

Dear Planning Policy Team,

I OBJECT to the proposed allocation of Site ID 10616 – Land north of Bromley Road, Colchester within the Preferred Options Local Plan.

My objection is based on the following material planning considerations, with reference to the National Planning Policy Framework (NPPF) and relevant Colchester Local Plan objectives.

1. Impact on Wildlife and Biodiversity (NPPF Sections 8 & 15)

Paragraphs 174, 175 and 180 of the NPPF require planning policies to avoid harm to biodiversity, protect priority habitats and species, and maintain ecological networks.

The site supports a wide range of protected and priority species and functions as an important wildlife corridor. I have personally observed the following species on and around the land: badgers, foxes, nesting buzzards with young, kestrels, red kites, jays, woodpeckers (including nesting birds), several species of bats, reptiles such as grass snakes and slow worms, barn owls, tawny owls, and water voles.

The presence of these species demonstrates that the site has high ecological value. Development of this scale would cause habitat loss, fragmentation, disturbance, and displacement that cannot be adequately avoided or mitigated, contrary to NPPF paragraph 180(a).

2. Harm to Trees, Ancient Trees, and Woodland (NPPF Paragraph 180(c))

The site contains mature trees and areas of woodland that contribute significantly to biodiversity, landscape character, and climate resilience. Some trees may qualify as ancient or veteran trees, which the NPPF identifies as irreplaceable habitats.

Paragraph 180(c) states that development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons, which have not been demonstrated for this allocation.

3. Streams, Waterways, and Associated Habitats (NPPF Paragraphs 174 & 180)

The land contains streams and watercourses that support sensitive habitats and species including water voles, badgers, woodpeckers, foxes, deer, and nesting buzzards.

Development would risk pollution, altered hydrology, and ecological degradation, contrary to NPPF paragraph 174(a).

4. Flood Risk and Loss of Permeable Land (NPPF Paragraphs 159 & 174(e))

Although the site itself may not lie within a formal flood zone, it currently functions as permeable greenfield land that absorbs surface water and regulates natural drainage.

Development would significantly reduce permeability, increasing surface water runoff and flood risk downstream, where existing residential properties are located closer to the main salary stream. This would conflict with NPPF paragraph 159, which requires development to avoid increasing flood risk elsewhere, and paragraph 174(e) which seeks climate resilience.

5. Transport, Traffic, and Cumulative Highway Impacts (NPPF Section 9)

Paragraphs 104, 105 and 110 of the NPPF require development to prioritise sustainable transport and ensure cumulative impacts on the transport network are acceptable.

Bromley Road already experiences significant congestion due to recent housing developments, which will be further exacerbated by planned growth in Ardleigh and Elmstead Market. Parsons Heath and Harwich Road already suffer from congestion and are primary routes into Colchester and to the railway station for cars, buses, cyclists, and pedestrians.

The Local Plan fails to adequately assess the cumulative impact of existing, consented, and proposed development on these routes, contrary to NPPF paragraph 110(a).

6. Unsustainable Location and Car Dependency (NPPF Paragraphs 104 & 105)

The site is not located where future residents could reasonably meet daily needs by walking, cycling, or public transport. As a result, development would be inherently car-dependent, increasing congestion, emissions, and pressure on already constrained roads.

7. Loss of Valued Greenfield Land Used by the Community (NPPF Section 8)

Paragraphs 92 and 98 of the NPPF emphasise the importance of access to open space to support physical and mental wellbeing.

This land is used informally by the local community for walking, recreation, and connection with nature. Its loss would remove an important green space that supports mental health, wellbeing, and quality of life.

8. Alignment with Colchester Local Plan Objectives (Supporting Policy Context)

In addition to conflicts with national policy, the allocation of Site ID 10616 is inconsistent with Colchester Local Plan objectives that seek to:

- Protect and enhance biodiversity and green infrastructure
- Safeguard valued landscapes and countryside character
- Ensure development is supported by adequate transport and community infrastructure
- Promote healthy, sustainable communities

The inclusion of this site undermines these locally defined priorities by allocating ecologically valuable greenfield land in a location constrained by highway capacity and infrastructure limitations.

9. Lack of Evidence and Failure of Plan Soundness (NPPF Paragraph 35)

The allocation of Site ID 10616 is not supported by proportionate or robust evidence, as required by NPPF paragraph 35, which states that Local Plans must be justified, effective, and consistent with national policy.

In particular:

- No detailed ecological survey evidence has been provided despite clear indicators of protected species
- No funded or deliverable highways mitigation strategy is identified
- No clear infrastructure delivery plan demonstrates impacts can be adequately addressed

The site therefore cannot be demonstrated to be justified or effective, rendering the Plan unsound.

Conclusion

For the reasons set out above — including unacceptable ecological harm, loss of irreplaceable habitats, increased downstream flood risk, severe cumulative highway impacts, unsustainable location, loss of valued community green space, and lack of supporting evidence — the allocation of Site ID 10616 is not consistent with the NPPF or Colchester Local Plan objectives.

I therefore strongly request that Site ID 10616 is removed from the Local Plan, and that alternative, more sustainable sites are considered.

Yours sincerely,

Matthew Pilley