



**LOCAL PLAN**  
**RESPONSE**

**Colchester City Council**  
**Local Plan**

Regulation 18  
Preferred Options

Land South of Halstead Road, Eight Ash Green

**On behalf of** Cala Homes  
(North Home Counties) and Angle Homes

January 2026

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## 1. INTRODUCTION

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- 1.1 This representation is submitted to Colchester City Council ('the Council') on behalf of Cala Homes (North Home Counties) and Angle Homes in respect of the published evidence base to support the emerging Local Plan, and the most recent Regulation 18 (Preferred Options) Draft Local Plan ('PODLP') and accompanying documents.
- 1.2 This representation relates to Land south of Halstead Road, Eight Ash Green ('the Site') which was submitted as part of the Council's Call for Sites process in February 2024 for residential allocation in the emerging Local Plan. The Site has been assessed as part of the Council's site selection process under reference 10760.
- 1.3 The PODLP was presented to the Council's Local Plan Committee on 17 February 2025, seeking support from Members to publish it for a 6-week public consultation as soon as reasonably able to. The published documents presented to Planning Committee were as follows:
  - Regulation 18 (Preferred Options) Draft Local Plan
  - Regulation 18 (Preferred Options) Policies Maps
  - Sustainability Appraisal Report for Regulation 18 (Preferred Options) Draft Local Plan
- 1.4 It was however not agreed for consultation, pending further work on infrastructure, particularly the Infrastructure Delivery Plan ('IDP') with concerns of the late availability of evidence base, lack of transparency in site selection and deliverability.
- 1.5 It was agreed by Members to postpone a public consultation until Stage 4 of the IDP is complete to allow for a full set of costings for infrastructure delivery.
- 1.6 A new Local Development Scheme ('LDS') was presented to and endorsed by the Local Plan Committee on 4 March 2025, setting out a revised timetable for the emerging Local Plan. The adopted LDS (March 2025) confirmed a public consultation on the PODLP in December 2025 and anticipates expected adoption of the Plan in May 2027.
- 1.7 Following approval by Colchester City Council at Local Plan Committee on 10<sup>th</sup> November 2025, the PODLP has been published for a 6-week public consultation from 26<sup>th</sup> November 2025 to 14<sup>th</sup> January 2026.
- 1.8 The PODLP identifies proposed housing growth towards the settlement of Eight Ash Green, which is identified to receive 430 new dwellings across two proposed allocations:

- Land north of Halstead Road and east of Wood Lane (reference 10656) – 180 dwellings
  - Land north of Halstead Road and west of Fiddlers Wood (reference 10090) – 250 dwellings
- 1.9 The Site has not been identified as a proposed draft residential allocation in the PODLP, despite being assessed as suitable, available and achievable within the Council's 2024 SLAA Stage 2 Report and having near identical assessments to the sites identified as draft allocations elsewhere in the settlement, when appraised by the 2025 Sustainability Appraisal Report.
- 1.10 Notwithstanding the additional evidence base, including the various topic papers published in support of the PODLP (discussed in detail in Section 3 of this representation), and having regard to the Sustainability Appraisal Report, it is not clear as to why the Site at this stage was proposed to be rejected in the latest iteration of the PODLP. Nor do we consider the assessment and site selection process to be robust or appropriately justified with regards to the selection of sites 10656 (PP31) and 10090 (PP32) for residential allocation within the PODLP over the Site, especially having regard to the Summary of Sites Evidence (2025).
- 1.11 This is particularly evident with regards to site 10090 (PP32) which is currently the subject of an outline planning application (ref: 251310) for the erection of up to 250 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Halstead Road. Internal access and all other matters are reserved but the application is currently the subject of significant objections raised by technical statutory consultees on landscape and impact to Fiddler's Wood, two areas of concern we have flagged as part of our critique of the Sustainability Appraisal. In addition, Eight Ash Green Parish Council have objected to this application, noting that the site lies within the boundary of Aldham Parish Council, despite being adjacent to Eight Ash Green. In their objection letter, Eight Ash Green Parish Council express concerns that this would create a complex management structure and uncertainty regarding S106 monies.
- 1.12 Cala Homes have engaged with Eight Ash Green Parish Council regarding the Site. Cala Homes have held meetings with the Parish Council in September and November 2025. Through these meetings it was established that the Parish Council may consider the Site as an alternative to those included in the PODLP, including it as part of their consultation with residents on the proposed allocations and potential alternatives.
- 1.13 We are hopeful that the technical work accompanying this representation in support of the Site's deliverability and suitability for future residential development, coupled with a comprehensive review of the current preferred residential allocations will provide a clear case in favour of the Site's allocation in the PODLP and future iterations up to and including adoption of a new Local Plan.

1.14 Representations are being made on the following documents:

- PODLP & Policies Map (February 2025)
- PODLP Sustainability Appraisal Report (February 2025)
- Strategic Land Availability Assessment Stage 2 Report (February 2025)
- Colchester Local Plan Review Transport Evidence (February 2025)
- Environment Topic Paper (July 2025)
- Housing Topic Paper (November 2025)
- Infrastructure Topic Paper (November 2025)
- Site Allocation Process (October 2025)
- Spatial Strategy Topic Paper (October 2025)
- Transport Topic Paper (November 2025)
- Further Transport Evidence (October 2025)
- Colchester Infrastructure Audit and Delivery Plan (IADP) (October 2025)

1.15 We also discuss the Site in the context of the Eight Ash Green Neighbourhood Plan ('EAGNP') made December 2019, and how promotion of the Site can strongly align with the objectives and aspirations set out within the EAGNP.

## 2. DRAFT REGULATION 18 (PREFERRED OPTIONS) LOCAL PLAN

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- 2.1 The PODLP presented to the Local Plan Committee identifies a minimum housing requirement of 20,800 new homes (1,300 per annum) over the plan period 2025 – 2041. It plans for a total of 21,106 net new homes, with 11,089 new homes identified through proposed Local Plan allocations.
- 2.2 The Council are planning for a minimum housing requirement as calculated by the Standard Method, as required by para. 62 of the NPPF, which has informed the basis of the Council's minimum housing requirement.
- 2.3 We support the proposed minimum housing requirement and the housing supply comprising 11,089 homes through new Local Plan allocations. However, there does not appear to be a buffer built into the total projected housing supply at Table ST5.1 of the PODLP at this stage.
- 2.4 The Written Ministerial Statements (WMS) of 30 July 2024 and 12 December 2024 underline the urgency of tackling the housing crisis through increased supply. These statements reinforce the Government's expectation that local authorities adopt a proactive and ambitious approach to meeting housing needs and maximising delivery wherever possible. Failure to respond to this national policy direction could result in the Local Plan being deemed inconsistent with Government priorities.
- 2.5 The recent November budget (2025) reinforces the government's commitment to "get Britain building", tying housebuilding and planning reform directly to economic growth and productivity. The Budget sits alongside the Planning and Infrastructure Bill and the updated national planning framework, with a continued emphasis on significantly boosting housing delivery through faster, more certain planning decisions and strategic investment in infrastructure and regeneration, further reinforced by the current consultation on the proposed revisions to the National Planning Policy Framework.
- 2.6 The Office for Budget Responsibility (OBR) forecast a rise in net additional dwellings towards roughly 300,000 homes per year by the end of the decade as reforms and funding measures take effect. This reinforces the importance of Local Planning Authorities, such as Colchester, planning positively for growth, maintaining a robust and deliverable housing land supply, and ensuring that suitable, sustainable sites are allocated and brought forward without unnecessary delay.
- 2.7 The OBR also highlights that housing delivery is likely to dip in the short term, before increasing as the planning and infrastructure reforms bed in and funding streams ramp up. This "trough then

increase” profile underlines that the mid-2020s are a critical period to keep the pipeline of consented and allocated sites moving, so that national housing ambitions can actually be realised on the ground. In this context, Colchester’s local plan has a key role in ensuring that housing trajectories are not constrained by policy or land-supply gaps and that the area can contribute fully to national and regional housing targets.

- 2.8 The Budget also emphasises the need to align planning with strategic infrastructure and regeneration investment, with national funding streams and the Planning and Infrastructure Bill aimed at accelerating delivery of new homes and associated infrastructure. This strengthens the case for identifying and supporting well-located housing sites in Colchester that can be viably serviced and that contribute to wider regeneration, economic growth and infrastructure objectives. A positively-prepared local plan that supports timely housing delivery in Colchester is therefore consistent with, and directly supported by, the government’s latest fiscal and planning policy direction.
- 2.9 Use of a buffer is also consistent with national policy, with the NPPF not only requiring a Local Plan to meet its objectively assessed development needs in full but to do so through a considered strategy which engenders sufficient flexibility to adapt and respond to rapid change.
- 2.10 To ensure sufficient flexibility, the emerging Local Plan must account for the fact that both housing need and housing supply will inevitably fluctuate throughout the Plan period due to a number of factors, including changes to population projections and affordability ratios, and sites failing to come forward as anticipated. Sufficient headroom is required over the Plan period to respond rapidly to these changes.
- 2.11 Should the Council seek to introduce a supply buffer, the Council would be required to find additional sites in sustainable locations that align with the preferred spatial strategy. Growth in Colchester is focused on the most sustainable and accessible locations, including urban areas, transport corridors, and existing centres with employment, services, and travel options. Additionally, development is distributed across large, medium, and some small settlements based on local opportunities and constraints, helping to sustain essential services and facilities.
- 2.12 The preferred spatial strategy is derived from a combination of seven spatial options put forward and appraised through the Sustainability Appraisal:
- Option 1: Continuing existing spatial strategy
  - Option 2: New Garden Community
  - Option 3: Garden Suburbs
  - Option 4: Intensification in the City Centre

- Option 5: Transport Corridors
  - Option 6: Hubs and Spokes
  - Option 7: Environment led
- 2.13 The spatial strategy takes forward the best and most promising elements of each of the spatial options in order to put forward a strategy that secures sustainable development across Colchester. We have no concerns with the proposed spatial strategy which critically proposes housing growth to sustainable settlements such as Eight Ash Green.
- 2.14 Eight Ash Green is identified as a 'Medium' settlement which is defined at para. 12.25 of the PODLP as:
- "[...] settlements with a range of community and social infrastructure but to a lesser extent than the infrastructure within the larger settlements. These medium settlements are capable of accommodating growth appropriate to the size, scale and infrastructure of the settlement."*
- 2.15 Eight Ash Green is a sustainable settlement, capable of accommodating meaningful levels of housing growth, proportionate to its scale and range of services and social infrastructure. The village has a population of approximately 1,700 people and is well served by local services and facilities, including two schools, a village hall, All Saints Church, a doctors surgery, Spar convenience store and The Cricketers Pub. Stanway Retail Park is also only five minutes' drive from the Site, offering a wide range of shops and services. The village is well served by public transport, with various bus services that run along Halstead Road between Halstead, Stanway and Colchester. The bus services are regular with buses approximately every 15 minutes.
- 2.16 The PODLP has sought to allocate 430 homes in Eight Ash Green, across two allocations:
- Land north of Halstead Road and east of Wood Lane (reference 10656 / Policy PP31) – 180 dwellings
  - Land north of Halstead Road and west of Fiddlers Wood (reference 10090 / Policy PP32) – 250 dwellings
- 2.17 It is not clear what has led the Council to allocate this amount of new housing in Eight Ash Green, with neither the Sustainability Appraisal nor the PODLP setting out clearly the number of homes per settlement within the proposed settlement hierarchy. Indeed, the publication of the Spatial Strategy Topic Paper (2025) notes at para. 4.32 that medium settlements (of which Eight Ash Green is identified as) are *"capable of accommodating growth appropriate to the size, scale, infrastructure and constraints of the settlement"* which we do not dispute, but does not then provide any further analysis on how the capacity of such settlements is arrived at. For example, the Colchester Settlements Evidence Stage 1 Report (2024) sets out the current profile for each settlement and identifies high

level opportunities and constraints for each location which may be relevant considerations informing other evidence, and Plan making, and the Stage 2 Report simply evidences the settlement boundary changes arising from the preferred allocations – no assessment of capacity in either document is evident.

- 2.18 It is also not clear as to whether this is based on an assessment of settlement capacity (and if so, the methodology and assessment itself appears absent in the evidence base) or if it is on identification of the most appropriate and suitable sites (which in the case of Eight Ash Green, the evidence base does not clearly set out why the two sites that have been proposed for allocation were chosen over the Site south of Halstead Road). It does of course provide reasons for their allocation within the Summary of Sites Evidence Paper (2025) (which is scrutinised in detail later in this representation) but does not set out clear reasons for their choosing over alternative sites, such as land south of Halstead Road which is also absent from the sustainability appraisal.
- 2.19 It is considered that given the scale of housing need in Colchester, the need to build in a supply buffer into the overall housing supply over the plan period and the overarching national objective of substantially increasing the delivery of housing, additional homes in Eight Ash Green over and above the 430 homes identified in the PODLP (given its sustainability credentials and capacity for further growth) is entirely appropriate.
- 2.20 Notwithstanding the fact that we consider the Site south of Halstead Road to be more suitable and deliverable than either draft allocation in Eight Ash Green (discussed in following sections throughout this representation), the Council may consider that Eight Ash Green has the capacity to sustainably accommodate all three sites within the early years of the plan period.

### 3. REVIEW OF EVIDENCE BASE

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#### Topic Papers

##### Environment Topic Paper (July 2025)

- 3.1 The Environment Topic Paper brings together landscape, ecology, biodiversity net gain, and Habitats Regulations considerations. In respect of Eight Ash Green, the paper identifies that Site 10090 (PP32) is subject to specific ecological sensitivities, including potential wintering bird constraints and its proximity to Ancient Woodland. No equivalent site-specific ecological constraints are identified for this Site 10760 (Land South of Halstead Road). While Sites 10656 (PP31) and 10760 (Land South of Halstead Road) are assessed as having environmental constraints typical of greenfield sites, the Topic Paper clearly distinguishes Site 10090 (PP32) as presenting heightened environmental risk. This differentiation is material, as it demonstrates that environmental effects are not uniform across the three sites, and that Site 10090 (PP32) is inherently more constrained than both 10656 (PP31) and Site 10760.

##### Housing Topic Paper (November 2025)

- 3.2 The Housing Topic Paper addresses overall housing need, supply, and spatial distribution. It proposes that 430 dwellings are allocated in Eight Ash Green through a combination of 10656 (PP31) and 10090 (PP32). The evidence base also indicates that the Plan includes only a modest buffer above minimum housing need, placing importance on deliverability and flexibility. In this context, the Housing Topic Paper does not identify any reason why additional or alternative sites at Eight Ash Green—such as Site 10760—should be discounted. Rather, the evidence supports the principle that additional deliverable sites could strengthen the Plan's resilience, particularly where they do not introduce additional environmental or infrastructure constraints beyond those already accepted at the settlement.

##### Infrastructure Topic Paper (November 2025)

- 3.3 The Infrastructure Topic Paper and accompanying Infrastructure Delivery Plan identify the infrastructure requirements associated with growth at Eight Ash Green, including green infrastructure, community facilities, transport contributions and utilities. These requirements are framed at settlement level and apply equally to Sites 10656 (PP31), 10090 (PP32) and any additional sites brought forward at Eight Ash Green. The Topic Paper does not identify any infrastructure

constraint unique to the Site, nor does it suggest that infrastructure delivery is contingent upon development being located north of Halstead Road. As such, the evidence indicates that Site 10760 could contribute proportionately to infrastructure provision in the same manner as Sites 10656 (PP31) and 10090 (PP32).

Site Allocation Process Topic Paper (October 2025)

- 3.4 The Site Allocation Process Topic Paper explains the methodology used to assess sites through the SLAA and Sustainability Appraisal. It confirms that site selection should be based on a transparent audit trail, comparative assessment, and consideration of reasonable alternatives. While the process is described in detail, the Topic Paper itself does not provide site-by-site scoring. Importantly, it does not identify any methodological reason as to why the Site is any less sustainable than Sites 10656 (PP31) or 10090 (PP32). The omission of the Site therefore appears to arise from settlement-level judgements rather than from any constraint identified through the allocation methodology itself.

Spatial Strategy Topic Paper (October 2025)

- 3.5 The Spatial Strategy Topic Paper establishes the overall growth distribution, identifying Eight Ash Green as a sustainable settlement suitable for growth. The strategy does not distinguish between land north or south of Halstead Road, focusing instead on settlement function, accessibility and relationship to Colchester. Within this framework, Sites 10656 (PP31), 10090 (PP32) and 10760 all fall within the same settlement context. The Topic Paper does not identify any spatial strategy conflict arising specifically from development south of Halstead Road, indicating that Site 10760 is aligned with the broad spatial approach.

Transport Topic Paper (November 2025)

- 3.6 The Transport Topic Paper addresses strategic connectivity, active travel, and the role of Rapid Transit System (RTS) corridors and mobility hubs. In relation to Eight Ash Green, the paper confirms that development at PP31 and PP32 will require improved walking, cycling and public transport connections. These requirements are settlement-wide rather than site-specific. The evidence does not identify any inherent transport constraint affecting Site 10760 that would not also apply to sites located north of Halstead Road. Instead, transport considerations form the principal basis for the Council's severance concern, which is not rooted in the Topic Paper itself but rather in broader settlement-level judgement.

Colchester Infrastructure Audit and Delivery Plan (IADP) (October 2025)

- 3.7 The Colchester Infrastructure Audit and Development Plan (October 2025) identifies the infrastructure which is required to meet the growth anticipated in Colchester over the Local Plan

period to 2041. It sets out the active travel routes that are key to the Local Plan's growth mitigation package. In addition, it identifies the need for a network of mobility hubs across Colchester. This includes the following:

- Eight Ash Green mobility hub – cost £506,880 with funding not secured and anticipated that 25% will be secured from preferred allocations and 25% from reference case developments.
- Walking route from Eight Ash Green to Stanway (connecting to the new Rapid Transit System) – cost £1,536,000 with funding not secured and 50% will be secured from preferred allocations.

Colchester Local Plan Review: Further Transport Evidence (October 2025)

3.8 This report sets out the evidence on the transport impact of preferred site allocations and a vision-based approach to mitigation. The report expands on initial transport evidence published in February 2025. This evidence found that the A12 Junction 26 operates over-capacity and considers that the junction experiences peak hour queueing. Development in the area will add pressure to the network and measures are likely to be required to help mitigate this impact. The Local Plan states in Adopted Local Plan Policy WC5 that development in West Colchester will be expected to contribute to a package of sustainable transport measures (improvements to current bus services and routes and to the existing cycle and walking network) as well as improvements to the A12 J26 where it is demonstrated that proposals will impact the highway network.

3.9 There are agreed proposals for minor improvements to this junction although these are considered to be unlikely to provide significant capacity improvements. National Highways has indicated that there are constraints to providing further physical measures and opportunities to increase capacity are limited. Solutions to mitigate congestion at the A12 junctions will likely focus instead on modal shift away from the private car. The Further Transport Evidence (October 2025) states that the preferred strategy is to concentrate investment in traffic management solutions by:

- extending signalisation to the Essex Yeomanry Way/Western Approach to Junction 26 and Junction 27 Spring Lane roundabout; and,
- co-ordinating new and existing signals through urban traffic control systems to dynamically manage traffic, respond to incidents in real time and prioritise green time for public transport and pedestrian/cycle crossings, which will assist Junctions 25 through to 29.

Settlements Evidence Stage 2 Report (2024)

3.10 The Settlement Evidence Stage 2 Report forms part of the Local Plan evidence base and primarily provides background on the methodology used to define settlement boundaries. It summarises assessments for each settlement, offers contextual information informing those assessments, and

identifies proposed alterations to the settlement boundaries. However, the report does not present any additional or updated evidence regarding the character, capacity, or relative suitability of individual settlements to accommodate future growth. Its function is largely descriptive, illustrating boundary changes to align with the Council's preferred site allocations rather than offering an objective or proportionate evidence base to justify the chosen spatial approach.

3.11 Thus, the document has no bearing on the analysis of settlement capacity or site suitability.

#### Summary of Sites Evidence

3.12 The Summary of Sites Evidence underpinning the Preferred Options Local Plan purport to assess sites on a broadly consistent basis, drawing on high-level constraints mapping, topic-based scoring, and professional judgement.

3.13 However, when the assessments for Sites 10656 (PP31) and 10090 (PP32) are examined alongside live planning evidence, including consultee objections to the outline application on Site 10090 (PP32), it is clear that the site selection process places disproportionate weight on abstract, desk-based criteria, while materially underplaying irreplaceable environmental harm and real-world delivery constraints.

3.14 This imbalance is particularly acute in relation to ancient woodland, where national policy requires a precautionary and harm-avoidance approach, yet the evidence base treats impacts largely as a matter capable of mitigation, rather than a fundamental constraint.

3.15 Site 10090 (PP32) lies immediately adjacent to Fiddlers Wood, an area of ancient woodland and irreplaceable habitat. This relationship is not incidental; it is intrinsic to the site's configuration and developable area. While the site assessment acknowledges the presence of ancient woodland, it fails to translate this into a proportionate weighting against allocation.

3.16 The Summary of Sites Evidence records no statutory designation constraint (e.g. SSSI) and therefore scores the site relatively benignly in environmental terms

3.17 This approach is fundamentally flawed. Ancient woodland does not require statutory designation to warrant the highest level of protection. National policy is explicit that development resulting in loss or deterioration of ancient woodland should be refused unless wholly exceptional circumstances apply. The evidence base does not demonstrate that such a policy test has been meaningfully engaged with.

3.18 More critically, the Council's assessment does not reflect the indirect and cumulative impacts that have been clearly articulated by the Woodland Trust in response to the outline application. These

include increased recreational pressure, dog walking, lighting spill, noise, domestic predation, and long-term degradation of woodland condition. These impacts are not theoretical; they are well-established consequences of residential development adjacent to ancient woodland and are recognised by the Trust as effectively unavoidable.

- 3.19 The persistence of Woodland Trust objections, notwithstanding amendments and further technical submissions, is a clear indication that the harm is inherent to the site, not a matter of scheme design. Yet this reality is not reflected in the scoring or narrative justification for allocation.
- 3.20 In addition to ancient woodland impacts, Site 10090 (PP32) is subject to sustained objection from Place Services on landscape grounds. These objections demonstrate that the site occupies a visually exposed position on the Great Tey Farmland Plateau, contributing to long-distance views across the Colne Valley and reinforcing the rural setting of Eight Ash Green.
- 3.21 The site assessment evidence acknowledges landscape sensitivity only at a high level and appears to rely heavily on the absence of formal local landscape designations. This approach has been expressly challenged by Place Services, who emphasise that a lack of designation does not equate to lack of value and that the site's contribution to openness, tranquillity, and cross-valley views is significant.
- 3.22 The evidence base fails to grapple adequately with the scale of change involved: the permanent loss of an open agricultural landscape and its replacement with a large suburban extension at a prominent settlement edge. Nor does it adequately consider the cumulative effect of this development in extending Eight Ash Green further into open countryside, exacerbating settlement sprawl and eroding the rural transition that currently exists.
- 3.23 In addition, Site 10090 (PP32) has a 'very low' accessibility rating in Essex's Parking Standards assessment. The site is approximately 900m from the nearest bus stop, exceeding the recommended walking distance, which would necessitate additional infrastructure investment to improve access to public transport. The absence of a continuous footway network and the increased travel distances to key facilities make this site less sustainable in transport terms.
- 3.24 A further weakness in the justification for Site 10090 (Policy PP32) is the implicit assumption that mitigation—buffers, planting, SuDS, and green infrastructure—can adequately address the identified harms. The outline application process demonstrates that this assumption is not borne out in practice.
- 3.25 Substantial buffers from ancient woodland reduce the effective developable area and place pressure on viability and layout efficiency. At the same time, mitigation does not resolve the core

- policy objection: that harm to ancient woodland is irreversible and irreplaceable. The site assessment evidence does not test whether the site remains genuinely suitable once these constraints are fully internalised, nor does it acknowledge the risk that the site may ultimately prove undeliverable in policy terms.
- 3.26 By contrast, Site 10760 (Land south of Halstead Road) does not affect ancient woodland in any capacity. There is no direct or indirect relationship with irreplaceable habitats, and therefore no requirement for extensive buffers.
- 3.27 Landscape evidence demonstrates that Site 10760 benefits from stronger visual containment, a less prominent landform, and a more defensible settlement edge. While the site is not unconstrained, its limitations are conventional and manageable through design, rather than fundamental in nature. Importantly, none of the constraints associated with Site 10760 trigger the kind of policy conflict that arises at Site 10090 (PP32).
- 3.28 However, the Sustainability Appraisal and site selection work do not adequately differentiate between these materially different constraints. Both sites are treated as broadly comparable options, despite one presenting unavoidable harm to ancient woodland and the other avoiding such harm altogether.
- 3.29 When assessed against the matters set out above, the Council's justification for proposing to allocate Site 10090 (PP32) is not robust. The evidence base underestimates the weight that should be attached to harm to ancient woodland, treats landscape harm as a matter of professional disagreement rather than a policy conflict, and assumes deliverability in the face of unresolved statutory objections.
- 3.30 This represents a failure to apply a precautionary, policy-led balance. The outline application and consultee responses are clear, material indicators that Site 10090 (PP32) performs significantly worse than the evidence base suggests. These indicators should have fed back into the site assessment and Sustainability Appraisal, but plainly have not.
- 3.31 A proper review of both sites, grounded in live planning evidence rather than abstract scoring, leads to a clear conclusion. Site 10090 (PP32) is subject to fundamental constraints—most notably harm to ancient woodland and significant landscape impact—that should weigh heavily, and decisively, against its allocation. These harms are not capable of being mitigated to an acceptable level and have been persistently identified by expert consultees.
- 3.32 By contrast, Site 10760 avoids these critical constraints entirely and represents a materially less harmful and more policy-compliant option. The failure of the site assessment evidence and

Sustainability Appraisal to reflect this distinction undermines the soundness of the site selection process. Once the overlooked and underestimated harms are properly accounted for, the balance clearly favours the allocation of Land South of Halstead Road over Site 10090 (PP32).

- 3.33 Unlike Land South of Halstead Road, Site 10656 (PP31) lacks strong boundary vegetation, making it more visually prominent from public viewpoints, particularly from the north and along public footpaths. The Landscape and Visual Promotion Report prepared by Liz Lake Associates (January 2026) identifies that development at Site 10656 (PP31) would disrupt the existing settlement pattern of Eight Ash Green by extending built form into open countryside. The lack of visual containment, combined with the site's position on higher ground, results in a more significant visual impact when compared to Land South of Halstead Road. The required mitigation measures, such as extensive tree planting and landscape buffers, would be insufficient to fully integrate development into the existing landscape.

## 4. TECHNICAL REVIEW & SUMMARY OF EIGHT ASH GREEN SITES

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- 4.1 Following a review of the PODLP, further technical work has been carried out in respect of landscape, ecology, highways and heritage. This has been undertaken to establish the technical credentials of the site and scrutinise the evidence base which underpins the proposed Eight Ash Green residential allocations in the PODLP.
- 4.2 The following technical documents are accompanying this submission:
- Landscape and Visual Promotion Report
  - Ecology Technical Note
  - Built Heritage Note
  - Transport Technical Note

### **Landscape and Visual Promotion Report**

#### Assessment of Landscape Findings on Land South of Halstead Road

- 4.3 The Landscape and Visual Promotion Report for Land South of Halstead Road, Eight Ash Green, prepared by Liz Lake Associates (January 2026), provides a comprehensive assessment of the site's landscape characteristics and visual impact. The site comprises 6.11 hectares of arable land, enclosed by mature hedgerows and trees, which provide a strong landscape framework and limit visibility from surrounding viewpoints. The land gently slopes northward, reinforcing its visual containment within the broader landscape.
- 4.4 The site lies within the Easthorpe Farmland Plateau (B2) Landscape Character Area, adjacent to the Great Tey Farmland Plateau (B4) and the Colne River Valley Slopes (A5), making it a transitional landscape with characteristics from all three LCAs. The assessment confirms that the site is representative of the wider agricultural landscape, with an overall rural, but not remote, character, and a low-moderate level of visual prominence due to the strength of boundary vegetation and existing landscape framework. The assessment highlights the site's potential to integrate with the existing settlement pattern without causing significant harm to the surrounding rural character,

provided development is set back behind a new village green fronting Halstead Road and existing boundary vegetation is retained and reinforced.

- 4.5 The assessment highlights the site's potential to integrate with the existing settlement pattern without causing significant harm to the surrounding rural character. Furthermore, opportunities exist to enhance the landscape through the partial reintroduction of historic hedgerows, the creation of new green infrastructure links, a village green with orchard planting, and the provision of an open space buffer adjacent to Seven Star Green Local Wildlife Site (LWS).
- 4.6 In response to pre-application comments, the landscape promotion report now more explicitly addresses the landscape strategy for the B2 Easthorpe Farmland Plateau, including the partial re-introduction of traditional orchards and the need to conserve and enhance existing hedgerow networks. The revised feasibility layout therefore includes a community orchard within the north-western part of the site, alongside a robust landscaped buffer along the western boundary that will incorporate wildflower meadow, native tree and scrub planting to maintain separation from Turkey Cock Lane properties and protect the setting of nearby listed buildings.

Assessment of Landscape Findings for Site PP31 - Land North of Halstead Road (East of Wood Lane)

- 4.7 The land north of Halstead Road (east of Wood Lane) is a large open arable field with minimal structural vegetation, making it highly exposed within the landscape. Unlike Land South of Halstead Road, this site lacks strong boundary vegetation, making it more visually prominent from public viewpoints, particularly from the north and along public footpaths.
- 4.8 The assessment identifies that development at this location would disrupt the existing settlement pattern of Eight Ash Green by extending built form into open countryside. The lack of visual containment, combined with the site's position on higher ground, results in a more significant visual impact when compared to Land South of Halstead Road. The required mitigation measures, such as extensive tree planting and landscape buffers, would be insufficient to fully integrate development into the existing landscape.

Assessment of Landscape Findings for Site PP32 - Land West of Fiddlers Wood

- 4.9 This site comprises open arable land but is even more visually exposed than Land North of Halstead Road (East of Wood Lane). Situated adjacent to extensive ancient woodland, the site lacks the necessary landscape containment to accommodate new development without significantly altering the character of the area. Public footpaths running through and adjacent to the site provide multiple viewpoints where development would be highly visible.

4.10 The assessment concludes that any development in this location would have a substantial adverse impact on the rural landscape setting. The introduction of built form would extend the settlement further into the open countryside, leading to urban encroachment and diminishing the separation between Eight Ash Green and the surrounding rural landscape. The sensitivity of the ancient woodland and the requirement for extensive buffer zones further limits the developable area, making it a less suitable site compared to Land South of Halstead Road.

#### Concluding Assessment on Land South of Halstead Road

- 4.11 In landscape terms, Land South of Halstead Road is more suitable for future residential development than the other Eight Ash Green sites which are currently proposed as residential allocations within the PODLP. The Site benefits from strong boundary vegetation, ensuring high levels of visual containment, and is well-related to the existing settlement structure. Unlike the site to the west, development will not sprawl into open arable landscape or encroach upon sensitive ancient woodland. The updated landscape promotion report confirms that the site's well-defined vegetated boundaries, gently domed landform and ability to accommodate a layout set back behind a village green ensure high levels of visual containment and avoid harmful coalescence between the two parts of Eight Ash Green. Unlike the sites to the north of Halstead Road, development will not sprawl into open arable landscape in prominent locations or encroach upon sensitive ancient woodland, and can instead deliver a coherent extension that reflects the existing settlement pattern.
- 4.12 The opportunity to enhance green infrastructure, provide public open spaces, and reinforce existing landscape features to retain and enhance boundary vegetation, introduce historic field boundaries, provide a village green with orchard, and deliver a strong green infrastructure network connecting to public rights of way makes it a more sustainable and visually appropriate location for development.

### **Ecology Technical Note**

#### Assessment of Ecology Findings on Land South of Halstead Road

- 4.13 The updated Ecology Technical Note prepared by Ethos Environmental Planning (January 2026) identifies that Land South of Halstead Road comprises primarily arable land of very low ecological value, with the principal ecological interest confined to boundary hedgerows and adjacent designated/priority habitats. The site contains no statutory designated sites and no on-site priority habitat other than boundary hedgerows, with earlier mapping of traditional orchard confirmed as historic and no longer present on the ground. The site is bordered by hedgerows and mature trees, which have potential to provide habitats for protected species such as bats, birds, and hedgehogs.

The adjacent Seven Star Green LWS, a species-rich acidic grassland site, is the primary ecological constraint.

- 4.14 The proposed development incorporates a buffer to protect Seven Star Green LWS. As part of the proposed development, there is a clear opportunity to contribute positively to the adjacent LWS through developer-funded management actions, including the removal and ongoing management of ash trees that are negatively impacting the rare grassland habitat, which is currently assessed as being in unfavourable and declining condition due to shading and encroachment from planted ash trees. The proposed development would also deliver substantial areas of accessible open space within the site, helping to accommodate recreational use away from the LWS and thereby reducing potential residential pressure.
- 4.15 In recognition of the potential for increased residential pressure on the LWS, we propose that the development could help finance the removal and ongoing management of ash trees within the site. In recognition of the potential for increased residential pressure on the LWS, the updated Technical Note envisages that the development could assist in financing habitat management measures at Seven Star Green, supported by a Construction Environmental Management Plan and long-term Habitat Management and Monitoring Plan. This would form part of a broader suite of ecological enhancement measures and provide a clear and tangible benefit to the site's overall condition and biodiversity value.
- 4.16 We believe this would represent a practical and deliverable management action, contributing directly to the restoration of priority habitats and helping to offset any indirect effects associated with the development. This commitment would demonstrate a proactive approach to biodiversity net gain and positive engagement with local conservation objectives.
- 4.17 These off-site actions would sit alongside on-site enhancements to hedgerows, orchard planting, species-rich grassland and SuDS features designed to function as ponds and wet habitats, all managed for biodiversity. Retention of boundary hedgerows outside of private gardens and their protection over the 30-year BNG period are key components of the strategy.
- 4.18 The updated surveys undertaken in Autumn 2025 conclude that dormice are likely absent from the site, reducing one key species constraint. Bat surveys recorded eleven bat species, including Annex II barbastelle, with highest activity along the north-west boundary adjacent to Seven Star Green, confirming the importance of retaining and sensitively managing boundary habitats and controlling external lighting. Further bat survey work in 2026, GCN eDNA testing of local ponds and a scoped breeding bird survey are proposed to refine mitigation and enhancement measures at application stage.

Assessment of Ecology Findings for Land North of Halstead Road (East of Wood Lane)

- 4.19 The site is constrained by its proximity to a tributary of the River Colne. Additionally, meeting the 10% BNG requirement (particularly in light of Land south of Halstead's ability to provide 20%) is problematic due to the need for river units, which are costly and difficult to secure. This of course raises serious concerns over the deliverability of this site if it is unable to meet its statutory BNG requirement. Potential ecological impacts on bats, badgers, dormice, and water voles further complicate development.

Assessment of Ecology Findings for Land North of Halstead Road (West of Fiddlers Wood)

- 4.20 This site is adjacent to ancient woodland and priority habitats, necessitating substantial buffer zones. The increased risk of habitat degradation due to residential pressure poses a significant ecological constraint. Similarly to the assessment for the Land North of Halstead Road site detailed above, potential residential impacts of development are likely on this site, due to the presence of a Public Right of Way which runs through Fiddlers Wood. Colchester City Council Emerging Allocations Biodiversity Assessment considers the development to have significant impact on the condition of Fiddlers Wood through increased residential disturbance, noise and lighting. It is likely to sustain significant adverse recreational impacts from residents, dog walkers and families who regularly use the existing PRoW and from new residents of the development. Due to the publicly accessible nature of the site, it is unlikely that these impacts could be sufficiently mitigated to an acceptable level that would retain the current condition of the woodland. The presence of protected species, including dormice and breeding birds, further limits the site's suitability for development.

Concluding Assessment on Land South of Halstead Road

- 4.21 The Ecology Technical Note outlines the anticipated baseline ecological conditions of the site, including habitats (and the BNG baseline) and the potential presence of protected species. It identifies constraints and opportunities for development, as well as further survey requirements. Several opportunities to strengthen, reinforce and enhance key landscape features and characteristics have been noted, such as the introduction of the recreational route to address SANG, supporting the B-Lines network targets, reducing recreational pressure on the adjacent LWS, and enhancing the LWS through developer-funded management actions. Development proposals are expected to yield 20% BNG for on-site habitat units, with hedgerow units capable of achieving 10% net gain.
- 4.22 Additionally, the constraints of the two other sites proposed by the Council as draft allocations have been examined. Identified impacts include risks to designated sites and priority habitats, recreational pressure, the need for adequate buffers for woodland habitats and BNG delivery.

## Heritage

### Assessment of Heritage Findings on Land South of Halstead Road

- 4.23 The Built Heritage Note identifies two nearby Grade II listed buildings: Malting House and Bakery Cottage. However, due to existing vegetation and the orientation of these buildings, there is no intervisibility with the site. The proposed development would not impact their setting, and mitigation measures, such as enhanced boundary planting, would further ensure no harm.

### Assessment of Heritage Findings for Land North of Halstead Road (East of Wood Lane)

- 4.24 This site is closer to historic features and has the ability to impact the setting of heritage assets. The potential impact on the historic rural character is more pronounced due to the site's openness and visibility.

### Assessment of Heritage Findings for Land North of Halstead Road (West of Fiddlers Wood)

- 4.25 Similarly, development in this location would result in the encroachment of built form into a historically rural landscape, leading to a harmful urbanising effect. The site's current agrarian and open nature contributes positively and distinctively to the rural character of the area and serves to reinforce the traditional countryside setting of nearby built form. This is particularly important in relation to the setting of designated heritage assets in the vicinity, which derive part of their significance from their relationship with the surrounding rural landscape. The introduction of development would erode this context, diminishing the legibility of the area's historic rural character and the contribution it makes to the significance of these assets.

### Concluding Assessment on Land South of Halstead Road

- 4.26 Land South of Halstead Road is a suitable site in heritage terms. It would not result in any significant impact upon designated heritage assets or their settings, whereas the competing sites introduce greater risk of harm to historic character and setting. The existing landscape framework ensures that development can be integrated without adverse effects on heritage assets.

## Transport Technical Note

### Assessment of Transport Findings on Land South of Halstead Road

- 4.27 The Transport Technical Note, prepared by Lime Transport, assesses the transport implications of the proposed development of approximately 125 homes at Land South of Halstead Road, Eight Ash Green. The site is well positioned in terms of accessibility, located adjacent to Halstead Road with

existing pedestrian footways and bus services providing links to Colchester and beyond. The site is within a 2-minute drive of the A12 Junction 26, offering excellent connectivity to major employment and service centres, including Ipswich, Chelmsford, and Braintree.

- 4.28 Vehicular access to the site is proposed via a simple priority junction onto Halstead Road, designed in accordance with the Essex Design Guide. Visibility splays are achievable, and the 30mph speed limit on Halstead Road ensures safe ingress and egress. Additionally, pedestrian links will be provided to Public Right of Way 16, located along the southern boundary of the site, further enhancing non-vehicular connectivity.
- 4.29 The sustainability assessment identifies the village of Eight Ash Green as a 'Sustainable Settlement' with key facilities such as a convenience store, primary school, petrol station, and healthcare services located within walking and cycling distance. Public transport provision includes frequent bus services, while National Cycle Route 13 is accessible approximately 850m to the north. The site benefits from existing pedestrian crossings along Halstead Road, though opportunities for further enhancements, such as upgrading informal crossings to zebra crossings, are identified as potential improvements.
- 4.30 The overall conclusion is that the site has strong transport credentials and offers good access to sustainable transport options, making it a viable and well-located site for residential development.

#### Assessment of Transport Findings for Land North of Halstead Road (East of Wood Lane)

- 4.31 The site north of Halstead Road, east of Wood Lane, is proposed as an allocation for 180 homes. Similarly to Land South of Halstead Road, it requires residents to cross Halstead Road to access some key facilities such as the petrol filling station and convenience store and is therefore just as sustainable in this regard.
- 4.32 Access constraints are noted, particularly with regard to ensuring safe and suitable pedestrian links. The Strategic Land Availability Assessment identified minor positive transport effects. However, it also noted that mitigation measures would be required to improve pedestrian accessibility and bus stop access. It has not been sufficiently justified as to why the Land South of Halstead Road was scored more negatively in terms of its transport effects, when both sites require residents to cross at Halstead Road.

#### Assessment of Transport Findings for Land North of Halstead Road (West of Fiddlers Wood)

- 4.33 The site to the west of Fiddlers Wood is proposed as an allocation for 250 homes but is identified within the Transport Technical Note as having greater transport constraints compared to the other two sites. It is further removed from key village amenities and has a 'very low' accessibility rating in

Essex's Parking Standards assessment. The site is approximately 900m from the nearest bus stop, exceeding the recommended walking distance, which would necessitate additional infrastructure investment to improve access to public transport.

- 4.34 The absence of a continuous footway network and the increased travel distances to key facilities make this site less sustainable in transport terms. Additionally, its location relative to the strategic road network and existing cycle infrastructure reduces its potential for achieving significant modal shift away from car dependency.

#### Preapplication Engagement with Essex County Council and National Highways

- 4.35 Essex Highways and National Highways have been proactively engaged as part of the comprehensive pre-application process for the proposed development at Land South of Halstead Road, Eight Ash Green. Lime Transport prepared a detailed Scoping Note and facilitated a productive joint meeting with both authorities on 20th November 2025, yielding constructive feedback that has shaped the emerging transport strategy.
- 4.36 Essex Highways confirmed applicability of the 2009 Essex Parking Standards, endorsed the proposed Transport Assessment (TA) methodology, and outlined additional supporting documents required for a full planning application, including a Travel Plan and Road Safety Audit Stage 1. Layout refinements were advised, notably repositioning the verge and footway along the principal street to ensure the footway abuts the carriageway for adoptability. Agreed mitigation measures include a new pedestrian crossing on Halstead Road, comprehensive footway provision fronting the site, and enhancements to nearby bus stops to promote sustainable travel modes.
- 4.37 National Highways similarly approved the TA methodology, agreeing that A12 Junction 26 warrants surveying with potential for targeted further analysis, while noting inherent constraints on major improvements at this location. They specified supplementary reports, comprising an exemption justification for the walking, cycling, and horse-riding assessment at the junction, alongside a dedicated safety risk assessment section within the TA, ensuring robust consideration of strategic highway implications.

#### Concluding Assessment on Land South of Halstead Road

- 4.38 The Transport Technical Note concludes that Land South of Halstead Road is more sustainable than the site to the west, and just as sustainable to the site immediately to the north. It benefits from direct access to the existing settlement, a well-developed pedestrian and cycle network, and frequent public transport connections. While there is a need to improve pedestrian crossing facilities, these are minor interventions compared to the significant accessibility challenges faced by

the site to the west of Fiddlers Wood. The proximity to the A12 also provides a strong advantage in terms of regional connectivity.

- 4.39 Overall, Land South of Halstead Road is the preferred site for residential development based on transport considerations, with opportunities for enhancement through targeted infrastructure improvements.

## 5. EIGHT ASH GREEN NEIGHBOURHOOD PLAN (2019)

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- 5.1 The Eight Ash Green Neighbourhood Plan (made December 2019) establishes a vision for sustainable development that maintains the village's distinct rural character while ensuring future growth meets local needs. The Plan strongly emphasises preserving open countryside, reinforcing the village's separation from neighbouring settlements, and delivering high-quality, carefully planned development that integrates into the existing built environment. While the Neighbourhood Plan originally envisaged growth being limited to 150 homes at Fiddlers Field, this allocation has now been fully consented and/or built out, meaning any further housing growth must be carefully considered in light of the Plan's overarching objectives.
- 5.2 Land south of Halstead Road offers an opportunity to deliver a sensitive and sympathetic scheme that aligns with the aspirations and policies of the Neighbourhood Plan, ensuring development remains well-contained and contributes positively to the local landscape, infrastructure, and community facilities.

### **Development Approach**

- 5.3 The Neighbourhood Plan allocated 150 new dwellings at Fiddlers Field to provide for the village's housing needs up to 2033, and this has now been fully consented and/or built out. However, Eight Ash Green remains a sustainable and attractive settlement, and new housing must continue to be carefully directed to the most suitable and least impactful locations.
- 5.4 Land south of Halstead Road represents an opportunity to deliver a modest, well-contained development that respects the village's rural character while integrating into the existing built environment. This location benefits from strong physical and visual screening, ensuring that any development remains sympathetic to the landscape setting, avoiding the risk of urban sprawl. Unlike alternative locations that could lead to coalescence with Colchester or an erosion of the settlement pattern, development at Land south of Halstead Road would reinforce the village's structure, preventing unnecessary westward expansion beyond Fiddlers Wood and safeguarding the distinct separation between two distinctive parts of Eight Ash Green.
- 5.5 The site also offers a well-planned approach to connectivity, enabling improved integration between the northern and southern areas of the village. Through the provision of traffic calming measures and new pedestrian crossings, development at Land south of Halstead Road can enhance

pedestrian and cycle linkages, making movement within the village safer and more cohesive. This aligns with the Neighbourhood Plan's objective to improve non-car-based travel while reducing vehicle speeds along Halstead Road.

### **Environmental and Landscape Protection**

- 5.6 The Neighbourhood Plan places a strong emphasis on preserving the rural and ecological character of Eight Ash Green, ensuring that development contributes positively to the village's environmental assets. Land south of Halstead Road is well-contained within the existing landscape, benefiting from natural screening and defensible boundaries, minimising any visual impact. Development at this location can be designed to enhance biodiversity by strengthening existing green infrastructure, incorporating native tree planting, habitat creation, and sustainable drainage features.
- 5.7 Importantly, this site provides an opportunity to positively contribute to the Seven Star Green Local Wildlife Site, aligning with the Neighbourhood Plan's commitment to safeguarding and enhancing key green spaces. Through careful masterplanning, development at Land south of Halstead Road can deliver ecological enhancements, such as extended habitat areas, enhanced wildlife corridors, and around 20% on-site biodiversity net gain. This ensures that new housing not only avoids harm to key environmental assets but actively improves them, delivering a net benefit for local wildlife and green infrastructure.

### **Infrastructure and Connectivity**

- 5.8 A key objective of the Neighbourhood Plan is ensuring that development is supported by appropriate infrastructure improvements, particularly in relation to transport, community amenities, and drainage. Land south of Halstead Road presents a sustainable opportunity to help deliver critical infrastructure, providing both financial contributions and direct provision to benefit the wider community.
- 5.9 One of the Plan's aspirations is the creation of a new community hub designated on the site of the Church of England Church, as governed by Policy CS 1 and identified on the Policies Map (page 67) and the identification of this facility to the south of Halstead Road clearly acknowledges that this location is suitable and sustainable for both existing and future residents of Eight Ash Green. Indeed, the Parish Council acknowledge at page 63 in the rationale for Policy CS 1 that the Church site is ideally located within the centre of the village:

*“The proposed site is located in the centre of the village, has good access, there is plenty of land for parking and room to build a new, bigger hub/community hall which will be able to host larger audiences and provide more modern facilities such as film showings, dance hall, indoor badminton court, gymnasium equipment etc.” (Our emphasis)*

- 5.10 As Land south of Halstead Road immediately adjoins the identified community hub site on the Church land, it follows that by the Parish’s definition of the centre of the village with good access that the same should apply to this site also. As such Land south of Halstead Road is regarded as a central location within the village.
- 5.11 Development at Land south of Halstead Road can actively support the delivery of this much-needed facility, either through financial contributions, infrastructure provision, or access improvements. This aligns with the Plan’s broader aim of ensuring that growth delivers tangible benefits for local residents, enhancing the social and recreational offer within the village.
- 5.12 In addition, the integration of new pedestrian and cycle routes alongside carefully designed traffic calming measures will improve connectivity across Halstead Road, better linking the northern and southern areas of the village. This aligns with the Neighbourhood Plan’s objectives to enhance sustainable transport options and ensure that new development contributes to a more walkable and cohesive village environment.
- 5.13 Furthermore, the Plan emphasises the need for sustainable drainage solutions (SuDS) to mitigate flood risk and manage surface water effectively. Development at Land south of Halstead Road presents an opportunity to deliver high-quality SuDS features, helping to manage runoff while also enhancing biodiversity and landscape quality.

### **Community & Amenities**

- 5.14 The Neighbourhood Plan highlights the importance of enhancing local facilities, ensuring that growth delivers clear benefits for the community. One of the key priorities is the delivery of a new community hub, and Land south of Halstead Road is uniquely positioned to support this aspiration, helping to provide the necessary land, funding, or access to bring this facility forward. This directly supports the Plan’s commitment to enhancing local services and ensures that new development contributes positively to the social infrastructure of the village.
- 5.15 In addition, the Plan seeks to protect and enhance local green spaces, reinforcing the importance of sites such as Seven Star Green. Development at Land south of Halstead Road can help enhance

and contribute to this key local asset, ensuring that it continues to serve as a valuable recreational and ecological resource for the community.

### **Parish Council Engagement**

- 5.16 Eight Ash Green Parish Council have publicly objected to Sites 10656 (PP31) and 10090 (PP32). The Parish Council undertook a public consultation on the 10<sup>th</sup> and 11<sup>th</sup> January 2026, inviting Eight Ash Green residents to provide views on the proposed allocations, as well as alternative sites that came forward at the call for sites stage but were not put forward as draft allocations, including Site 10760 (Land South of Halstead Road).
- 5.17 The Parish Council are considering the Site as an alternative to Sites 10656 (PP31) and 10090 (PP32), which are located north of Halstead Road. This further reinforces the Site's location as superior for residential allocation within the Preferred Options Draft Local Plan (PODLP), compared to the two sites that have been proposed as allocations north of Halstead Road.
- 5.18 Cala Homes are engaging with the Parish Council to work collaboratively with regards to the Site South of Halstead Road.

### **Conclusion**

- 5.19 While the Neighbourhood Plan (made on December 2019, and is now therefore out of date) originally envisaged growth being limited to 150 homes at Fiddlers Field, this allocation has now been fully consented and/or built out, meaning the village must now consider where future development can be best directed. Land south of Halstead Road presents a sustainable, well-contained opportunity that aligns with the Plan's objectives, ensuring that any additional housing is sensitively integrated, environmentally responsible, and directly beneficial to the wider community.
- 5.20 By supporting the delivery of the new community hub, contributing to green infrastructure and local wildlife sites, enhancing pedestrian connectivity, and preventing unnecessary westward expansion, development at Land south of Halstead Road offers a logical and policy-aligned extension to Eight Ash Green, delivering long-term benefits for both new and existing residents.

## 6. STRATEGIC LAND AVAILABILITY ASSESSMENT (SLAA)

6.1 The following section (and table below) reviews the scoring of the Site alongside the two draft residential allocations that have been proposed for Eight Ash Green in the PODLP.

Criteria	Land north of Halstead Road, east of Wood Lane (ID 10656)	Land to north of Halstead Road, west of Fiddlers Wood (ID 10090)	Land south of Halstead Road (ID 10760)
Site Area (ha)	7.01	9.83	6.11
Proposed Use(s)	Housing	Housing, Commercial, Infrastructure, Green Infrastructure	Housing, Green Infrastructure
Within/adjacent to settlement boundary?	Amber – Adjacent or close proximity	Amber – Adjacent or close proximity	Amber – Adjacent or close proximity
Coalescence risk	Green – No contribution	Green – No contribution	Green – No contribution
Access & Highway Constraints	Amber – Some constraints but not significant	Green – No constraints	Amber – Some constraints but not significant
Utilities Provision Issues	Green – No known issues	Green – No known issues	Green – No known issues
Site Constraints (topography, pylons, etc.)	Green – No known constraints	Green – No known constraints	Green – No known constraints
Greenfield/Brownfield	Red – Greenfield (75%+)	Red – Greenfield (75%+)	Red – Greenfield (75%+)
Agricultural Land Classification	Red – Grade 1, 2, or 3a (50% or more)	Red – Grade 1, 2, or 3a (50% or more)	Red – Grade 1, 2, or 3a (50% or more)
Neighbouring Uses Impact	Green – No impact	Green – No impact	Green – No impact
Designations (AONB, SSSI, etc.)	Green – None	Green – None	Green – None
Local Designations (LoWS, LNR, etc.)	Green – None	Green – None	Green – None
Potential for Green Infrastructure	Green – Opportunity to enhance/create	Amber – Some potential	Green – Opportunity to enhance/create

Archaeology/Heritage Impact	Green – No harm	Green – No harm	Amber – Possible harm
Loss of Public Open Space/PROW?	Green – No loss	Amber – Partial loss	Green – No loss
Flood Risk Zone	Green – Flood Zone 1	Green – Flood Zone 1	Green – Flood Zone 1
Within Critical Drainage Area?	Green – No	Green – No	Green – No
Submitted for Local Plan Review?	Green – Yes	Green – Yes	Green – Yes
Ownership Situation	Amber – Multiple owners	Green – Single owner	Amber – Multiple owners
Willingness for Comprehensive Approach	Green – Yes	Green – Yes	Green – Yes
Current Use & Development Potential	Green – Vacant/can cease use at short notice	Green – Vacant/can cease use at short notice	Green – Vacant/can cease use at short notice
History of Unimplemented Permissions?	Green – No	Green – No	Green – No
Economic Viability	Green – Likely viable	Green – Likely viable	Green – Likely viable
Reliance on Other Land?	Green – No	Green – No	Green – No
Minerals Safeguarding Area?	Green – No	Red – Yes, could sterilise mineral resources	Green – No
Protected for Alternative Use?	Green – No	Green – No	Green – No
Contamination Issues?	Amber – Possible but remediable	Amber – Possible but remediable	Amber – Possible but remediable

6.2 The three sites under consideration exhibit both notable similarities and key distinctions across a range of technical assessment criteria. While all three are broadly suitable for development, their comparative strengths and weaknesses will influence their planning prospects.

6.3 All three sites share several key attributes. Each is located adjacent to or in close proximity to an existing settlement boundary, making them logical candidates for future development in terms of connectivity and accessibility. None of the sites contribute to settlement coalescence, however it is evident that site 10656 (PP31) partially erodes the green buffer of arable farmland between the village cluster centred around Spring Lane to the east, and Wood Lane to the west. Furthermore,

site 10090 (PP32) arguably leads to continued, unchecked sprawl to the west of the core settlement. This is supported by the robust conclusions in Section 3 of this representation.

- 6.4 None of the sites are located within nationally or locally designated areas of environmental sensitivity such as Areas of Outstanding Natural Beauty (AONBs), Sites of Special Scientific Interest (SSSIs), or Local Wildlife Sites, which means that their development would not inherently conflict with major ecological or landscape protections. However, site 10090 (PP32) abuts an Ancient Woodland, requiring mitigation which may burden deliverability of future development. As well as having the potential to have greater ecological / environmental impact given its proximity to the ancient woodland.
- 6.5 Notwithstanding the absence of statutory landscape or ecological designations, national planning policy is clear that Ancient Woodland is an irreplaceable habitat and should be afforded a level of protection equivalent to the highest environmental constraints. The proximity of Site 10090 (PP32) to Ancient Woodland therefore represents a fundamental site-specific limitation rather than a matter of detail capable of resolution through design alone. The requirement for substantial buffers, avoidance measures, and long-term management regimes is likely to reduce the effective developable area and introduce ongoing uncertainty as to layout efficiency and viability. This is evident by the consultee objections to the outline application on Site 10090 (PP32). The persistence of Woodland Trust objections, notwithstanding amendments and further technical submissions, is a clear indication that the harm is inherent to the site, not a matter of scheme design. Yet this reality is not reflected in the scoring or narrative justification for allocation.
- 6.6 In addition to ancient woodland impacts, Site 10090 (PP32) is subject to sustained objection from Place Services on landscape grounds. These objections demonstrate that the site occupies a visually exposed position on the Great Tey Farmland Plateau, contributing to long-distance views across the Colne Valley and reinforcing the rural setting of Eight Ash Green.
- 6.7 These considerations materially distinguish Site 10090 (PP32) from Site 10760, which is not subject to any comparable ecological constraints and can be brought forward without reliance on extensive mitigation to avoid harm to irreplaceable assets.
- 6.8 In terms of development feasibility, all three sites present viable opportunities. There are no fundamental site constraints related to topography, pylons, or utility provision, and while potential contamination has been identified across all sites, it is considered remediable without affecting the overall viability of development. Additionally, each site is wholly located within Flood Zone 1 and is not within a Critical Drainage Area, meaning that flood risk is not a major impediment to delivery. The sites have also all been submitted through the Call for Sites process for the Local Plan Review, reflecting landowner interest in bringing them forward for development.

- 6.9 Despite these overarching similarities, there are distinct differences that set the sites apart. One of the most significant contrasts lies in access and highway constraints. Site 10090 (PP32) has been assessed as having "no reasonable constraints," whereas both 10656 (PP31) and 10760 are identified as having some highway constraints. While these constraints are not deemed severe enough to preclude development, the Council consider that they could present challenges in terms of access improvements or mitigation requirements.
- 6.10 It is not entirely clear how the SLAA has arrived at this conclusion, particularly given the conclusions on sustainability in terms of poor accessibility discussed in Section 3 of this representation.
- 6.11 The potential for green infrastructure enhancement also varies between the sites. Both the Site and site 10656 (PP31) have been identified as offering clear opportunities to create or enhance green infrastructure, such as open space, parks, or recreation grounds. By contrast, the site 10090 (PP32) is assessed more cautiously, with only a possibility of such opportunities. This suggests that while all three could contribute positively to public realm improvements, site 10090 (PP32) may require additional intervention to ensure meaningful green infrastructure delivery. This is again a potential flaw in selecting a site that will require extensive buffers to offset any potential impact on the Ancient Woodland.
- 6.12 Heritage and public open space considerations introduce further differences. The Site is the only one identified as potentially causing harm to archaeological or heritage assets, which could necessitate further assessments and mitigation measures. As per the supporting Built Heritage Technical Note, there is nothing to suggest that development on the Site would potentially cause harm to archaeological or heritage assets, especially when compared with the other two sites.
- 6.13 Meanwhile, development on site 10090 (PP32) would result in the partial loss of public open space or public rights of way. With no need to extinguish or relocate existing public rights of way, selection of site 10090 (PP32) for residential allocation, compared to the Land South of Halstead Road, would be more involved and cumbersome in terms of re-provision of public infrastructure compared to seamlessly integrating into it, as would be the case for Land south of Halstead.
- 6.14 A critical distinction affecting the 10090 (PP32) is its designation within a Minerals Safeguarding Area. Unlike the other two sites, it is wholly within this designation, meaning that its development for non-mineral uses could sterilise mineral resources. This presents a potential policy conflict that requires additional justification and mitigation measures to ensure compliance with minerals planning policies. This again exemplifies the additional burdens on future development site constraints such as these will have on the viability and deliverability of site 10090 (PP32).

6.15 Overall, while all three sites are broadly suitable for development, we would challenge some of the conclusions on the scoring as well as bring attention to the constraints and disadvantages of sites 10090 (PP32) and 10656 (PP31) compared to the Site and why the Site should be considered more suitable for residential development.

## 7. SUSTAINABILITY APPRAISAL

7.1 The Sustainability Appraisal (SA) evaluates the social, economic, and environmental impact of all suitable sites, proposed spatial options and reasonable alternatives. This section of discussion seeks to comment solely on the appraisal of the Site (reference 10760), Land north of Halstead Road and east of Wood Lane (reference 10656) and Land north of Halstead Road and west of Fiddlers Wood (reference 10090).

7.2 The table (with supporting Key) below shows the comparison between the three sites.

Sustainability Objective	Site 10760	Site 10656	Site 10090
Housing (SA1)	++	++	++
Land Efficiency (SA2)	--	--	--
Economic Growth (SA3)	-	-	-
Transport (SA4)	-	+	-
Community & Wellbeing (SA5)	+	+	+
Services & Facilities (SA6)	-	-	-
Historic Environment (SA7)	--?	--?	-?
Biodiversity (SA8)	--	--	-
Landscape (SA9)	-?	-?	-?
Climate Change (SA10)	N/A	N/A	N/A
Flood Risk (SA11)	0	0	0
Waste (SA12)	N/A	N/A	N/A
Air Quality (SA13)	-	-	-
Water Resources (SA14)	-	-	-

Significant Positive Effects	++
Positive Effects	+
Minor Effects	-
Uncertain Significant Negative Effects	--?
Significant Negative Effects	--

Uncertain Minor Effects	-?
Not Applicable	N/A
Nil Effect	0

- 7.3 The SA aims to evaluate the environmental, social, and economic effects of different site allocations. However, the scoring of the three assessed sites—10760 (Land South of Halstead Road), 10656 (PP31) (Land north of Halstead Road, east of Wood Lane), and 10090 (PP32) (Land north of Halstead Road, west of Fiddlers Wood)—does not accurately reflect the comparative merits of each location. The only elements that distinguish Site 10090 (PP32) in the SA are its minor or potential minor adverse impacts against Historic Environment (SA7), Biodiversity (SA8), and Landscape (SA9), yet the technical evidence provided in Section 3 contradicts this assessment. Similarly, Site 10656 (PP31) is scored more positively for Transport (SA4), despite clear evidence within the Transport Technical Note that demonstrates otherwise.
- 7.4 This level of exposure is a direct consequence of the site’s elevated and open landscape context, rather than the absence of design mitigation at this stage. As such, the scale of landscape harm associated with Site 10090 (PP32) is inherent to the site itself and would persist irrespective of future masterplanning or planting proposals. The extent of visual intrusion, particularly when viewed from surrounding public rights of way and the wider countryside, indicates that development would result in a pronounced and irreversible change in character. In contrast, Site 10760 benefits from a more contained and defensible landscape setting, where development can be integrated in a manner that respects existing settlement form and limits the perception of urban encroachment..
- 7.5 In contrast, Site 10760 benefits from strong boundary vegetation that provides a natural screen, ensuring that development integrates into the landscape more effectively. The LVIA identifies that Site 10090 (PP32) would require substantial mitigation, including extensive tree planting and green buffers, which are not inherent site characteristics but rather burdens on viability and deliverability. Given this, Site 10760 should have received a more favourable landscape score (SA9) than Site 10090.
- 7.6 In terms of biodiversity (SA8), the Ecology Technical Note in Section 3 highlights that Site 10090 (PP32) is adjacent to Ancient Woodland and requires significant buffer zones to mitigate ecological harm. The presence of protected species and priority habitats places additional constraints on development. Site 10760, on the other hand, can deliver around 20% Biodiversity Net Gain (BNG) on-site without the need for extensive mitigation, an achievement that Site 10090 (PP32) is unlikely to match given its ecological constraints. On this basis, it is considered that SA should have reflected

the fact that Site 10090 (PP32) presents a higher risk of ecological harm and a lower likelihood of achieving meaningful biodiversity enhancements compared to Site 10760. In this context, the Sustainability Appraisal does not appear to have applied sufficient differentiation between sites that merely require ecological enhancement and those, such as Site 10090 (PP32), where development must first avoid and mitigate harm to irreplaceable habitats before any net gain can be contemplated. The need to prioritise avoidance and buffering around Ancient Woodland significantly constrains the scope for meaningful on-site biodiversity enhancements and increases the risk that biodiversity outcomes will be marginal or displaced off-site. By contrast, the ability of Site 10760 to deliver substantial on-site Biodiversity Net Gain reflects its comparatively unconstrained ecological baseline. This distinction is material and should have been more clearly reflected in the appraisal of reasonable alternatives, particularly given the emphasis in national policy on minimising harm before relying on mitigation or compensation.

- 7.7 Regarding the Historic Environment (SA7), the Built Heritage Note referred to in Section 3 clarifies that Site 10090's (PP32) proximity to sensitive heritage assets poses a greater risk of impact than suggested by the SA scoring. Unlike Site 10760, which has no intervisibility with nearby heritage assets, Site 10090 (PP32) is closer to historic features and requires mitigation to minimise harm to their setting. The SA's assertion that Site 10090 (PP32) presents only a minor or potential minor adverse impact on the historic environment is therefore misleading. Site 10760, with its lack of direct impact on heritage assets, should be scored at least equally if not more favourably than Site 10090 (PP32).
- 7.8 The SA also distinguishes Site 10656 (PP31) as performing better in Transport (SA4), but the Transport Technical Note provides clear evidence to the contrary. While Site 10656 (PP31) benefits from proximity to bus stops, it is not significantly better connected than Site 10760. Site 10760 is adjacent to Halstead Road, with existing pedestrian infrastructure and frequent bus services linking to Colchester and surrounding areas. The proximity of Site 10760 to the A12 further enhances its strategic connectivity, making it an efficient location for development. In contrast, Site 10090 (PP32) faces greater accessibility constraints, requiring additional infrastructure investment to improve pedestrian and transport links. The SA does not account for these disparities accurately, and the transport scoring should be revisited to reflect the stronger credentials of Site 10760.
- 7.9 The Colchester Infrastructure Audit and Development Plan (October 2025) sets out the active travel routes that are key to the Local Plan's growth mitigation package. In addition, it identifies the need for a network of mobility hubs across Colchester. This includes the following:
- Eight Ash Green mobility hub – cost £506,880 with funding not secured and anticipated that 25% will be secured from preferred allocations and 25% from reference case developments.

- Walking route from Eight Ash Green to Stanway (connecting to the new Rapid Transit System) – cost £1,536,000 with funding not secured and 50% will be secured from preferred allocations.

7.10 The Further Transport Evidence (October 2025) expands on initial transport evidence published in February 2025. This evidence found that the A12 Junction 26 operates over-capacity and considers that the junction experiences peak hour queueing. Development in the area will add pressure to the network and measures are likely required to help mitigate this impact.

7.11 In summary, the SA does not robustly assess the comparative sustainability of these three sites. The scoring fails to reflect the evidence presented in Section 3, particularly regarding landscape, biodiversity, heritage, and transport. A reassessment of these categories should result in a more accurate representation, reinforcing the case that Site 10760 is at least equal to, if not superior to, Site 10090 (PP32) and Site 10656 (PP31) in sustainability terms. The evidence clearly supports the allocation of Site 10760 as a more appropriate and sustainable development location within the Local Plan.

## 8. SUMMARY

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- 8.1 Land South of Halstead Road, Eight Ash Green, presents a demonstrably superior site for residential allocation within the Preferred Options Draft Local Plan (PODLP) compared to the two sites that have been proposed as allocations. Despite being assessed as suitable, available, and achievable, the Site has been overlooked in favour of two more constrained sites, with the site to the west of the settlement being far less sustainable. A thorough technical review of landscape, ecology, transport, and heritage assessments unequivocally supports the allocation of this Site. The absence of a transparent, evidence-based rationale for its exclusion raises significant concerns regarding the robustness of the site selection process.
- 8.2 Eight Ash Green is a sustainable settlement, well-equipped with the necessary infrastructure and services to support additional housing growth. The village benefits from a range of amenities, including a primary school, healthcare facilities, a convenience store, a well-connected public transport network, and in close proximity to Colchester. These factors position Eight Ash Green as an ideal location for sustainable development. Given the pressing national and local housing need, the Local Plan should incorporate a buffer to ensure flexibility in housing delivery. However, the evidence base does not clearly demonstrate how settlement capacity has been assessed, nor does it provide a justification for restricting additional growth in this location. The Site should be draft allocated to align with national policy directives that emphasise a proactive and ambitious approach to addressing housing shortages.
- 8.3 From a landscape perspective, the Site is highly advantageous. It is enclosed by strong boundary vegetation that significantly reduces visual impact, allowing it to integrate seamlessly into the existing settlement pattern without encroaching upon open countryside. In contrast, the allocated sites 10656 (PP31) and 10090 (PP32) lack sufficient structural vegetation and are far more visually exposed. These sites would require extensive and potentially unachievable mitigation measures to limit their landscape impact. Their development would also disrupt the natural settlement pattern and contribute to unnecessary urban sprawl, eroding the clear buffer zones that define Eight Ash Green's rural character, going against the aspirations of the Neighbourhood Plan.
- 8.4 The ecological credentials of the site further reinforce its suitability. It is demonstrably capable of delivering a 20% biodiversity net gain (BNG) on-site, supported by a robust metric. Unlike Site 10656 (PP31), which will require very rare and expensive riparian units that may not be available at the time of development, Land South of Halstead Road avoids these viability constraints. Furthermore, it does not encroach upon Ancient Woodland, unlike Site 10090 (PP32), which necessitates significant

buffer zones and mitigation efforts that could limit housing numbers and ultimately burden the deliverability of the site. This demonstrates that, in ecological terms, Land South of Halstead Road presents a far more sustainable development opportunity.

- 8.5 The site also performs favourably in heritage assessments. While two nearby Grade II listed buildings exist (Malting House and Bakery Cottage), they are well separated from the site by mature vegetation, ensuring no intervisibility. The proposed development would not adversely affect their setting, and the opportunity exists to further enhance boundary planting as a mitigation measure. Conversely, both allocated sites pose a much greater risk to the historic rural character of the area and will require extensive further assessment and mitigation, adding uncertainty to their viability.
- 8.6 Transport and connectivity further underscore the advantages of Land South of Halstead Road. The site benefits from immediate access to Halstead Road, which already has pedestrian footways and frequent bus services linking to Colchester and surrounding settlements. Its proximity to the A12 also ensures strong regional connectivity to major employment and service centres. In stark contrast, Site 10090 (PP32) suffers from clear accessibility limitations, requiring additional infrastructure investment to provide even a basic level of connectivity. While minor pedestrian crossing improvements may be needed for Land South of Halstead Road, these pale in comparison to the substantial transport challenges faced by the alternative allocations.
- 8.7 The allocation of this site would also align seamlessly with the objectives of the Eight Ash Green Neighbourhood Plan, particularly in supporting the delivery of a new community hub. Its central location ensures accessibility for both existing and future residents while avoiding excessive westward expansion, which would otherwise erode the settlement's defined buffer zones. Development at Land South of Halstead Road would reinforce the settlement's structure and cohesion, preventing the dispersed and disconnected sprawl that would result from the currently proposed allocations.
- 8.8 A fundamental flaw of the Strategic Land Availability Assessment (SLAA) and Sustainability Appraisal (SA) is the lack of a robust justification for the exclusion of this site. The SLAA highlights that Site 10090 (PP32) is burdened by several constraints, including its designation within a Minerals Safeguarding Area, which could significantly hinder development. Additionally, the SA identifies Site 10656 (PP31) as having major biodiversity constraints due to the presence of Priority Habitat woodland, making it the least sustainable of the three sites. Despite these clear disadvantages, the PODLP has proposed allocating these constrained sites while disregarding a demonstrably superior alternative.
- 8.9 In summary, Land South of Halstead Road offers a more sustainable, deliverable, and well-integrated development opportunity than the two draft allocated sites. Its strong landscape containment,

ecological potential, alignment with local planning objectives, and superior accessibility make it the logical choice for residential allocation. The Local Plan must reconsider its approach and allocate this site to ensure a more robust, justified, and sustainable development strategy that aligns with both local and national planning objectives.