of a "fast charger" should also be defined for which we would recommend 150kW CCS type connection.

We would also comment on the general definition of "low or zero carbon" travel and travel modes which have a detrimental effect on air quality. The UK has legislated that by 2030 the sale of non-hybrid or BEV (battery electric vehicle) cars and light goods vehicles will be banned with an increasing requirement of the percentage of the market to be such vehicles between now and 2030 (set at 30% in 2026). By 2035 the sale of all non-zero emissions cars will be banned. Furthermore the Government has stated that they plan for all electricity in the UK to be zero carbon generated by 2030.

With the average lifespan of a vehicle in the UK being just over ten years before scrapping, by the plan's end a significant majority of vehicles on the road will be zero emission and zero carbon in use. We would therefore suggest that by the plan's end cars and light goods vehicles will effectively be "zero carbon" transport and have no effect on air quality and the plan should recognise that.

Before the plan can progress the following much be addresses:

- Rebalancing of transport investment, including explicit recognition of the essential role of the A12 and A120.
- Realistic treatment of rural and semi-rural travel patterns.
- Recognition is given to that fact that cars cars and light goods vehicles will to all intents and purposes be zero carbon and zero emission forms of transport within the plan period.
- EV car and cycling charging provision is clearly defined.

ST5: Housing Need

Explanation is needed as to why the overall housing need numbers have been assessed on 16 years requirement rather than 15 years required by the plan.

Further explanation is required as to why the “windfall” delivery has been reduced to 50% of that in the previous plan and that experienced prior to COVID.

Policy ST3: Spatial Strategy

Newmark's viability methodology underpinning ST3 is flawed. It is skewed towards building on green fields and villages by attributing inflated values to commercial/brownfield city sites.

Demand for office-space has collapsed, eg: policy OA4 (surplus commercial land, C2), affecting values. The underpinning evidence therefore conflicts with 3.19. Furthermore the siloed approach of using a settlement hierarchy to allocate housing is flawed. It fails to account for the impact of large-scale development on small settlements. Mark's Tey and Eight Ash Green allocations negatively impact Aldham (key diagram).

The allocations clearly promote coalescence of villages contrary to ST4 (3.31).