

ECC RESPONSE TO THE COLCHESTER LOCAL PLAN – REGULATION 18 (PREFERRED OPTIONS LOCAL PLAN), NOVEMBER 2025

ECC response dated 14th January 2026

INTRODUCTION

Essex County Council (ECC) strongly supports the preparation of a new Local Plan for Colchester City Council (CCC). A Local Plan by setting out a vision and policies for the long-term planning and development of the borough should provide a platform from which to secure a sustainable economic, social and environmental future to the benefit of its residents, businesses and visitors. A robust long-term strategy will provide a reliable basis on which ECC (and any future local government authority given Local Government Reform) and its partners may plan future service provision and required infrastructure for which they are responsible. ECC will also use its best endeavours to assist CCC on strategic and cross-boundary matters under the duty to cooperate (or any replacement process), including engagement and co-operation with other organisations for which those issues may have relevance.

Everyone's Essex, ECCs organisation strategy, sets out four strategic areas and 20 commitments. One strategic aim seeks a strong, inclusive and sustainable economy. This strategic aim includes a commitment to deliver and maintain high quality infrastructure to support a growing economy and the delivery of new homes and communities. Achieving this requires us to ensure that the development, planning and infrastructure delivery across the administrative county, can be aligned and support the Local Plans that are being prepared across the county, at its boundaries and beyond. This is to ensure that the planned growth includes provision for the delivery of ECC's infrastructure and services commensurate with the growth being planned, and to support existing and future residents and businesses.

The Government expects every local planning authority (LPA) to rapidly create a clear, ambitious local plan for high quality housebuilding and economic growth. A local plan contains policies to guide development by identifying a spatial strategy, site allocations for employment and housing development and supporting infrastructure. It also seeks to protect the environment, land, and buildings for certain uses to ensure delivery of sustainable communities.

Plan-led development is very important for ECC and the Essex economy. It enables us to ensure infrastructure is provided in the right places at the right time and provides much needed market certainty for investors and business. It also clarifies where new development should be located but equally important it identifies areas where development should not be located. Local Plans provide the policy basis for us to properly address and mitigate the impact of development and ensure our corporate objectives have a basis in local planning policies. Unplanned development is a poor substitute where a council does not have a Local Plan, it is

far more expensive for the public purse, is generally of a much poorer quality and certainly is a major cause of concern to local people.

Changes to the National Planning Policy Framework (NPPF) in 2024 and the Government's on-going planning reform agenda, retain the pivotal role of local plans in guiding and supporting the delivery of growth across the country, together with emphasising the need to maintain effective cooperation between LPAs and county councils through the Duty to Cooperate (further detail on this matter is provided in this response). The ambitious 'housing targets' set by the Government are now mandatory with the challenge set to local authorities to help deliver these through local plan-making.

The Planning and Infrastructure Act 2025 (PIA) requires upper tier local authorities which in Greater Essex means ECC, together with Southend and Thurrock Unitary Councils to produce a Spatial Development Strategy (SDS) which set out the scale and broad locations for growth over a longer timeframe (20-30 years). When preparing the SDS, which is the spatial investment framework for Essex, it is important to recognise the existing growth planned in emerging Local Plans. It is anticipated the SDS will formally commence preparation later in 2026 once Regulations to support the PIA have been approved. Having considered the growth strategy and importance of the new Colchester Local Plan it is considered the work prepared by CCC in reviewing their adopted Local Plan is consistent with Government's strategic planning SDS objectives.

ECC will contribute cooperatively to the preparation of a new Colchester Local Plan, particularly within the following broad subject areas,

- ECC assets and services. Where relevant, advice on current status of assets and services and the likely impact and implications of proposals in emerging Local Plans for the future operation and delivery of ECC services (or any future local government authority).
- Evidence base. Guidance with assembly and interpretation of the evidence base both for strategic/cross-boundary projects, for example, education provision and transport studies and modelling.
- Sub-regional and broader context. Assistance with identification of relevant information and its fit with broader strategic initiatives; and assessments of how emerging proposals for the city may impact on areas beyond and vice-versa.
- Policy development. Contributions on the relationship of the evidence base to structure and content of emerging policies and proposals.
- Inter-relationship between Local Plans. Including the Essex Minerals Local Plan and Essex and Southend-on-Sea Waste Local Plan.

It is important that ECC continues to work closely with CCC so that local plan preparation can progress to the Regulation 19 stage and then through examination under the current plan-making system, where local plans need to be submitted for examination by December 2026, otherwise new procedures will apply. It is expected that CCC will continue to engage ECC, and that new and updated evidence from CCC will continue to be reviewed in relation to strategic

and cross boundary matters such as transportation, education, minerals and waste, flood and water management, climate change and net zero carbon, specialist and supported housing, green and blue infrastructure, and economic needs to inform the Regulation 19 Pre-Submission Plan.

The ECC response to the Colchester Local Plan – Regulation 18 (Preferred Options Local Plan) (the Draft Plan) takes into account the need to plan for sustainable and climate resilient forms of development and to ensure the infrastructure requirements sought are adequately provided for. Such requirements need to support the spatial patterns of growth and cannot place an unaffordable cost burden on the public purse or require early intervention to retrofit or “make good”. Our comments are written with a view to be helpful in shaping the next iteration of the Local Plan (the Regulation 19 Pre-Submission Plan) which is scheduled for publication/consultation by CCC in late Summer 2026.

ECC INTEREST IN THE ISSUES AND OPTIONS CONSULTATION

ECC is keen to inform, shape, support and help refine development strategy and policies delivered by Local Planning Authorities within and adjoining Essex. Involvement is necessary and beneficial because ECC is the:

- upper tier authority along with Southend and Thurrock unitary authorities responsible for strategic planning in accordance with the PIA;
- Highway and Transportation Authority, including responsibility for the development and delivery of the Essex Local Transport Plan; lead authority for Education including Early Years and Childcare, Special Education Needs and Disabilities, and Post 16 education; Minerals and Waste Planning Authority (MWPA); Waste Disposal Authority (WDA); LLFA; lead advisor on public health; and has responsibilities for adult social care in relation to the securing the right housing mix which takes account of the specialist and supported housing needs of older people and adults with disabilities;
- an infrastructure funding partner which seeks to ensure that development proposed is realistic and does not place an unnecessary (or unacceptable) cost burden on the public purse and, specifically, ECC’s capital programme;
- a major provider and commissioner of a wide range of local government services throughout the county (and where potential cross boundary impacts need to be considered);
- an advocate of the Essex Climate Action Commission (ECAC) report Net Zero – Making Essex Carbon Neutral, providing advice and recommendations for action on climate change mitigation including setting planning policies which minimise carbon, and address efficient use of water;
- partner and member in the North Essex Councils (NEC) a partnership of neighbouring councils that have come together to promote growth and prosperity in the region, where CCC is a member to.

DUTY TO COOPERATE (THE DUTY) OVERVIEW

The Duty to Cooperate is contained in the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011. It requires LPAs to ensure strategic planning is lead effectively through their Local Plans addressing social, environmental and economic issues that can only be addressed by effectively working with other authorities beyond their own administrative boundaries. A new CCC Local Plan may have an impact on ECC's functions depending on the final site allocations and the strategic and cross boundary infrastructure requirements this may generate as well as implications for any neighbouring LPA.

Paragraphs 24 to 28 of the NPPF stress that close cooperation between LPAs and county councils on strategic matters that cross administrative boundaries will be critical to ensure effective planning for strategic matters and necessary infrastructure.

The Minister of State for Housing and Planning wrote to the Chief Executive of the Planning Inspectorate in October 2025 setting out that the government remains committed to achieving universal local plan coverage, reinforcing the plan-led approach as central to the planning system. Local plans are vital tools for communities to guide housing and development decisions, and they provide certainty for developers. The Minister encouraged Inspectors to apply flexibility when examining local plans that are to be submitted for examination by the December 2026 deadline under the current plan-making regime, ensuring that legal and soundness tests, particularly the Duty, are assessed proportionately to the current planning context.

Further, a Ministerial Statement by the Minister of State for Housing and Planning on 27 November 2025 sets out the intention to lay regulations to remove the Duty for plans in the current system. The new Regulations have not come into force yet and whilst it is understood that there is a firm intention to remove the Duty, until these Regulations are laid and come into force (anticipated to be early 2026), there is still a legal duty to cooperate under the current legislation so the councils should continue to collaborate across their boundaries, including on unmet needs from neighbouring areas, and planning inspectors will continue to examine plans in line with the policies in the NPPF on 'maintaining effective co-operation'. This position has been confirmed by the Minister of State for Housing and Planning in a letter to the Chief Executive of the Planning Inspector dated 27 November 2025.

The upcoming changes to the Duty, subject to Regulations, does not negate the need for CCC to undertake effective ongoing strategic and cross boundary engagement with ECC in accordance with paragraphs 24 to 28 of the NPPF. This is critical as infrastructure delivery, and where applicable associated costs, will fall to a new unitary authority, not ECC, under local government reform.

ECC is continuing to carry out its functions properly in submitting comments on specific issues at this and previous stages of local plan preparation, and in identifying a potential need to

maintain those concerns at the next stages, including through to the Examination stage if not resolved.

ECC will continue to contribute cooperatively with CCC in the preparation of the new Local Plan through to examination. This will include assisting with further assessment of the impact on the transport and highway network while identifying appropriate mitigation; further assessment of the need for additional pupil places and education provision; and consideration of surface water management, amongst other matters, as CCC carries out further evidence work to identify a preferred spatial strategy. Given the strategic road network with the A12 and A120, ECC will also engage actively with National Highways (NH) to ensure that any strategic impacts arising from growth are considered on their network.

ECC RESPONSE TO THE COLCHESTER LOCAL PLAN – REGULATION 18 (PREFERRED OPTIONS LOCAL PLAN) (THE DRAFT PLAN)

Summary

The overall message is one of support for CCC undertaking a review of the adopted Local Plan to ensure an up to date plan prepared in accordance with the NPPF is in place. ECC will continue the on-going engagement with CCC, through the Duty (or any replacement), to assist progress of the Plan to Regulation 19 (the Pre-Submission Plan), particularly with regards the strategic and cross boundary implications, including cumulative issues and opportunities arising from growth to ensure that the infrastructure requirements are identified, quantified, costed and phased where appropriate. ECC service areas have clearly outlined where further collaborative work/assessment needs to be undertaken (e.g. education provision and ongoing transportation modelling) to refine and resolve an issue; and ECC will continue to be engaged, alongside NH, on the proposals which have an impact on the A12 strategic transport corridor, in particular A12 junctions 25 to 28, A12 widening and junction improvements, and the A120 Corridor Maks Tey to Braintree.

There is support for the Draft Plan's vision which covers environmental, social and economic needs and emphasises healthy living environments and green networks, environmental protection and economic growth. There is support that the mandatory housing target will be met in full and exceeded over the Plan period in accordance with the NPPF, and that future employment needs will be met (noting that some clarifications are sought) by providing a range in scale of additional employment land supply. ECC provides strong support for policies related to net zero carbon (in operation and embodied), water efficiency, health and well-being, and the environment (green and blue infrastructure and BNG. Recommendations are made throughout the response on policy wording (including policy omissions) and justification to strengthen clarity, effectiveness and delivery.

There is strong support for the inclusion of site-specific Place Policies and references to infrastructure requirements, but these will need to be reviewed and confirmed with ECC following this consultation and the agreement of a final spatial strategy by CCC. It is noted

there are some omissions in the Draft Plan such as the allocation of a new secondary school. On this issue, ECC acknowledges the requirement is stated in the Infrastructure Assessment Delivery Plan (Stage 3) for site allocation PP18 Land North of A120 Marks Tey; and in the Infrastructure Topic Paper prepared by CCC, where Appendix A lists the infrastructure requirements for the preferred options site allocations (including those for education). Land for the secondary school (and all education requirements) will need to be allocated in the Pre-Submission Plan.

The review of the IDP and full plan viability assessment are key documents for ECC engagement and input following this round of consultation. The Viability Assessment will need to be reviewed following consultation to ensure it can align with the most up to date evidence relating to the EPOA net zero development policies and its viability evidence. Mention is also made in the response to specific localities and sites – notably Marks Tey and Langham – where discussion needs to take place and recommendations are made to ensure effective delivery if these proposed allocations are taken forward to the Pre-Submission Plan.

Duty to Co-operate - specifics

ECC supports the preparation of a new Local Plan for CCC. ECC officers have and will continue to work closely with CCC through the Duty (or any replacement process) to refine and progress preparation of the emerging Local Plan and the supporting evidence required, to continue to work collaboratively on strategic and cross boundary issues (including engagement and co-operation with other organisations for which those issues may have relevance, for example NH), and to ensure ECC is able to assist in the viable delivery of key services and the provision of infrastructure arising from planned growth within Colchester City; whilst securing necessary funding. Key ECC activities to date are outlined below.

- Issues and Options (2023 and 2024) - responded to the thematic consultations.
- SLAA draft methodology (2023) - responded to the consultation.
- Attended various Duty meetings with CCC regarding ECC roles and responsibilities and strategic cross boundary matters covering transport, education, climate change, minerals and waste, Public Health, surface water management and SuDS, and net zero development (EPOA Greater Essex best practice model policies).
- Highways and transportation - CCC commissioned ECC (Jacobs/Essex Highways) to undertake the transportation modelling for the new Local Plan and have completed an assessment of the Preferred Option including junctions and the sustainable accessibility of locations/sites. The methodology aligns with that commissioned by the adjoining LPAs of Braintree and Tendring district councils, to ensure strategic and cross boundary transport impacts can be assessed, where both LPAs are also in the process of preparing new Local Plans. The initial report published in February 2025 is supplemented by additional modelling and analysis (October 2025) looking at impacts of the cancelled A12 widening scheme and the currently unfunded Phase 2 of the A1331 at TCBGC.
- Participated in Duty meetings with NH, regarding the modelling outputs for the impact of growth along the A12 (junctions 25 to 28) and the A120 and the supplementary transport report (October 2025) as noted above.

- Education - undertaken an education scenario assessment (primary, secondary, early years and childcare, SEND) of those sites considered by CCC for inclusion in the Draft Plan to assess the impact on existing, and identify the need for any new, education requirements. Where land for new education provision is needed these will need to be allocated in relevant site allocation policies in the Draft Plan. The assessment will be refined by ECC following this consultation and once the final spatial strategy and site allocations have been agreed by CCC.
- Minerals and waste - as MWPA ECC has informed the Site Selection Criteria of the SLAA; reviewed all sites considered for the Preferred Options and advised of policy requirements for specific sites to ensure compliance with the minerals and waste local plans (both form part of the development plan for CCC).
- Health and wellbeing - contributed to the baseline evidence and policy formulation with CCC in collaboration with North-East Essex Integrated Care Board Alliance and support from the Town and Country Planning Association (TCPA). Further refinement on policy and justification can take place for the Pre-Submission Plan.
- Reviewed and suggested relevant content for working draft versions of the Draft Plan's policies and justification.
- Net zero - ECC through the Climate and Planning Unit (CaPU) and the Essex Planning Officers' Association (EPOA) has lead the preparation of evidence (including legal justification), drafted policy wording and its justification for inclusion in local plans across Greater Essex. The Draft Plan includes the 'model policies' NZ1 and NZ2 (net zero carbon development (in operation/embodied carbon) that reflect this work. The policies should be updated to reflect the most current version which was done following the Uttlesford Local Plan examination hearings in June 2025. The CCC Draft Colchester Whole Plan Viability Assessment should also be reviewed to ensure there is an alignment with the viability work that underpins these model policies.
- Infrastructure Report - ECC has contributed to the CCC Local Plan Infrastructure Audit and Delivery Plan (IADP) stages 1 to 3, which establishes an infrastructure baseline and is the precursor to the IDP. ECC has provided further updates as part of this consultation response which CCC should reflect in the final IDP that will support the Pre-Submission Plan, as well as focused engagement following this consultation.
- Biodiversity net gain (BNG) - progressed the implementation of mandatory BNG and the Essex Local Nature Recovery Strategy (LRNS) through the Local Nature Partnership, for which ECC is the responsible authority, and appropriately reflecting the LRNS in the Draft Plan.

ECC will continue working with CCC as it prepares its Pre-Submission Plan. While this is not a duty to 'agree', regular and ongoing officer meetings (and potentially at specific times with Members) need to continue to ensure all of ECC representations made to this Draft Plan, and all strategic and cross boundary matters are discussed and resolved as plan preparation progresses. This will be documented through a SoCG. It is essential that Duty (or any replacement) discussions remain strong and ongoing and CCC fully engage ECC to identify and quantify infrastructure and service provision requirements as a result of the preferred spatial

approach given the amount of growth arising in CCC and neighbouring authorities such as Braintree, Maldon and Tendring districts.

Infrastructure delivery

It is imperative that all new development is supported by the required local and strategic infrastructure. A local plan needs to be supported by an IDP that reflects up to date costings, aligned with development phasing, and such requirements are appropriately reflected in the local plan and its site allocations policies. CCC has prepared an IADP (a precursor to the full IDP) and ECC has provided appropriate and proportionate inputs for its preparation at this stage of plan preparation.

Following this consultation, it is understood that CCC will prepare a full IDP (Stage 4 of the IADP), which will support the preparation of the Pre-Submission Plan. This must involve ECC in our role as an infrastructure and service provider and funder; and assess individual and cumulative impacts. The work will be used to further develop the Draft Plan's Place Policies (the site allocations) to ensure that all policies include up to date site specific infrastructure requirements including allocating land for specific infrastructure uses.

The IDP is a 'living' document, where assessments of costs, funding, delivery and phasing will continue to be updated, in conjunction with further work being undertaken with site promoters, ECC and funding partners. This ongoing review can ensure the best and most up-to-date information is available, particularly to inform any subsequent planning application process. The initial cost estimates / projections for infrastructure will also need to take account of indexation between the date of the IDP and when infrastructure delivery actually occurs. If this is not undertaken then certain schemes may be subject to a funding gap, and CCC and/or ECC should not be expected to fund any shortfall.

The Draft Plan includes Policy ST7: Infrastructure Delivery and Impact Mitigation, which is strongly supported and reflects a model policy that has been found sound and adopted in other Essex local plans. It is acknowledged that funding remains a key challenge and CCC indicate potential sources. CCC state they will continue to work with partners to prioritise projects and secure investment, which is strongly supported and ECC will also use its best endeavours in this regard.

It should be noted that ECC secured monies through the Housing Infrastructure Fund to enable the delivery of the Colchester Rapid Transit System and for Phase 1 of the A1331 (A120-A133 Link Road which is scheduled to be complete by March 2026). Both schemes facilitate the delivery of TCBGC and provide a wider and strategic benefit for the Colchester City area.

The Pre-Submission Plan and the IDP will also need to reflect the updated requirements and costs in the ECC Developers' Guide to Infrastructure Contributions, November 2025.

Spatial Strategy

ECC provides broad support for the continuation of the spatial strategy consistent with the adopted Local Plan, which focusses on the most connected locations or those with direct access to key services and facilities (greater opportunities for sustainable travel and to reduce the need to travel), along with taking advantage of existing and planned infrastructure improvements. The ECC response mentions specific localities (and sites) such as those in Marks Tey and Langham, where ongoing work is critical to address sustainable and viable delivery ahead of the Pre-Submission Plan.

ECC supports that the mandatory housing target will be met in full and exceeded over the Plan period in accordance with the NPPF, and that future employment needs are being met (noting that some clarifications are sought) by providing a range in scale of additional employment land supply.

Marks Tey is earmarked for growth with two strategic mixed use sites of 1,500 and 1,000 homes respectively (covered by Policies PP17 and PP18), together with employment land allocations. The requirements of PP17 and PP18 set out the need for a masterplan of the two ('entire') sites, where PP18 is promoted at a 'Garden Village scale'. However, it is recommended that this masterplan requirement should instead be for the whole Mark Tey Growth Area, incorporating the Draft Plan's policy area allocations as well as the existing communities and facilities into one comprehensive masterplan. This approach would also enable the locally prepared Neighbourhood Plan policies to be incorporated into the strategic growth of the area and a comprehensive approach to infrastructure provision and delivery could also be developed. A wider masterplan could be produced for the whole area and subsequent masterplans could be prepared for each development parcel that are in adherence to the wider masterplan. Without a single masterplan approach there is a considerable risk that severance and fragmentation will be exacerbated.

The Marks Tey northern site policy alludes to the potential growth of the wider area as a Garden Village (PP18 is described as a Garden Village but PP17 is not), however, it is not clear how the planning of the initial 1,000 homes (on PP17) relates to the wider growth potential beyond the Plan period, or even what the total capacity for the site will be. There is also no definition of 'Garden Village'. This is of particular concern given the importance of place making and the first phase of the Garden Village setting the foundations for wider growth. Accordingly, it is recommended that PP17 and PP18 need to be significantly strengthened to provide a suitable framework for enabling sustainable development and addressing severance around Marks Tey.

For Langham, the Draft Plan proposes an allocation of 900 homes. The village school, Langham Primary, has insufficient site area to facilitate significant expansion. The smallest new school supported by ECC is two forms of entry, requiring 2.18ha of suitable land. However, the establishment of a new school would create excess capacity which may be to the detriment of other local schools. At this stage, significant concerns are raised on education terms and if the site is to be progressed as part of the Pre-Submission Plan then a clear plan to provide

sufficient primary school places and a fully funded solution needs to be found. CCC will need to work with ECC following this consultation to discuss and work through possible options.

Education (including early years and childcare; primary, secondary and SEND)

ECC acting as the appropriate lead authority for education, has worked collaboratively with CCC in identifying potential school place planning issues arising from the new Local Plan and identified where new provision is required arising from local plan growth. An Education Needs Assessment (ENA) was undertaken using the process set out in the ECC 'Local and Neighbourhood Planners' Guide to School Organisation'. The assessment looks at the impact of local plan growth on existing education facilities and identifies the need for any new, primary, secondary, early years and childcare facilities, and Special Education Needs (SEND) requirements. The ENA will need to be updated for the Pre-Submission Plan where the final spatial strategy will be assessed.

It is noted that most of the relevant Draft Plan Place Policies include reference to site specific new education provision (broadly reflecting the NEA provided to CCC 11/8/25 and based on CCC housing data) but there are omissions. The local plan must also specifically allocate land for education and EYCC use to set land values (including education land that forms part of extant planning permissions - failure to do this risks the loss of the options secured, in the event new planning permissions are sought by the developer); and the land must meet the criteria set out in the ECC Developers' Guide to Infrastructure Contributions and facilitate delivery compliant with the Essex Design Guide School Design Guidance (2.18ha site for primary school and EYCC). CCC will need to address these three issues as part of the Pre-Submission Plan.

While relevant Draft Plan Place Policies include reference to site specific new education provision from the IADP (broadly reflecting the NEA, although there are omissions), the local plan must specifically allocate land for education and EYCC use to set land values (including education land that forms part of extant planning permissions - failure to do this risks the loss of the options secured, in the event new planning permissions are sought by the developer); the land must also meet the criteria set out in the ECC Developers' Guide to Infrastructure Contributions and facilitate delivery compliant with the Essex Design Guide School Design Guidance (2.18ha site for primary school and EYCC).

The ENA identified the need for at least one new secondary school to serve Colchester, in addition to new facilities that serve TCBGC. The secondary school requirement has not been included in the Draft Plan and will need to be allocated in the Pre-Submission Plan. ECC acknowledges the requirement is stated in the IADP (Stage 3) for site allocation PP18 Land North of A120 Marks Tey; and in the Infrastructure Topic Paper prepared by CCC, where Appendix A lists the infrastructure requirements for the preferred options site allocations (including those for education). It is understood this was done as the Draft Plan was not amended following its deferral for consultation by CCC in 2025. Instead the evidence base (in this case the IADP) reflects the updated education requirements for this Regulation 18 stage, and these requirements (and any updates) will then be included in the Pre-Submission Plan.

ECC will maintain ongoing engagement with CCC on this issue to ensure necessary education infrastructure is allocated in the Local Plan.

PP18 makes note of this allocation expanding to become a Garden Village, beyond the Plan period. However, as noted above, the Draft Plan omits on-site education and childcare provision for the first 1,000 homes allocated in this Plan period (but is reflected in the IADP Stage 3 and the Infrastructure Topic Paper). Allocating land for an all-through school on this site in anticipation of longer-term growth could address wider un-met secondary school need arising from local plan growth.

The new Local Plan will need to allocate and deliver the following:

- land for one new secondary school (either all through or co-located);
- land for at least three new primary schools with commensurate EYCC provision;
- land for education use that forms part of extant planning permissions at Chesterwell, North Colchester; London Road, Stanway; and Barbrook Lane, Tiptree.

SEND provision - ECC tested the development scenario set out within the emerging CCC development trajectory and found that development to 2041 could result in SEND requirements for 201 pupils requiring an Education, Health and Care Plan in mainstream schools and a further 124 requiring a special school placement. The current SEND capital programme is nearing completion, but there is still unmet demand in Essex. The latest sufficiency assessment has highlighted the need to create a new SEND capital programme, maximise developer contributions, and utilise any future DfE special free school opportunities. ECC are also looking at savings that can be made elsewhere to invest in Essex schools to create more provision. An updated position can be provided following this consultation and as part of the preparation of the Pre-Submission Plan.

Highways and Transportation

ECC, as the Highways and Transportation Authority, has completed a proportionate transport assessment for the Regulation 18 stage using the North Essex Model (NEMo), in consultation with CCC and engaged with NH. The evidence confirms that unmitigated growth from preferred site allocations would cause severe congestion at key locations, but a vision-led mitigation strategy combining sustainable transport measures with targeted highway and traffic management interventions can manage these impacts. To do nothing or 'Business as Usual' will not be acceptable. The approach reflects and supports the NPPF and keeps people and goods moving, but further detail on key schemes will be required to inform the Regulation 19 stage.

The initial transport evidence report (February 2025) established baseline conditions and tested growth scenarios assuming completion of the A1331 link road and A12 widening. The Further Transport Evidence report (October 2025) expanded this work through:

- testing scenarios without A12 J19–25 widening (cancelled July 2025) and with delayed A1331 link road completion;

- applying the NEMo, verified by NH, to assess cumulative impacts of reference case growth and preferred site allocations;
- developing a vision-led mitigation strategy combining sustainable transport measures with targeted highway and traffic management interventions e.g., A12 J25 capacity enhancements, signalisation at Greenstead and Ipswich/Harwich Road roundabouts, dynamic traffic management systems; and
- directly informing the IADP by identifying transport interventions required to support the Preferred Options at the Regulation 18 stage of assessment.

The methodology / approach to mitigation, to address network capacity, seeks to significantly reduce the need for journeys to be reliant on vehicle trips from the new developments and looks to the wider existing network to support increased mode shift to sustainable travel modes. Whilst this will not negate the need for some highway capacity improvement works in places, it accords with NPPF and policy guidance and a more cost effective approach to addressing the capacity on the network. This will be reflected in the mitigation and inform the later stage of the IADP/IDP and the local plan viability testing.

Further refinement of mitigation packages and costings will occur in inform the Pre-Submission Plan and the IADP, with continued engagement with NH and neighbouring LPAs. Following this consultation and ahead of the Regulation 19 stage, the transport evidence base must be updated to reflect fixed site allocations, committed infrastructure, and detailed mitigation proposals. This will require re-running the NEMo in accordance with DfT TAG guidance, moving from strategic assessment to detailed junction-level analysis, and confirming that residual cumulative impacts are not “severe” as per NPPF paragraph 116. The evidence should demonstrate deliverability of sustainable transport measures. The approach outlined in the Draft Plan’s Further Transport Evidence (October 2025) provides a sound framework for this update, but more granular modelling and safety assessments will be essential to support soundness and compliance with national policy. Specific requirements and any mitigation measures will need to be identified in the Place Policies as part of the Pre-Submission Plan.

ECC supports the policies that promote and seek to deliver active and sustainable travel. This will help implement the key recommendations arising from the Essex Climate Action Commission’s report ‘Net Zero: Making Essex Carbon Neutral (2021)’ and the emerging Essex Local Transport Plan (LTP4). It is also recommended that the Draft Plan updates references to LTP4 (scheduled for adoption in February 2026), which among other things sees transport investment as a core economic enabler. Development proposals should align with the Essex LTP4 and the Colchester Implementation Plan, prioritising active and sustainable travel and demand management measures to reduce car dependency. Various amendments are recommended to CCC to strengthen policy and delivery. It is noted and supported that the Draft Plan will use the EPOA Parking Guidance 1 and 2 for parking standards.

It is recommended that all sites included in the new Local Plan are assessed using the DfT connectivity tool. The tool has been available to authorities in developing Local Plans and is now available to the development industry and the public. The consultation draft NPPF (December 2025) promotes the use of the DfT Connectivity Tool to assess locations for sustainable development.

Minerals and Waste

The MWPA has identified site policy requirements in Section 4 (Place Policies) of the Draft Plan, where liaison with the MWPA is required to address minerals and waste matters given proximity to minerals and waste sites; and specifically requirements for a Mineral Resources Assessment and Minerals and Waste Infrastructure Impact Assessments to be undertaken to prevent the sterilisation of proven mineral reserves and secure the safe and efficient operation of safeguarded mineral or waste sites.

Economic Growth

ECC supports that the Draft Plan will meet future employment needs by providing a range of additional employment sites amounting to a total of 41.7 ha of land up to 2041, aimed at balancing new homes and jobs. Clarity is sought on the employment land figure as to whether this comprises 'carry over' from the current adopted Local Plan. The Essex Sector Development Report (2023) provides key local evidence to support relevant plan policies with regards the growing employment sectors that are set to create new jobs needed over the next 30 years including construction, clean energy, advanced manufacturing and engineering, digi-tech, life sciences, and health and care, and professional and support sectors.

ECC supports Policy E1: Protection of Employment, which safeguards all land and premises currently in employment use primarily for class E(g), B2 and B8 Use Classes. However, amendments are proposed as the policy should include best practice guidance on providing evidence to justify and support the release of employment uses.

It is recommended that a comprehensive masterplan is prepared for the Hythe Opportunity Areas given the complex opportunities and constraints and to protect Colchester City Centre from undue competition. The Draft Plan should recognise the role these opportunity areas play in providing employment opportunities for residents, including those in deprived communities in Greenstead, and the severance caused by the railway, River Colne and major roads, as well as the restrictions across the level crossing on Hythe Station Road.

Climate Change and Net Zero Development

ECC welcome the inclusion of Chapter 7, and specifically policies NZ1 and NZ2 which broadly reflect the Planning Policy Statements for Greater Essex (which set out recommended policies - Policy GE1: Operational Energy and Carbon (net zero) in homes and buildings, and Policy GE2: Embodied Carbon and Circular Economy in homes and buildings) published on the Essex Design Guide and which are underpinned by a technical evidence base collaboratively prepared on behalf of all the authorities in Greater Essex. This demonstrates the standards are

technically feasible, financially viable and legally justified. The work has been led by CaPU at ECC, with funding from ECAC, and builds upon the consistent approach being implemented across Greater Essex where similar policies have been / are being embedded into Local Plans. The response puts forward various amendments to update the policies to the latest versions and evidence base.

ECC also welcomes the inclusion of Policy NZ4 which provides a positive policy approach towards renewable energy development. ECC supports the clause relating to community-led energy schemes, recognising that the positive benefits such schemes can bring should be considered as a material consideration in decision-making on planning applications. An additional clause is recommended to ensure that all schemes benefit host communities.

BNG and Green and Blue Infrastructure (GBI)

It is welcomed that the Draft Plan has been prepared alongside the LNRS (where ECC is the responsible authority), which has provided evidence of the actions to reverse the current path of decline and bring about a recovery for nature. The LNRS identifies locations to create or improve habitat most likely to provide the greatest benefit for nature and the wider environment. These findings are reflected in relevant policies to ensure delivery of the LRNS. ECC recommends various amendments to aid effective policy delivery.

Given the scale and greenfield nature of strategic allocations being proposed in the Draft Plan, ECC evidence indicates that 15-20% BNG is viable and achievable (over and above the mandatory 10%). It is recommended introducing a higher BNG target for strategic sites, subject to viability testing, to deliver enhanced environmental outcomes and align with Essex-wide ambitions.

ECC support policies related to GBI especially references to this being multifunctional, the need for SuDS and with various recommendations made to ensure policy wording (and the justification) is clear, effective and aids delivery. The Draft Plan should also have regard to the Essex GI Strategy and GI Standards (where CCC was a partner in their preparation), the latter being prepared in collaboration with partners including CCC and endorsed by Natural England.

Flood and Surface Water Management

ECC as the LLFA has ensured surface water management and drainage considerations are included in site and development management policies. Various amendments are made to aid effective delivery and compliance with national policy. All site allocation policies require appropriate surface water management and SuDS to be provided. As a statutory consultee on surface water, ECC as the LLFA will require that all new developments must implement the Essex SuDS Design Guide and GI Standards to ensure they do not add pressure to existing sewerage systems or negatively impact the ecological status of waterbodies. ECC, as LLFA, should be consulted on the scoping of Flood Risk Assessments and input to relevant site SuDS strategies.

Water Efficiency and Water Supply

ECC provides strong support for the target set in Policy NZ3: Wastewater and Water Supply which requires a water efficiency target of 80 litres/person/day to address capacity and efficiency challenges which aligns with CCC local plan evidence in the Water Cycle Study. The Water Strategy for Essex (ECC, 2024) recommends that Local Plan policies should set ambitious policies for water efficiency and resilience for new homes and non-residential development to reduce the impact of water security on economic growth.

ECC recommends that reference to greywater recycling for domestic properties be omitted from Policy NZ3, as there is currently extensive legislation which restricts the use of communal greywater reuse systems managed by water companies. While this does not prohibit the use of single property systems managed by a homeowner, these are still considered to be generally cost prohibitive. Commercial development such as hotels should still consider grey water reuse where this is considered viable.

Specialist and Supported Housing (including Adult Social Care)

ECC supports Policy H5: Specialist Housing including Housing for an Aging Population. The policy can be refined as ECC has now published a report 'Supported and Specialist Housing and Accommodation Needs Assessment' (August and updated December 2025), which provides a robust and local evidence base regarding who needs specialist accommodation to meet their needs due to their age, health, disability, mental health, cognitive ability or living with Learning Disability or Autism. The report and its findings as they relate to the Colchester City area can be referenced in the Pre-Submission Plan. ECC officers will work with CCC to provide appropriate wording.

Health and Wellbeing

ECC as the lead advisor on Public Health welcome and provide strong support that health and wellbeing outcomes are considered as an overarching theme and a strategic objective for the new Local Plan. Strategic Policy ST1 (Health and Wellbeing) is supported and ECC also welcome and support the inclusion of the Policy PC1 (Healthier Food Environments) in line with the NPPF paragraph 97 looking to manage hot food takeaway in the City. Detailed comments are provided to strengthen policy and justification provisions.

It should also be noted that ECC Spatial Planning and Public Health teams have developed a programme to support local public health practitioners by working with planning policy and development management officers on the use of HIAs including monitoring their delivery and effectiveness. This includes CCC.

Stewardship

ECC recommends additional policy requirements that support the establishment of a robust and sustainable stewardship structure early in the planning and delivery process for large scale strategic sites. As an infrastructure delivery organisation, ECC has a critical interest in the design and delivery of successful stewardship arrangements in new developments,

particularly garden communities and villages. Our statutory roles and responsibilities all interact with stewardship arrangements in some form and as such early engagement with ECC is necessary to complement proposals for more localised management of relevant assets and services by stewardship bodies. Additional policy requirements should require stewardship activities to be in place for the first housing occupations to ensure timely delivery of community development activities and for an Asset Schedule to be prepared by applicants with the express agreement of CCC and ECC (or any future local authority given LGR).

Whole Plan Viability

CCC commissioned Newmark (formally Gerald Eve) to produce an up-to-date viability assessment of the draft policies in the Draft Plan that adheres to Planning Practice Guidance (PPG). However, the assessment does not reflect the viability evidence and inputs that support the EPOA net zero model policies included in the Draft Plan. The CCC report should be reviewed to ensure that the costs used align correctly. There are also other things to consider such as including an uplift in the value of the houses built to the higher standards. This can take place as part of preparing the Pre-Submission Plan.

Table 1 provides a more detailed response following the format and layout of the Draft Plan.

Table 1: ECC Response to Colchester Preferred Options Local Plan Reg 18 Consultation, November 2025 (response dated 14 January 2026)

In addition to the comments provided above, please refer to detailed comments below.

Document Reference	COMMENTS / CHANGE REQUIRED
<p>General Comment</p>	<p>Transport Summary Essex County Council (ECC), as the Highways and Transportation Authority, has completed a proportionate transport assessment for the Regulation 18 stage using the North Essex Model, in consultation with Colchester City Council and engaged with National Highways. The evidence confirms that unmitigated growth from preferred site allocations would cause severe congestion at key locations, <u>but</u> a vision-led mitigation strategy combining sustainable transport measures with targeted highway and traffic management interventions can manage these impacts. The approach reflects and supports the NPPF, and keeps people and goods moving, but further detail on key schemes will be required to inform the Regulation 19 Pre-Submission Plan.</p>
<p>General Comment</p>	<p>Duty to Cooperate – Transport Position Colchester City Council (CCC) commissioned Essex County Council (ECC), supported by Jacobs/Essex Highways, to undertake strategic transport modelling for the new Local Plan. The assessment covers the Preferred Options and evaluates junction performance, network resilience, and sustainable accessibility of proposed allocations. The methodology aligns with that used by adjoining Local Planning Authorities (LPAs) – Braintree and Tendring DCs, ensuring that strategic and cross-boundary transport impacts are consistently assessed. This is critical given shared infrastructure such as the A12 and A120 corridors and the Tendring Colchester Borders Garden Community (TCBGC).</p> <p>The initial transport evidence report (February 2025) established baseline conditions and tested growth scenarios assuming completion of the A1331 link road and A12 widening. The Further Transport Evidence report (October 2025) expands this work by:</p> <ul style="list-style-type: none"> • Testing scenarios without A12 J19–25 widening (cancelled July 2025) and with delayed A1331 link road completion. • Applying the North Essex Model (NEMo), verified by National Highways (NH), to assess cumulative impacts of reference case growth and preferred site allocations. • Developing a vision-led mitigation strategy combining sustainable transport measures with targeted highway and traffic management interventions (e.g., A12 J25 capacity enhancements, signalisation at Greenstead and Ipswich/Harwich Road roundabouts, dynamic traffic management systems).

Document Reference	COMMENTS / CHANGE REQUIRED
	<ul style="list-style-type: none"> • The Further Transport Evidence (October 2025) has directly informed the Infrastructure Audit and Delivery Plan (IADP) by identifying transport interventions required to support the Preferred Options at the Regulation 18 stage of assessment. <p>Key findings:</p> <ul style="list-style-type: none"> • Unmitigated growth would result in severe congestion at Greenstead, Ipswich Road, Lexden Road corridor, A12 J25, and Northern Approach Road. • Integrated mitigation reduces these impacts to acceptable levels – based on a strategic level of detail of schemes proportionate to the Regulation 18 stage • Sustainable transport measures alone significantly reduce car trips but require complementary highway schemes to maintain network performance and safety. <p>Engagement and Cross-Boundary Coordination</p> <p>CCC and ECC have participated in Duty to Cooperate meetings with NH to review modelling outputs for A12 and A120 routes, including implications of cancelled A12 widening. These discussions inform shared understanding of strategic network constraints and mitigation priorities across North Essex.</p> <p>Policy Alignment and Next Steps</p> <ul style="list-style-type: none"> • The draft Essex Local Transport Plan (LTP4) – <i>A Better Connected Essex</i> – is scheduled for adoption in February 2026 and will need to be reflected in the Regulation 19 Local Plan, particularly policies on sustainable transport, dynamic traffic management, mode share targets and monitoring, and integration of land use and transport planning. <p>Further refinement of mitigation packages and costings will occur through the Infrastructure Audit and Delivery Plan (IADP) to inform the Regulation 19 Pre-Submission Plan, with continued engagement with NH and neighbouring LPAs. For Regulation 19, the transport evidence base must be updated to reflect fixed site allocations, committed infrastructure, and detailed mitigation proposals. This will require re-running the NEMo in accordance with DfT TAG guidance, moving from strategic assessment to detailed junction-level analysis, and confirming that residual cumulative impacts are not severe as per NPPF para. 116. The evidence should demonstrate deliverability of sustainable transport measures and integration with the IADP. The approach outlined in the Further Transport Evidence report (Oct 2025) provides a sound framework for this update, but more granular modelling and safety assessments is essential to support soundness and compliance with national policy for Regulation 19 stage.</p>

Document Reference	COMMENTS / CHANGE REQUIRED
General Comment	<p>Education and EYCC land that forms part of any extant planning permission must be allocated for such use in the new Local Plan. Failure to do this risks the loss of the options secured, in the event new planning permissions are sought by the developer. These sites include:</p> <ul style="list-style-type: none"> ● Chesterwell, North Colchester: COL/12/1272 ● London Road, Stanway: COL/21/2507 ● Barbrook Lane, Tiptree: COL/18/2014
Para 1.14	<p>Update required. ECC is progressing the replacement of the Essex Transport Strategy with Local Transport Plan 4 (LTP4). The strategic framework was consulted on in summer 2024, and the draft plan <i>A Better Connected Essex</i> was published for consultation in July 2025. Adoption is anticipated in February 2026, and its requirements will need to be embedded in the Regulation 19 Local Plan. ECC will assist with appropriate updated wording.</p>
Introduction County Level Plans Essex Minerals Local Plan Para 1.8	<p>This states 'Refer to the Essex Mineral Local Plan for information about potential Mineral Safeguarding Areas in parts of Colchester outside of the scope of the Local Plan Policies Map'. However, it should not be the case that there are any MSAs outside of the Local Plan Policies Map. Regulation 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 require the LPAs policy map to include <u>all</u> Development Plan policies. It is noted that spatial policies pertaining to minerals and waste (Mineral Safeguarding Areas/Mineral Consultation Areas/Waste Consultation Areas) are not displayed on the policies map. This should form part of the Regulation 19 Local Plan Policies Map.</p>
Introduction County Level Plans Essex Minerals Local Plan Para 1.9	<p>Further information is required on minerals and waste.</p> <ol style="list-style-type: none"> 1. Insert 'The extent of Mineral Consultation Areas are also shown on the Policy Ma' line 5. 2. Include information for MWPA to signpost for advice. Insert '<u>Please contact Essex County Council as the Minerals and Waste Planning Authority for any queries in relation to the application of minerals safeguarding policy</u>', after line 5.
Introduction County Level Plans	<p><u>Other County Plans and Strategies</u></p> <p>It is welcomed that the Essex GI Principles are referenced on page 77 paragraph 5.7, but the Essex GI Strategy and Standards are not referenced elsewhere. It is strongly recommended the Local Plan consider, apply and reference the Essex GI Strategy (2020) and the Essex GI Standards (2022) (prepared with and endorsed by Natural England). These documents champion the enhancement, protection, and creation of an inclusive and integrated network of green spaces. Applying Essex's nine GI principles will help to ensure quality and consistency in the provision, management, and stewardship of GI an essential part of place-making and place-keeping for</p>

Document Reference	COMMENTS / CHANGE REQUIRED
Introduction Paras 1.16 – 1.17	<p>the benefit of people and wildlife. This will ensure the Local Plan is aligned with the adopted Essex GI Strategy and Standards Guidance which have been endorsed by Natural England and awarded Building with Nature Policy accreditation. CCC was a partner in the preparation of the GI Strategy and Standards.</p> <p>ECC have published a Water Strategy for Essex (2024) and this study and its supporting evidence, can support the direction taken in regard to water conservation. To align developments with the Essex Water Strategy, it is essential to –</p> <ul style="list-style-type: none"> ● implement water-saving technologies like low-flow fixtures and rainwater harvesting ● promote sustainable land use practices, such as green spaces and permeable surfaces, to enhance water retention ● integrate natural green infrastructure, including green roofs and urban forests, to improve water management ● invest in alternative water sources like recycled water and desalination ● collaborate with stakeholders to address water challenges collectively. <p>These steps will contribute to a sustainable and resilient water future for Essex.</p> <p>The Essex Local Nature Recovery Strategy (ELNRS) was published and adopted in July 2025. The Natural Environment section of planning practice guidance has been updated in February 2025 to include guidance on the role of LNRs and can be viewed here. This guidance helps LPAs to interpret their duty to “have regard” to LNRs and integrate LNRs into local plans and considering them in planning decisions as material considerations. LPAs should evaluate how individual development proposals can conserve and enhance biodiversity and geodiversity, as well as contribute to habitat connectivity in the broader area. This update is a legal requirement from the Environment Act 2021 and aligns with the NPPF.</p> <p>The ELNRS strategy and maps aims to implement county-wide nature recovery initiatives, highlighting key biodiversity areas and opportunities for habitat creation or improvement. The ELNRS features three main types of maps:</p> <ul style="list-style-type: none"> ● Strategic Opportunities - These are areas identified as having potential to become important for biodiversity through habitat creation: <ul style="list-style-type: none"> ○ Woodland ○ Grassland ○ Scrub ○ Freshwater (Standing Water & River Buffers) ○ Coastal and Marine habitats

Document Reference	COMMENTS / CHANGE REQUIRED
	<ul style="list-style-type: none"> • Areas of Particular Importance for Biodiversity (APIBs) - These include nationally and locally designated sites. • Potential Opportunities – identifies urban and other areas where habitat creation could be beneficial. <p>These present opportunities to enhance biodiversity and create habitats, contributing positively to the local environment. Conservation efforts might be more concentrated on nearby areas identified as top priorities for habitat creation as identified in these maps that can be viewed here.</p> <p>The LNRS is a key tool for developers, helping to identify optimal locations for biodiversity delivery. It highlights both strategic opportunity areas and broader opportunity zones, including locations without specific strategic priorities where ecological gains can still be achieved.</p>
Para 2.2	<p>ECC and in its role as lead advisor on Public Health welcome and support that health and wellbeing outcomes are considered as an overarching theme and a strategic objective for the Local Plan that is embedded throughout the policies in the Local Plan.</p>
Para 2.4	<p>The Environment Act 2021 requires LPAs to have “regard to” Local Nature Recovery Strategies (LNRS) when creating local plans and making planning decisions. This should be reflected in the Pre-Submission Plan and amended accordingly.</p>
Vision Para 2.19	<p>ECC welcome that the Local Plan vision strongly incorporates Green Infrastructure (GI) through well-connected green networks and waterways. This commitment is essential for delivering multifunctional benefits for people and nature, supporting climate resilience, and enhancing health and wellbeing. The emphasis on preserving and enhancing Colchester’s identity through its diverse natural environment, green networks, and waterways aligns with the Essex Green Infrastructure Strategy and Standards. ECC particularly support the vision’s focus on:</p> <ul style="list-style-type: none"> • Provision of new open spaces and biodiversity net gain. • Creation of wildlife corridors to improve habitat connectivity. • Integration of green networks with active travel routes and public transport to promote sustainable movement and healthy lifestyles. <p>This approach demonstrates a positive step towards mainstreaming GI in place-making and ensuring that growth contributes to a better environment and quality of life for communities.</p>
Vision Paras 2.20	<p>The vision sets out opportunities for contributing to healthy lifestyles. However, para 2.20 on how it will be achieved focuses on environmental and infrastructure measures but doesn’t explicitly link them to health and wellbeing outcomes or policies like the food environment.</p>

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>Suggested additions:</p> <ul style="list-style-type: none"> • Active travel and public transport – to reduce air pollution, increase physical activity, and improve mental wellbeing. • Green networks and open spaces – to support physical activity, reduce stress, and improve community cohesion. Explicitly mention healthy food access as part of infrastructure and placemaking: • New developments will include measures to create healthier food environments, such as supporting local food growing, ensuring access to affordable nutritious food, and limiting the proliferation of unhealthy food outlets. <p>It is recommended para 2.20 is amended to read as follows.</p> <p>“This will be achieved through provision of new open spaces, biodiversity net gain, and wildlife corridors to create better connections between habitats and people, supporting physical and mental wellbeing. Healthy food environments will be promoted by enabling access to affordable nutritious food, supporting local food growing initiatives, and managing the density of unhealthy food outlets. Colchester will have a real sense of community and be welcoming and inclusive—a destination of choice. Sustainable and inclusive communities will be created with a focus on diversity of place and valuing what is unique to Colchester—the countryside, coast, and city. Communities will have a varied mix of housing to meet the needs of all, including social and lower income households; and a range of jobs, including careers, that support a strong local economy and reduce the need for residents to commute outside of Colchester. Colchester’s distinctive arts, culture, heritage, and tourism will improve the quality of life for residents, foster life-long learning, and boost the local economy. There will be enhanced public transport corridors and routes and an increase in active travel, reducing air pollution and promoting healthier lifestyles. Infrastructure will be future-proofed and delivered where it is needed, with innovative solutions that respond to climate change and support community health.”</p>
Themes and objectives Para 2.21	<p>It is recommended that there are additional explicit bullet points under healthy, vibrant and diverse places that then link back to the health and wellbeing overarching theme and strategic objective with a strong focus on prevention.</p> <ul style="list-style-type: none"> • “Create healthier food environments by managing the location and concentration of unhealthy food outlets to tackle obesity and diet-related inequalities” (links to policy PC1) • “Protect and enhance the environment to prioritise the prevention of ill-health and support mental and physical wellbeing”
Themes and objectives Para 2.21	<p>It is recommended expanding the first bullet point under “Healthy, vibrant and diverse places”:</p> <ul style="list-style-type: none"> • Protect stretches of undeveloped countryside, enhance the quality of natural environment creating net gains to biodiversity, contributing to local nature recovery priorities and the creation of better-connected green networks and waterways.

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>This should include wildlife corridors and multifunctional green infrastructure that strengthen ecological connectivity, align with the ELRNS, and deliver measurable benefits for biodiversity and climate resilience.</p>

<p>Policy ST1 Health and Wellbeing</p>	<p>ECC welcome that Policy ST1 recognises the critical role of Green Infrastructure, Biodiversity Net Gain (BNG) and the Local Nature Recovery Strategy (LNRS) in delivering health and wellbeing benefits. Embedding these elements within the health and wellbeing agenda ensures that new development not only provides access to natural environments but also contributes to nature recovery and climate resilience. The emphasis on green and blue infrastructure and open spaces is particularly important for creating active, sustainable communities. Well-connected green networks and wildlife corridors will enable people to enjoy safe, attractive routes for walking and cycling, while simultaneously improving habitat connectivity and supporting the delivery of LNRS priorities. This integrated approach will help reduce health inequalities, promote active lifestyles, and enhance resilience to climate change impacts.</p> <p>ECC and as the lead advisor for Public Health, welcomes and supports Strategic Policy ST1, which aims to ensure that health and wellbeing outcomes are embedded throughout the Local Plan, and that all proposals promote the health and wellbeing of local communities in line with the NPPF. ECC makes the following recommendations to strengthen the policy and implementation of Health Impact Assessments: engaging prior to commencement, including C2 Use Class within HIA requirements, incorporating monitoring measures and ensuring robust processes in line with the EPOA Planning and Health Protocol.</p> <p>ECC recommends reference is made to the Essex Design Guide, Healthy Places Guidance and Health Impact Assessment checklist endorsed by the Essex Planning Officers Association (EPOA). The Essex Design Guide contains extensive explanatory information and guidance on:</p> <ul style="list-style-type: none"> • Health and Wellbeing – how positive characteristics and qualities of an environment can help people to achieve and experience better quality lifestyles. • Active Design Principles – provides guidance and a detailed checklist to guide the design (an evolution) of developments and through which to assess them in relation to health and wellbeing matters. This is included within the Essex Healthy Places guidance and checklist which has been endorsed by the Essex Planning Officers Association. • Livewell Development Accreditation (LDA) and Health Impact Assessment (HIA) – the LDA accredits developers in recognition of their contributions to health and wellbeing. This is based on a two-stage assessment using the new HIA criteria and a review by the Essex Quality Review Panel • Health Impact Assessment (HIA) - relevant applications will need to be subject to the guidance in the Essex Healthy Places Advice Notes for Planners, Developers and Designers to ensure health and wellbeing is comprehensively considered and integrated into Plans and Development management policies. ECC recommends that these are to be required for residential developments of 50+ homes; Any other types of developments involving 1,000m2 of new floorspace; and C2 use class developments. • ECC Developers Guide to Infrastructure Contributions (Revised 2024) – public health matters are included in section 6.6 including advice on healthy place-making
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- Reference to the need to undertake a Health Impact Assessment should be referenced in the Local Validation List.

The Health and Wellbeing Policy including the use of Health Impact Assessments should look to cover health and wellbeing in terms of the wider determinants of health and include references to matters such as:

- Contribute towards the strategic priorities of both [Essex Joint Health and Wellbeing Strategy](#) to help reduce health inequalities and improve the opportunities for adults and children to live well.
- [Link to Essex Joint Strategic Needs Assessment](#)
- have good access to services and facilities to support daily life and provide for the needs of their communities including education, employment, retail, public transport, healthcare, social, community and greenspace
- be well designed to create safe, inclusive, and accessible places for all users and encourage social interaction and wellbeing
- Provides opportunities for access to services, facilities, and nature to support residents living with or affected by dementia, poor mobility, physical or sensory impairments.
- create opportunities for healthy and active lifestyles including access to and the provision of new multifunctional green and blue infrastructure, spaces for play, recreation and sports, and better active travel including provision for safe and attractive well-connected pedestrian and cycle routes to support mental health wellbeing
- provide good quality housing both externally and internally, to provide a healthy living environment now and in the future
- support the provision of cultural infrastructure and public art to create a sense of place and identity
- is climate resilient and as sustainable and energy efficient as possible to promote healthy environments
- provide appropriate mitigation to avoid harmful health impacts/emissions.
- provide opportunities for community involvement in the long-term management and stewardship of the new development
- provide opportunities for growing food such as allotments, community gardens and orchards to improve access to local healthy food
- creation of walkable neighbourhoods to support people to live healthy lifestyles having regard to the Essex Design Guide – A New Development Model for Essex
- incorporation of Sport England and National Design Guide Active Design principles
- Creation of a physical environment where people have the resilience to with life's changes across the life course, such as a dementia-friendly environment

As per EPOA Planning and Health Protocol, ECC recommends the following additions to the policy:

“A Health Impact Assessment will be required for all residential development in excess of 50 units, **C2 use class**, or non-residential development in excess of 1,000sqm and hot food takeaways and fast food outlets in accordance with Policy PC1, in order to demonstrate that the development would have an acceptable impact on health and wellbeing. The Council will require Health Impact Assessments to be prepared having regard to the most up to date advice and best practice for such assessments. The purpose of the Health Impact Assessment will be to identify the potential health consequences of a proposal.

The HIA must:

- **Be undertaken at an early stage of the planning process**
- **Based on the latest Healthy Places Guidance (as promoted by the Essex Planning Officer’s Association)**
- **Informed by current local public health data and community insight**
- **Used to inform the design and layout of the proposal**

The scope of the HIA should be agreed prior to commencement of the assessment with development management and public health officers.

The council will require the Health Impact Assessment to be prepared having regard to the most up to date advice and best practice for HIAs. The assessment should include recommendations on how positive impacts can be maximised and negative impacts on health inequalities avoided or mitigated.

This policy should link to Place Policies which articulates a need to address specific health inequalities. ECC recommends including the following:

Development proposals across the Place Specific Policies must demonstrate compliance with both Policy ST1 and the relevant Place Policy.”

ECC recommend that specific monitoring metrics are included to monitor the effectiveness of the Health and Wellbeing Policy, such as the number of HIA’s submitted and those completed to a good standard as part of the quality assurance process as per EPOA Planning and Health Protocol.

Document Reference	COMMENTS / CHANGE REQUIRED
<p>Policy ST2 Environment and the Green Network and Waterways</p> <p>And (p 24–26; paras 3.7–3.16)</p>	<p>ECC welcomes the strong reference in Policy ST2 to the use of Natural England’s Environmental Benefits from Nature Tool, and the requirement for proposals to have regard to the ELNRS and the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). This demonstrates a clear commitment to integrating nature recovery and biodiversity priorities into development planning.</p> <p>ECC particularly supports the requirement for major residential development proposals to prepare a Green Network and Waterways Plan, as this aligns with the Essex GI principles and ensures connectivity between habitats and communities. We recommend Policy ST2 is expanded so a Green Network and Waterways Plan is mandatory for all major schemes (residential and non-residential) and strategic allocations, demonstrating delivery of multifunctional GI in line with the Essex GI Strategy (2020) and Essex GI Standards (2022 requirement).</p> <p>Recommendation: To further enhance the delivery of high-quality GI and urban nature, it is recommended that Policy ST2 also considers the application of the Urban Greening Factor (UGF) for urban and brownfield sites. UGF is a recognised planning tool that can help quantify and secure greening measures, contributing to biodiversity net gain, climate resilience, and improved health and wellbeing outcomes.</p> <p>Essex GI Strategy (2020) and Essex GI Standards (2022) (endorsed by Natural England) provide the nine GI principles and technical guidance referenced throughout and should be explicitly cross-referenced in ST2, GN1, ST8 and design codes.</p>
<p>Policy ST6 Colchester’s Employment Needs</p>	<p>The Minerals and Waste Planning Authority recommend additional wording for Policy ST6 to facilitate waste uses within employment areas.</p> <p>“Proposals for new employment uses within the existing and defined employment areas will be supported. Employment uses for the purposes of this policy are defined as Use Classes E(g), B2, and B8. Alternative economic class uses and ‘sui generis’ uses may contribute to the provision of jobs by providing flexibility and securing delivery of additional jobs. Suitable alternative economic and ‘sui generis’ uses will be supported within existing and defined areas where they are in accordance with all relevant policies in the plan, including impact assessments where these alternative uses are for town centre uses and the threshold applies.”</p>

Document Reference	COMMENTS / CHANGE REQUIRED
Policy ST7 Infrastructure Delivery & Impact Mitigation	<p>Policy ST7 is strongly supported and reflects a model policy that has been found sound and adopted in other Essex local plans. This policy is welcomed and should be relied upon to provide appropriate financial contributions. Listing financial contributions (not just education) in individual site policies is not recommended as this risks omissions and each planning application must be judged on its own merits.</p> <p>Note: some site policies include ‘Any site specific requirements from the IDP’ and a list of ‘likely to include’ which does not include early years and childcare. This inconsistency could be construed as excusing some sites from contributing.</p> <p>ECC welcome that the Infrastructure Audit and Delivery Plan (IADP) includes Green Infrastructure as part of its categories. To strengthen this approach, it is recommended that the IDP also consider including delivery of Local Nature Recovery Strategy (LNRS) and BNG priorities, both on-site and off-site, as part of its infrastructure planning. This will ensure that nature recovery objectives are embedded alongside GI provision.</p> <p>Additionally, it is suggested that the IADP and associated Section 106 agreements incorporate mechanisms for long-term stewardship funding, such as commuted sums or endowments, to secure the management and maintenance of GI and Biodiversity Net Gain (BNG) habitats for the required 30-year period.</p>
Policy ST8 Place Shaping Principles	<p>ECC supports the embedding of Green Infrastructure (GI) into placemaking, which could be cross-referenced and aligned with the Essex GI Standards and Building with Nature to strengthen quality assurance.</p> <p>ECC welcomes the overarching nature of Policy ST8 to provide a cohesive approach to place-making, but recommends the following points are also incorporated to effectively cover climate change matters:</p> <ul style="list-style-type: none"> ● Include a reference in the policy to “have regard to” the Essex Design Guide so that it is a material consideration in planning decisions. ECC highlights the Open Legal Advice Part B which includes advice to decision-takers on the weight that can be applied. ● Add climate mitigation measures into Policy ST8, Clause c) to ensure that measures to radically reduce greenhouse gas emissions (including both operational and embodied carbon) are considered at the beginning of the design process when the greatest opportunity exists for making a positive impact. (Linked to Policy NZ1). ● Add a clause to ensure efficient use of materials and resources (including energy), prioritisation of re-use of existing buildings, and reduction in construction waste by moving towards a more circular economy (linked to Policy NZ2).

Document Reference	COMMENTS / CHANGE REQUIRED
Policy ST9 TCBGC	<ul style="list-style-type: none"> • Include exploring opportunities for renewable energy generation, infrastructure and storage, and decentralised energy and heating systems (linked to policy NZ1 and NZ4). <p>ECC welcome that TCBGC is recognised as part of the spatial strategy and has its own policy in the Local Plan and refers to the DPD which was adopted by CCC in June 2025 – note the text of Policy ST9 needs to be updated to reflect this.</p> <p>ECC welcomes that policies SP8 and SP9 from the Section 1 Local Plan are saved, as this provides the starting point for the Garden Community Policies as set out in the adopted DPD, including the safeguards to not determine the application for the Garden Community before the planning and full funding is secured for the Link Road and the RTS route linking to the development.</p> <p>All new allocations should recognise the existence of the Garden Community as an allocated site and include it in their base case for Transport Assessment/Statement work. This is especially relevant for the Colchester Northeast allocation (PP9) which could link into Bromley Road. The required masterplan for the entire allocation must provide measures to mitigate its own impact and not do so in a way which restricts the TCBGC allocation from being delivered in full.</p> <p>TCBGC is expected to make contributions into transport infrastructure in other parts of the city (see TCBGC DPD IDFP). In several cases this is a full contribution from TCBGC to mitigate its impact, in some cases TCBGC it is only expected to make a proportional contribution – e.g. city centre, A12/A120 junc²⁹. Therefore, other sites in the Local Plan need to make contributions into wider measures as well as TCBGC. The policies in the plan need to be robust to secure these wider contributions.</p> <p>The sites around the Hythe Quay, King Edward Quay, Hawkins Road area will impact on Colne Causeway and the Greenstead Junction and should contribute to mitigation in this area.</p>

Document Reference	COMMENTS / CHANGE REQUIRED
<p>Policy EN2: Biodiversity Net Gain (BNG) and Environmental Net Gain</p>	<p>Given the scale and greenfield nature of strategic allocations being proposed in the Draft Local Plan, ECC evidence indicates that 15-20% BNG is viable and achievable. It is recommended introducing a higher BNG target for strategic sites, subject to viability testing, to deliver enhanced environmental outcomes and align with Essex-wide ambitions. The evidence can be provided following consultation.</p> <p>ECC welcome the policy’s emphasis on on-site delivery as the first priority, which aligns with national requirements and good practice. However, would the current wording restrict “high strategic significance” to the Council’s listed sites, limit the application of the statutory strategic significance multiplier (1.15) under the Biodiversity Metric and reduce opportunities for nature recovery at a county scale? Although it is noted that ideally compensation or off setting is to be as near to the development site as possible. An alternative is to amend the wording to recognise all Essex Local Nature Recovery Strategy (LNRS) strategic creation opportunity areas as eligible for “high strategic significance,” while retaining the Council’s listed sites as preferred options for off-site unit purchase. Suggested revised wording is provided below.</p> <p>BNG Delivery and Conditions</p> <p>To ensure effective implementation, we recommend making the following explicit in validation and planning conditions:</p> <ul style="list-style-type: none"> • Submission and approval of a Biodiversity Gain Plan • A 30-year Habitat Management and Monitoring Plan (HMMMP) • Early phasing of GI and habitat creation to allow establishment from the outset <p>These measures will secure long-term biodiversity benefits and compliance with statutory requirements.</p>
<p>Policy EN3: Biodiversity & Geodiversity</p>	<p>ECC support Policy EN3 emphasis on the mitigation hierarchy, robust ecological survey requirements, and the expectation for Landscape and Ecological Management Plans (LEMP) and Construction Environmental Management Plans (CEMP). To strengthen implementation and align with national BNG standards, it is recommended requiring the submission and approval of a Biodiversity Gain Plan and a 30-year Habitat Management and Monitoring Plan as part of the planning process as mentioned for Policy EN2. These should be conditioned to ensure delivery and long-term ecological outcomes. Additionally, it is suggested early phasing of Green Infrastructure features within development to secure habitat establishment and connectivity from the outset, supporting the Essex Local Nature Recovery Strategy objectives and reducing fragmentation risks.</p>
<p>Policy EN5: New and Existing Trees</p>	<p>ECC support the approach in Policy EN5 and GN4 to protect existing trees and increase canopy cover and recommend strengthening through clear establishment and maintenance standards. These should include watering, mulching, and weeding for the first three years (e.g., 60L per visit x 14 visits May–Sept annually) and removal of stakes/ties at year 3, consistent with best practice. It is agreed</p>

Document Reference	COMMENTS / CHANGE REQUIRED
Policy GN4: Tree Canopy Cover pp69-70	that species selection should follow the principle of <i>right tree, right place</i> , prioritising not only native species, but also climate resilience and diversity to reduce pest and disease risk. Trees should be embedded as integral elements of site design, with adequate rooting space and measures to avoid future conflicts with built form or highways, ensuring they function as focal points and contribute to sense of place. All proposals should include a landscape management plan with agreed maintenance periods, and any replacement planting should be located as close as possible to the development and supported by a robust management scheme. Linking these requirements to GN4 canopy targets will help secure long-term canopy uplift and climate adaptation benefits.
Policy EN8: Flood Risk & SuDS Para 4.32–4.39	<p>ECG support Policy EN8 alignment with LLFA guidance and its emphasis on integrating Sustainable Drainage Systems (SuDS) with Green Infrastructure to deliver multifunctional benefits. To strengthen implementation, reference needs to be made to the Essex SuDS Design Guide and the use of nature-based solutions that mimic natural drainage processes wherever possible. Design codes should require SuDS to provide amenity and biodiversity enhancements in addition to managing water quantity and quality, ensuring these features contribute to placemaking and ecological resilience. It is also recommended clarifying that SuDS should not be counted as part of the minimum open space requirement under Policy GN1 unless they demonstrably meet both standards for multifunctionality.</p> <p>Early consideration of natural flood management at a catchment scale, retention of existing drainage features, and opportunities to enhance river corridors should be embedded within masterplanning. Clear maintenance responsibilities for the lifetime of the development should also be secured to ensure long-term functionality and ecological value.</p>
Policy EN8 Critical Drainage Areas	<p>The LLFA support the document referring to Critical Drainage Areas, however, it should include that sustainable drainage systems should be designed not only to mitigate the risks of onsite flooding but to also mitigate the risk of downstream flooding. This point should be made as well as the following amendments.</p> <p>Point e) Include “<i>planters on down pipes</i>” .</p> <p>Point f) Include that SuDS should be included in the landscape strategy to enhance biodiversity and improve quality for residents and visitors to the site.</p> <p>Para 4.36 Include, “<i>surface water discharge from developments should be at the 1 in 1 Greenfield rate</i>” .</p> <p>Para 4.37 Include, “<i>Where Brownfield sites have previously discharged to the foul network they should look for an alternative option for discharge of surface water to alleviate the stress on the foul network.</i>”</p>

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>Para 4.39 Include, “Where any work is undertaken on a watercourse Section 23 consent should be sought.”</p>
Chapter 5 Para 5.4	<p>It is welcomed that the Essex GI Standards were reviewed to inform this chapter, as this demonstrates a commitment to best practice and ensures strong alignment with county-wide principles for delivering high-quality, multifunctional Green Infrastructure, green spaces that support biodiversity, local nature recovery, climate resilience, and community wellbeing.</p>
GN1: Open Space and Green Network & Waterways Principles	<p>ECC support the requirement for a minimum of 10% gross site area as multifunctional open space and welcome the inclusion of “play on the way” features, which help create active, engaging routes for all ages. To strengthen delivery, it is recommended including natural play elements within these spaces, using landscape features and materials that encourage imaginative, nature-connected play rather than relying solely on formal equipment.</p> <p>Additionally, it is also recommended using the Urban Greening Factor (UGF) assessment for urban and brownfield sites to ensure a measurable approach to greening and Natural England’s Environmental Benefits from Nature tool. Clarification should also be provided that SuDS counted towards open space must meet amenity and biodiversity performance criteria in line with ECC GI Standards, and that these features should not be double counted against minimum open space requirements unless they demonstrably achieve multifunctionality.</p>
Policy GN2: Strategic Green Spaces & Nature Recovery	<p>ECC support the integration of Policy GN2 with the ELNRS and the focus on the Roman River corridor as a priority nature recovery area. To strengthen delivery, it is recommended requiring that development proposals within LNRS strategic habitat creation opportunity areas demonstrate a net positive contribution to LNRS priorities. In addition, the policy could reference the statutory biodiversity net gain metric uplift, whereby BNG delivered in locations of high strategic significance attracts a 1.15 multiplier, incentivising habitat creation in priority areas.</p>
Policy GN3: Local Green Spaces	<p>ECC welcome the inclusion of Policy GN3 designating Local Green Spaces, as this provides strong protection for areas of particular community value and ensures their long-term role in supporting wellbeing, biodiversity, and local character, in line with Neighbourhood Plans.</p>
Policy GN6: Retention of Open Space	<p>ECC supports Policy GN6 commitment to retaining, protecting, and enhancing existing open spaces and addressing deficiencies. To maximise the benefits of any new or replacement provision, we recommend that all new open spaces are designed to be multipurpose, delivering not only recreation but also biodiversity, climate resilience, and sustainable drainage functions in line with Essex Green Infrastructure Standards. This approach ensures that open spaces contribute to the wider green network, provide amenity value, and</p>

Document Reference	COMMENTS / CHANGE REQUIRED
	support nature recovery while meeting community needs. Clear guidance on multifunctional design within the policy or technical appendix would help secure these outcomes consistently.
Policy LC1: Landscape	ECC welcomes the inclusion of Policy LC1 and its strong emphasis on safeguarding and enhancing landscape character. To strengthen delivery, it is recommended that the policy promotes a landscape-led approach, ensuring that development integrates landscape and Green Infrastructure features, where possible from the outset as a core design principle rather than an add-on. This approach will ensure that proposals not only respect existing landscape character but also create opportunities for habitat creation, connectivity, and sustainable drainage within the wider green network.
Chapter 7	ECC welcome the inclusion of Chapter 7, and specifically policies NZ1 and NZ2 which broadly reflect the Planning Policy Statements for Greater Essex (which set out recommended policies - Policy GE1: Operational Energy and Carbon (net zero) in homes and buildings , and Policy GE2: Embodied Carbon and Circular Economy in homes and buildings) published on the Essex Design Guide and which are underpinned by a technical evidence base collaboratively prepared on behalf of all the authorities in Greater Essex. ECC very much welcomes and supports the active participation of Colchester City Council policy officers in the Essex-wide collaborative Climate Planning Policy Support (CPPS) group which has help steer and guide the technical evidence and policy development.
Para 7.1	The rephrasing of this paragraph is advised to make clear that policies referred to were published by the Essex Planning Officers' Association (EPOA) rather than ECC directly. The recommended rephrasing of the first sentence is to read: "Essex County Council has developed recommended planning policy for Local Planning Authorities in Greater Essex <i>Planning policy and shared evidence for Greater Essex has been prepared by the Climate and Planning Unit at Essex County Council, in collaboration with officers from all the Local Planning Authorities (LPAs), and under the guidance of the Essex Planning Officers Association. The planning policies are recommended to LPAs</i> to embed in their Local Plans (and other associated planning documents) to ensure that all new homes and buildings achieve a consistent, clearly defined, net zero carbon (in operation) standard that aligns with local and national climate targets and delivers high quality, healthy, energy efficient, climate resilient homes and buildings; and tackle embodied carbon emissions from new build development."
Para 7.2	The rephrasing of the paragraph is advised to make clear that the policies referred to also cover embodied carbon and circular economy. Currently only operational carbon (net zero) is referred to. The recommended rephrasing is as follows:

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>“These two recommended policies are included in this chapter. The policies are supported by evidence produced for Essex and provides the basis for a consistent policy approach towards Net Zero Carbon in operation, reducing embodied carbon emissions and minimising construction waste by moving towards a more circular economy, for residential and non-residential development across Essex.”</p>
<p>Policy NZ1 Net Zero Carbon Development (in operation)</p>	<p>ECC very much welcomes and supports the inclusion of Policy NZ1. This builds upon the consistent approach being implemented across Greater Essex where similar policies have been / are being embedded into Local Plans.</p> <p>ECC strongly recommend Policy NZ1 (including the Minimum Standards Approach Specifications Table on 84) is amended to accurately reflect the updated Greater Essex-wide Policy GE1 published in the Operational Energy and Carbon (Net Zero) Planning Policy Statement (October 2025) on the Essex Design Guide. The key elements of the policy are consistent, but some aspects have been amended to improve clarity, introduce some flexibility (requirement 3 - energy use intensity limits), and simplify requirement 4 (renewable energy). This has been done in response to scrutiny and new evidence commissioned for the Uttlesford District Council Local Plan examination (where a similar policy was examined in June 2025). The supporting evidence, including offset price, has been refreshed and the evidence reports re-issued in September 2025. Please refer to the Energy and Carbon policy and evidence on the Essex Design Guide: https://www.essexdesignguide.co.uk/climate-change/essex-energy-carbon-evidence/</p> <p>The ECC Climate and Planning Unity are happy to support CCC with updating the policy wording and supporting text or advise / assist with any queries following this consultation.</p>
<p>Para 7.8</p>	<p>Please replace link in Paragraph 7.8 with this updated one: https://www.essexdesignguide.co.uk/climate-change/essex-energy-carbon-evidence/</p>
<p>Para 7.10</p>	<p>Please update link in Paragraph 7.10 with this one: https://www.essexdesignguide.co.uk/climate-change/essex-building-net-zero-specification-guidance/</p> <p>Also, please update the 2nd sentence of paragraph 7.10 as suggested below:</p> <p>“Specification Guidance outlining technical information on how to build homes that meet the Net Zero Policy requirements has been produced. A new main document and a supporting document suggesting how Essex Net Zero specifications might be produced</p>

Document Reference	COMMENTS / CHANGE REQUIRED
Policy NZ2 – Net Zero Carbon Development (in operation) Para 7.14	<p>are now available. These have been produced to assist with the delivery of achieving healthy, efficient, climate resilient, net zero homes according to the Essex Net Zero Policy Position and can be found within the Essex Design Guide, here.”</p> <p>EC very much welcomes and supports the inclusion of Policy NZ2 which broadly reflects the Policy GE2 published in the Embodied Carbon and Circular Economy Planning Policy Statement for Greater Essex (October 2025) on the Essex Design Guide, and which is underpinned by the technical evidence base (Essex Embodied Carbon Policy Study – re-issued Sept 2025) collaboratively prepared by all authorities in Greater Essex. However, in order to maintain consistency across Greater Essex, it is recommended that the policy wording is amended to more accurately reflect the wording set out in Policy GE2 in the Planning Policy Statement referred to above.</p> <p>Please update the date and the link to the Essex Embodied Carbon Policy Study which was re-issued in September 2025 in response to scrutiny at the Uttlesford District Council Local Plan examination (hearings held June 2025). The re-issued version includes updated to improve clarity in the presentation of the cost implications of the Study.</p> <p>The webpage link is: https://www.essexdesignguide.co.uk/climate-change/essex-embodied-carbon-policy-study/ And direct link to the updated report: Essex Embodied Carbon Policy Study - Technical Evidence Base (Levitt Bernstein, Etude, Introba, Hawkins/Brown, Currie & Brown, June 2024, Re-issued September 2025).</p>
Policy NZ3 Wastewater & Water Supply Justification	<p>It is suggested that some, or all, of the following evidence be reviewed and included within the ‘Justification’ section for higher standards for water efficiency, to supplement the Colchester evidence. The water efficiency targets outlined in Policy NZ3 exceed current Part G Building Regulations, so detailing the extensive evidence from government bodies, ECC and industry stakeholders which recommends stricter efficiency requirements will be valuable to establish why such an approach is necessary for Colchester.</p> <p>Among the emerging evidence which encourages more stringent standards than those in Part G is the Water Ready report, published in 2024 by the Future Homes Hub. This report recommends that water stressed areas adopt 90 l/p/d by 2030 and 80 l/p/d in water stressed areas by 2035. Essex is a water stressed area.</p> <p>The Shared Standards in Water Efficiency for Local Plans was published in June 2025 as part of a joint initiative developed by Natural England, the Environment Agency, and water companies endorsed by Water Resources East to support Local Planning Authorities (LPAs) to deliver sustainable growth. The water company partners are Anglian Water, Cambridge Water, Essex and Suffolk Water and Affinity Water. The Shared Standards provide advice and evidence to LPAs on how they can secure higher water efficiency standards for new homes and commercial developments.</p>

Document Reference	COMMENTS / CHANGE REQUIRED
Policy NZ3 Wastewater & Water Supply	<p>The Shared Standards document is a regional piece of work which encompasses Essex and its level of water stress in its evidence-based recommendations. It sets out model policy for local plans to adopt, which provides targets for both residential and non-residential buildings. These include a target 85 l/p/d for new residential development. For new non-residential buildings, full credits within the 4 categories for the BREEAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development.</p> <p>The Water Strategy for Essex (2024) is also valuable piece of evidence which highlights the need for a stringent policy approach to address water scarcity in Essex. It brings together literacy, shares data and challenges from a range of partners on natural flood management and water conservation, and water scarcity and quality issues for the next 30 years at the county level, and focuses on 30 recommendations linked to reducing demand water; changing land use for water; and future water supply options.</p> <p><i>Note: The scope of comments by the ECC Climate and Planning Unit are restricted to water efficiency in buildings only.</i></p> <p>ECC welcomes the water efficiency requirement for residential development of 80 litres per person per day. Essex is a water stressed area, with only three fifths of water consumed being sourced from within the county. Without immediate intervention, this water scarcity will only increase as the climate crisis progresses. Current Part G building regulations for water efficiency in buildings are insufficient to mitigate the problem at the scale necessary to meet future needs. It is therefore commended that these targets, based on sector evidence, which exceed building regulations have been adopted.</p> <p>There are currently no requirements for water efficiency for non-residential buildings listed under Policy NZ3. It is encouraged that the Shared Standards in Water Efficiency for Local Plans (2025) (7) approach for non-residential buildings be adopted to ensure that water efficiency policies encompass the widest range of building types in Colchester:</p> <ul style="list-style-type: none"> • New, extended or redeveloped non-household ('non-household' means all development except residential dwellings.) buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development.

Document Reference	COMMENTS / CHANGE REQUIRED
Policy NZ4 Renewable Energy	<p>ECC recommends that reference to greywater recycling for domestic properties be omitted, as there is currently extensive legislation which restricts the use of communal grey water reuse systems managed by water companies. While this doesn't prohibit the use of single property systems managed by a homeowner, these are still considered to be generally cost prohibitive. Commercial development such as hotels should still consider grey water reuse where this is considered viable.</p> <p>The challenges for residential developments to utilise greywater and rainwater reuse are as follows: section 4 of the Water Supply (Water Quality) Regulations 2016 requires water supplied by companies, such as the Shared Standards in Water Efficiency for Local Plans (2025) partners, to be “wholesome” if supplied for “domestic purposes”¹. The Water Industry Act 1991² includes WC flushing under “sanitary” and then subsequently “domestic” purposes. This is usually interpreted as meaning that water recycling cannot be supplied by water companies for domestic purposes.</p> <p>The current Building Regulations do not have an explicit legal requirement to consider water reuse. There is some guidance relevant to reuse in certain sections, but some of the references are to other documents (e.g. WRAS Guidance) which are now out of date. The situation may improve with the Building Regulations update proposed in the Plan for Water: our integrated plan for delivering clean and plentiful water, a policy paper published by DEFRA in 2023, but the timetable for this is not specified.</p> <p>Statutory Water Companies (and NAVs) cannot legally supply reclaimed water for domestic purposes (because of the wholesomeness requirement) whereas others can – provided human health is not jeopardised and notification is provided and approved. It is assumed that supply for non-domestic purposes is permissible.</p> <p>Cumulatively, the above evidence illustrates that there is not enough information supporting the adoption of greywater recycling until government legislation and guidance changes.</p> <p>ECC welcomes the inclusion of Policy NZ4 which provides a positive policy approach towards renewable energy development. ECC supports the clause relating to Community-led Energy schemes, recognising that the positive benefits such schemes can bring should be considered as a material consideration in decision-making on planning applications.</p>

¹ [Enabling Water Reuse in the UK: Single Source of Truth \(March 2025\)](#) - 9

² [Enabling Water Reuse in the UK: Single Source of Truth \(March 2025\)](#) - 9

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>An additional clause is recommended to ensure that all schemes benefit host communities. For example, the following could be included:</p> <p><u>“applicants must demonstrate any benefits of the proposal to host communities and how this will be secured and distributed”</u></p> <p>It would also be helpful if the supporting text provided some definition of what a community-led energy project is. The following text is recommended:</p> <p><u>“Community energy projects involve groups of people coming together to purchase, manage, generate, or reduce consumption of energy. This includes (but is not limited to), solar panels, wind farms, hydro power, rural heat networks, battery storage, electric vehicle charging points, car clubs and fuel poverty alleviation schemes. Programmes are usually not-for-profit, and profits raised from projects are reinvested back into the communities which they power.</u></p> <p><u>The government is establishing GB Energy that will work alongside communities and local authorities to develop renewable energy projects to generate up to 8 GW of energy. The government recognises the role of community groups play in efforts to reduce their contribution to climate change and offers a range of support to community energy projects such as funding to enable both rural and urban communities to access grant funding to develop local renewable energy projects.”</u></p> <p>Also, to provide context, the ECC Energy and Low Carbon Team is working proactively with communities across Essex to help deliver community energy schemes. These projects align with the recommendations of the Essex Climate Action Commission Report ‘Net-Zero: Making Essex Carbon Neutral’ July 2021, and helps deliver the targets and actions set out in the ECC Essex Climate Action Plan (2021).</p>
Chapter 9 Economy	<p>Economy chapter – alignment to Essex LTP4 & Implementation Plans</p> <p>It is recommended that this chapter include cross-references to Essex LTP4: “A Better Connected Essex” and the Colchester Implementation Plan, treating transport investment (i.e. RTS, bus priority, active travel, highway improvements and demand management) as a core economic enabler.</p> <p>Workplace mobility and freight decarbonisation - Require Workplace Travel Plans and Freight/Service Decarbonisation Plans at strategic employment allocations and for large employers (mode-share targets, zero-emission last-mile, consolidation/micro-hubs, EV fleet charging), aligned to LTP4 and the ECC Climate Action Plan.</p>

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>Evidence coherence</p> <p>Anchor the economy chapter to the 2025 Colchester Further Transport Evidence and Transport Topic Paper, clarifying that growth delivery depends on the vision-led mode-shift package which enables efficient movement of goods and people.</p>
<p>Policy E1: Protection of Employment</p>	<p>ECC welcomes that Policy E1: Protection of Employment safeguards all land and premises currently in employment use primarily for class E(g), B2 and B8 Use Classes. However, it is recommended that Policy E1 include best practice guidance on providing evidence to justify and support the release of employment uses. For example, guidance could be provided to ensure that applicants:</p> <ul style="list-style-type: none"> ● Recognise the stage of the economic and property market cycle, recognising the potential upsides and downsides this poses in the short, medium and longer term ● Consider how planned economic development initiatives, infrastructure and regeneration projects may affect demand ● Recognise that historic take-up rates are often limited by inadequate supply in terms of quality, quantum and affordability, therefore alternative indicators of demand such as known occupier requirements, enquiries received, and waiting lists for multi-let space should be considered ● Consider vacancy and availability of space in tandem, recognising that lease terms and affordability can limit suitability of available space for occupiers ● Consider the development pipeline locally, recognising that planning permissions do not always turn into delivered floorspace ● Outline marketing activity to date, recognising that interest will be stronger as the scheme becomes more developed, time moves nearer to completion of the floorspace/post-completion, and the location becomes more established ● Set out feedback from market engagement, and the options considered to improve deliverability (e.g. revising specification of spaces / mix of uses, early delivery of a critical mass of floorspace, design to mitigate impacts on neighbours) ● Make clear what support has been sought from the public sector to address identified market failures
<p>Policy E4: Retail and Centres</p> <p>Policy CC1 City Centre</p>	<p>It is recommended that the term ‘larger scale development’ is defined in the context of this policy.</p> <p>It is recommended that Policy E4, paragraph 1 on p17 is strengthened to include reference to upper floor residential areas and clarify the term ‘throughout the day’ as this will naturally exclude night time retail uses.</p>

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>There is an opportunity for Policy E4 to incorporate urban greening principles, as retail and town centres play a key role in creating attractive, climate-resilient, and healthy environments. Urban greening can enhance the public realm, improve biodiversity, mitigate heat island effects, and support active travel—all of which align with sustainable development goals.</p> <p>ECC support Policy E4 focus on maintaining vibrant retail and town centres and recommend that it also promotes urban greening measures as part of public realm improvements and redevelopment proposals. Incorporating features such as street trees, rain gardens, green roofs, and planters will enhance the attractiveness and functionality of centres, improve climate resilience, and contribute to biodiversity and air quality benefits.</p>
<p>Policy E5: Colchester Zoo</p>	<p>Paragraph 2 of 123 states ‘Any proposals will also take into account the Essex Minerals Local Plan and the developer will be required to submit a Minerals Resource Assessment as part of any planning application.’ The MWPA require this to be amended to read: ‘Any proposals will also take into account <i>must comply with</i> the Essex Minerals Local Plan and the developer will be required to submit a Minerals Resource Assessment as part of any planning application’.</p> <p>The policy should also include provisions which strengthen sustainable accessibility to the zoo from the Colchester urban area through improving existing public rights of way (footpaths, bridleways, etc), to encourage increased cycling and walking, to link up with wider proposed Colchester LCWIP network.</p>
<p>10. Community and social infrastructure</p>	<p>It is recommended that the following is included in Policies CS2, CS3, CS4 or otherwise included in another policy (perhaps transport orientated) to ensure the issue is covered.</p> <p><i>“All new or enhanced community facilities (education, health, leisure) must demonstrate safe, inclusive access by walking, cycling and public transport, with links to the Local Cycling & Walking Infrastructure Plan (LCWIP), mobility hubs and RTS corridors, consistent with Essex LTP4.”</i></p> <p>All new or enhanced community facilities, including education, health, leisure and cultural buildings, should also look to incorporate electric vehicle (EV) charging infrastructure in accordance with the latest Essex County Council and national standards. Provision should include:</p> <ul style="list-style-type: none"> • Active EV charging points for staff and visitors; • Passive provision (ducting and capacity) for future expansion;

Document Reference	COMMENTS / CHANGE REQUIRED
	<ul style="list-style-type: none"> Charging for electric bicycles and micro-mobility where appropriate.
Policy CS3 Education Provision	<p>This could be included within these relevant policies or included/linked in another policy to ensure the issue is covered.</p> <p>Para 4 refers to the NPPF in the context of a presumption in favour of the development of schools and educational uses. It is suggested that this is expanded to reference the location and guidance in the NPPF December 2024, paragraph 100.</p>
Policy CS4	<p>The policy refers to “all outdoor sports facilities”. How does this relate to Policy CS3? Should this policy exclude state schools?</p>
Para 10.10	<p>Out of date reference: The latest 10-Year Plan is 2025-34 and a new plan will be published early 2026. The updated document can inform and be stated in the Pre-Submission Plan..</p>
Policy PC1: Healthier Food Environments	<p>ECC supports Policy PC1 and its emphasis on promoting healthier food environments through allotments, orchards, and community gardens. These spaces not only provide access to fresh, locally produced food but also deliver wider Green Infrastructure benefits, including biodiversity enhancement, climate resilience, and opportunities for physical activity and social interaction. The policy could also encourage edible tails.</p> <p>ECC welcome and support the inclusion of the Healthier Food Environments policy in line with the NPPF para 97 looking to manage hot food takeaway in the City.</p>
Policy PC2 Active and Sustainable Travel	<p>Suggested addition for Policy PC2 introduction: <u>“Development proposals should align with proposed Essex LTP4 (‘A Better Connected Essex’) and the Colchester Implementation Plan, prioritising active and sustainable travel and demand management measures to reduce car dependency.”</u></p> <p>Justification paragraph 11.13 – Ensure reference is made to ECC latest LCWIP Plan for Colchester (currently September 2024), for cycling and walking route network.</p> <p>Omission. There is limited reference to Mobility Hubs in the Draft Local Plan’s policies and therefore it is recommended inserting additional policy text referencing Essex Design Guide/Mobility Hubs Implementation Guide (September 2024) to support integrated travel and developer contributions.</p>

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>Point k. This point is welcomed but in relation to new education and childcare facilities traffic free zones are required to school frontages rather than just “School Streets”. Reference should be made to the Essex Design Guide School Design Guidance. All housing development should improve or provide direct safe walking and cycling routes to appropriate local education and childcare provision. This should be clearly stated. The policy is recommended to read as follows.</p> <p>k. Include school frontages streets and zones around new education and childcare facilities having regard to the Essex Design Guide School Design Guidance; and</p> <p><u><i>l. All housing development should improve or provide direct safe walking and cycling routes to appropriate local education and childcare provision.</i></u></p>
Policy PC3: Parking Standards	<p>Recommended additional wording for Policy PC3: <u>“EV charging provision should be informed by ECC’s [2023/24] charge-point strategy evidence base to ensure ‘Right Charger in the Right Place’, prioritising locations identified by ORCS/LEVI funding assessments.”</u></p> <p>It is also recommended that the policy encourages soft landscaping within parking areas to deliver multifunctional benefits. Integrating features such as street trees, planted verges, rain gardens, and permeable surfaces will help manage surface water, reduce heat island effects, and enhance visual quality, while contributing to biodiversity and the wider green network.</p>
Policy PC6: Design and Amenity	<p>Policy PC6 mentions sustainable design but does not explicitly require SuDS, shade, and heat adaptation in public realm. It is recommended the following worded is included: <u>“Public realm and street design should incorporate climate adaptation measures (SuDS, heat-resilient materials) to support climate action plan objectives.”</u></p> <p>ECC welcomes the requirement for high standards of sustainability within the design and construction of buildings. This should be expanded to include the need for construction materials to be sustainably sourced, to ensure the maximum possible recycling of aggregates from construction, demolition and excavation wastes produced at development or redevelopment sites. This will align with the minerals and waste plans.</p> <p>Omission. Digital connectivity for placemaking. There is no explicit requirement for full-fibre/5G-ready infrastructure in new developments. It is recommended that policy PC6 is amended and included the following: <u>“All major developments should integrate full-fibre and 5G-ready infrastructure to support digital inclusion and smart mobility.”</u></p>

Document Reference	COMMENTS / CHANGE REQUIRED
<p>Policy PC7: Residential Schemes on Greenfield Sites</p>	<p>It is recommended that Policy PC7 is strengthened support of sustainable modes and the following text can be included under design/layout principles:</p> <p><u>“Residential schemes on greenfield sites must:</u></p> <ul style="list-style-type: none"> ● <u>Provide a connected network of safe, attractive walking and cycling routes linking homes to schools, local centres, and public transport, consistent with LCWIP and Essex Design Guide;</u> ● <u>Integrate with RTS corridors and mobility hubs where applicable, ensuring direct access to high-quality public transport;</u> ● <u>Include EV charging infrastructure for all dwellings and visitor spaces, plus micro-mobility facilities (e-bike/cargo bike storage and charging);</u> ● <u>Deliver a site-wide Travel Plan with mode-share targets, monitoring, and measures to promote car clubs and shared mobility; Design streets and public realm to prioritise active and sustainable modes over private car use.”</u>
<p>Place and Connectivity General</p>	<p>It is recommended that all sites included in the Local Plan are assessed using the DfT connectivity tool. The tool has been available to authorities in developing Local Plans and is now available to the development industry and the public. The consultation draft NPPF (Dec 2025) promotes the use of the DfT Connectivity Tool to assess locations for sustainable development. The tool is set up to provide a consistent assessment of areas based on connectivity by active and sustainable transport to a range of existing services/amenities. This assessment will provide an indication of how well the selected sites currently perform in terms of connectivity, help evidence the need to invest in active and sustainable travel, increase the level of services/amenities to be provided on site to meet the Well Connected objective/themes of:</p> <ul style="list-style-type: none"> ● Better public transport corridors to reduce congestion and increase active travel making cycling and walking more attractive. ● Create communities which reduce the need to travel, particularly by car for most of their daily needs. <p>The tool will also show variations across a site to help advise on internal provision across a site.</p> <p>Local interpretation is required as though the tool is sophisticated and gives a level of consistency, it does need local interpretation as it cannot assess issues such as topography, the scale/complexity of an existing feature to be crossed or followed.</p>
<p>12. Place Policies General comment: Transportation</p>	<p>Essex County Council (ECC), as the statutory Highways and Transportation Authority, has undertaken a proportionate transport assessment for the Regulation 18 stage of the Colchester Local Plan. This assessment forms part of the evidence base supporting the Preferred Options and ensures compliance with the NPPF and Duty to Cooperate requirements.</p> <p>Development proposals should align with proposed Essex LTP4 ('A Better Connected Essex') and the Colchester Implementation Plan, prioritising active and sustainable travel and demand management measures to reduce car dependency.”</p>

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>Further refinement of mitigation packages and costings will occur through the Infrastructure Audit and Delivery Plan (IADP) and Regulation 19 stage. At Regulation 19, ECC expects:</p> <ul style="list-style-type: none"> • Updated transport evidence reflecting fixed allocations and committed infrastructure • Detailed junction-level modelling and safety audits • Confirmation that residual cumulative impacts are not severe (NPPF para. 116) • Demonstration of deliverability and integration with the IDP <p>ECC supports the principle of Place Policies and the requirement for master planning but recommends strengthening Chapter 12 to ensure transport impacts are managed effectively and sustainably.</p> <ul style="list-style-type: none"> • Place Policies should clearly state that site delivery is contingent upon implementing appropriate transportation measures, and that all mitigation must be consistent with the transport evidence base to ensure impacts are managed effectively • Applying mode share targets • Delivery and connection with LCWIP links and active travel infrastructure • Contributions to sustainable travel measures, LCWIP, BSIP, passenger transport, RTS, bus priority, mobility hubs, P&R and highway mitigation measures • Robust Travel Plans with monitoring and remedial measures • Require Freight and Servicing Strategies for Urban Sites • Monitoring and Enforcement Framework - Mode share and junction performance KPIs and remedial pathways for underperformance <p>ECC will continue to work with CCC, NH, and neighbouring LPAs to refine and secure deliverable transport solutions at Regulation 19, ensuring compliance with NPPF and alignment with LTP4 objectives.</p>
<p>12. Place Policies</p> <p>General comment: Education</p>	<p>It is noted that most of the relevant Place Policies include reference to site specific new education provision (broadly reflecting the NEA provided to CCC 11/8/25 and based on CCC housing data) but there are omissions. The local plan must also specifically allocate land for education and EYCC use to set land values (including education land that forms part of extant planning permissions - failure to do this risks the loss of the options secured, in the event new planning permissions are sought by the developer); and the land must meet the criteria set out in the ECC Developers' Guide to Infrastructure Contributions and facilitate delivery compliant with the Essex Design Guide School Design Guidance (2.18ha site for primary school and EYCC). CCC will need to address these three issues as part of the Pre-Submission Plan.</p>

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>While relevant Place Policies include reference to site specific new education provision from the IADP (broadly reflecting the NEA, although there are omissions), the local plan must specifically allocate land for education and EYCC use to set land values (including education land that forms part of extant planning permissions - failure to do this risks the loss of the options secured, in the event new planning permissions are sought by the developer); the land must also meet the criteria set out in the ECC Developers' Guide to Infrastructure Contributions and facilitate delivery compliant with the Essex Design Guide School Design Guidance (2.18ha site for primary school and EYCC).</p> <p>The ENA identified the need for at least one new secondary school to serve Colchester, in addition to new facilities that serve TCBGC. The secondary school requirement has not been included in the Draft Plan and will need to be allocated in the Pre-Submission Plan. ECC acknowledges the requirement is stated in the IADP (Stage 3) for site allocation PP18 Land North of A120 Marks Tey; and in the Infrastructure Topic Paper prepared by CCC, where Appendix A lists the infrastructure requirements for the preferred options site allocations (including those for education). It is understood this was done as the Draft Plan was not amended following its deferral for consultation by CCC in 2025. Instead the evidence base (in this case the IADP) reflects the updated education requirements for this Regulation 18 stage, and these requirements (and any updates) will then be included in the Pre-Submission Plan. ECC will maintain ongoing engagement with CCC on this issue to ensure necessary education infrastructure is allocated in the Local Plan.</p>
<p>12. Place Policies</p> <p>General comment:</p> <p>Green Infrastructure</p>	<p>ECC welcome that a significant number of Place-Based Policies reference or relate to Green Infrastructure, demonstrating a strong commitment to delivering multifunctional, climate-resilient spaces. Several policies (e.g., PP19, PP21, PP31, PP32, PP34, PP42, PP43) include requirements for onsite BNG measures, SuDS prioritisation, tree belts and hedgerows for landscape integration, and connectivity to green networks and active travel routes.</p>
<p>Policy CC1</p> <p>City Centre</p>	<p>The City Centre falls within CDA NCOL_003 Abbey Gate, NCOL_005 St Annes and NCOL_007 Mie End. Developers should refer to the Colchester Surface Water Management Plan. Where brownfield sites discharge surface water to the foul network they should explore alternative discharge locations in order to alleviate the pressures on the network. Sites within CDAs should explore what opportunities are available for rainwater harvesting. Discharge of surface water should be at the 1in1 Greenfield rate for all events up to the 1 in 100 event plus climate change. The drainage strategy should adhere to the standards in the Sustainable Drainage Systems Guide for Essex.</p> <p>ECC is supportive of the policy to encourage well-designed residential development in the city centre, as a means of creating a diverse mix of uses that support the vitality and viability of the centre, where residents are easily able to access local services and businesses.</p>

Document Reference	COMMENTS / CHANGE REQUIRED
Policy PP1 Britannia Car Park	Britannia Car Park falls within CDA NCOL_003 Abbey Gate, developers should refer to the Colchester Surface Water Management Plan. Where the discharge of surface water is to the foul network they should explore alternative discharge locations in order to alleviate the pressures on the network. Sites within CDAs should explore what opportunities are available for rainwater harvesting. Discharge of surface water should be at the 1 in 1 Greenfield rate for all events up to the 1 in 100 event plus climate change. The drainage strategy should adhere to the standards in the Sustainable Drainage Systems Guide for Essex.
Policy PP2 Vineyard Gate	Vineyard Gate is in CDA NCOL_003 Abbey Gate, developers should refer to the Colchester Surface Water Management Plan. Where the discharge of surface water is to the foul network they should explore alternative discharge locations in order to alleviate the pressures on the network. Sites within CDAs should explore what opportunities are available for rainwater harvesting. Discharge of surface water should be at the 1 in 1 Greenfield rate for all events up to the 1 in 100 event plus climate change. The drainage strategy should adhere to the standards in the Sustainable Drainage Systems Guide for Essex.
Policy PP3 St Runwalds Street Car Park	St Runwalds is in CDA NCOL_003 Abbey Gate, developers should refer to the Colchester Surface Water Management Plan. Where the discharge of surface water is to the foul network they should explore alternative discharge locations in order to alleviate the pressures on the network. Sites within CDAs should explore what opportunities are available for rainwater harvesting. Discharge of surface water should be at the 1 in 1 Greenfield rate for all events up to the 1 in 100 event plus climate change. The drainage strategy should adhere to the standards in the Sustainable Drainage Systems Guide for Essex.
Policy PP4 Braiswick	Parts of Braiswick are in CDA NCOL_007 Mile End, developers should refer to the Colchester Surface Water Management Plan. Where the discharge of surface water is to the foul network they should explore alternative discharge locations in order to alleviate the pressures on the network. Sites within CDAs should explore what opportunities are available for rainwater harvesting. Discharge of surface water should be at the 1 in 1 Greenfield rate for all events up to the 1 in 100 event plus climate change. The drainage strategy should adhere to the standards in the Sustainable Drainage Systems Guide for Essex. The LLFA support the advice to move away from discharge to the combined sewer.
Policy PP5 Land at Chesterwell	Chesterwell is not within a CDA and it is in Flood Zone 1. Development here should adhere to the Sustainable Drainage Systems Guide for Essex and discharge at the 1 in 1 greenfield rate, developers should follow the drainage hierarchy and look for alternatives to the foul and combined network.
Policy PP6	Land at Colchester North Station, development here should adhere to the Sustainable Drainage Systems Guide for Essex and discharge at the 1 in 1 greenfield rate, developers should follow the drainage hierarchy and look for alternatives to the foul and combined network.

Document Reference	COMMENTS / CHANGE REQUIRED
Land at Colchester North Station	
Policy PP7 Land of Bakers Lane	Land of Bakers Lane, development here should adhere to the Sustainable Drainage Systems Guide for Essex and discharge at the 1 in 1 greenfield rate, developers should follow the drainage hierarchy and look for alternatives to the foul and combined network.
Policy PP8 Land at Lakelands Crescent	Land at Lakeland Crescent development here should adhere to the Sustainable Drainage Systems Guide for Essex and discharge at the 1 in 1 greenfield rate, developers should follow the drainage hierarchy.
Policy PEP3 Land South of Tollgate West	Planning permission already granted.
Policy PEP4 Maldon Road	Maldon Road development here should adhere to the Sustainable Drainage Systems Guide for Essex and discharge at the 1 in 1 greenfield rate, developers should follow the drainage hierarchy.
Policy PP9 North East of Colchester	North East Colchester development here should adhere to the Sustainable Drainage Systems Guide for Essex and discharge at the 1 in 1 greenfield rate, developers should follow the drainage hierarchy.
Policy PP10 Land South of Berechurch Hall Road	Land South of Berechurch Hall Road development here should adhere to the Sustainable Drainage Systems Guide for Essex and discharge at the 1in1 greenfield rate, developers should follow the drainage hierarchy.
Policy PP11 Europit Site	Brownfield sites should ensure surface water is not discharged into the foul network and should follow the drainage hierarchy and endeavour to discharge surface water at the greenfield 1in1 rate, developers should adhere to the standards in the Sustainable Drainage Systems Guide for Essex.
Policy PP9: Northeast Colchester	Paragraph n) needs to be reworded to explicitly reference the need for a Mineral Resource Assessment and to comply with the Minerals Local Plan.

Document Reference	COMMENTS / CHANGE REQUIRED
Point n	<p><u>“Development proposals over 5ha within a Mineral Safeguarding Area will require a Mineral Resource Assessment (MRA). Please Liaise with ECC as the Minerals and Waste Planning Authority for further information with regards to the scope of the MRA.”</u></p> <p>Note that this updated wording will apply to place policies for all sites that require an MRA (PP9, PP10, PP17, PP18, PP28, PP29, PP32, PP37).</p>
Policy PP9 North East Colchester Point r	<p>2.18ha of suitable land is required for a potential primary school and EYCC facility. The Plan must specifically allocate land for Education and Childcare use to set land values. The land must meet the criteria set out in the ECC Developers’ Guide to Infrastructure Contributions and facilitate delivery compliant with the Essex Design Guide School Design Guidance.</p>
Policy PP12 Land at Robertson Van Hire Site	<p>Land at Roberston Van Hire is within a CDA NCOL_03 Abbey Gate, surface water discharge should be at the greenfield 1 in 1 rate and should not be to a foul or combined network. Rainwater harvesting should be considered.</p>
Policy PP13 146 Magdalen Street	<p>Magdalen Street is within a CDA NCOL_03 Abbey Gate, surface water discharge should be at the greenfield 1in1 rate and should not be to a foul or combined network. Rainwater harvesting should be considered.</p>
Policy PP14 Gas Works and Hythe Scrap Yard	<p>Gas works and Hythe Scrap Yard is within CDAs 013 and 02 surface water should be discharged at the 1in1 greenfield rate and the site should not discharge surface water into the foul or combined sewers. Consideration should be given to rainwater harvesting.</p>
Policy PP15 Hawkins Road	<p>Site is not within a CDA and is in Flood Zone 1. Developers should adhere to the standards in the Sustainable Systems Design Guide for Essex.</p>
Policy PP16 Coal Yard Site	<p>Coal Yard Site, development should avoid the flood zones and adhere to the standards in the Sustainable Systems Guide for Essex the area falls within CDA NCOL_08 Parsons Heath, discharge of surface water should be at the 1 in 1 greenfield rate. Discharge of surface water should not be to the foul or combined network. Consideration should be given to rainwater harvesting.</p>
Hythe Opportunity Areas	<p>ECC welcomes the commentary on the opportunities provided by Hythe Opportunity Areas and their potential to deliver mixed-use neighbourhoods, and recognition of the flooding constraints. It is recommended that a comprehensive masterplan is prepared for the Hythe Opportunity Areas given the complex opportunities and constraints and to protect Colchester City Centre from undue</p>

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>competition and that this should inform the release of land from employment use. The Draft Plan should recognise the role these opportunity areas play in providing employment opportunities for residents, including those in deprived communities in Greenstead, and the severance caused by the railway, River Colne and major roads, as well as the restrictions across the level crossing on Hythe Station Road.</p> <p>The policy needs to be reworded as the site is within a Waste Consultation Area and to comply with the Waste Local Plan.</p>
<p>Place Policies Policy OA1: King Edward Quay</p>	<p><u>The site is within a Waste Consultation Area (WCA). Applications made within WCAs are required to include a Waste Infrastructure Impact Assessment (WIIA) as part of its evidence base. Please liaise with ECC as the Minerals and Waste Planning authority for further information with regards to the scope and content of WIIA.</u></p> <p>Note that this additional wording will apply to place policies OA1 and PP29.</p>
<p>Policy OA1 King Edward Quay</p>	<p>King Edward Quay development should avoid the flood zones and adhere to the standards in the Sustainable Systems Guide for Essex the area falls within CDA NCOL_01 Old Heath and O2 The Hythe, discharge of surface water should be at the 1 in 1 greenfield rate. Discharge of surface water should not be to the foul or combined network. Consideration should be given to rainwater harvesting.</p>
<p>Policy OA2 Land East of Hawkins Road</p>	<p>Land East of Hawkins Road development should avoid the flood zones and adhere to the standards in the Sustainable Systems Guide for Essex the area falls within CDA 08 Parsons Heath, discharge of surface water should be at the 1 in 1 greenfield rate. Discharge of surface water should not be to the foul or combined network. Consideration should be given to rainwater harvesting.</p>
<p>Policy OA3 Magdalen Street Opportunity Area</p>	<p>ECC welcomes the inclusion of Magdalen Street as an opportunity area and recognition that this site is a key but underdeveloped gateway to the city centre. The commentary on the Transforming the City centre project and major public investment into adjacent public realm and highways projects (e.g. St Botolph's junction) is also welcome. Additional reference could be made to the heritage, landscaping and public realm enhancements planned for St Botolph's Priory and Britannia car park (with improved pedestrian access to Colchester Town Station), given that these sites are directly opposite Magdalen Street and present an opportunity to create high quality and accessible public realm on both the north and southern sides of the station</p> <p>Reference should also be made to the opportunity area having due regard to the principles and ambitions of the City Centre masterplan (even though it falls just outside the boundary).</p>

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>The LLFA notes that Magdalen Street is within CDA NCOL_003 Abbey Gate developments should adhere to the Sustainable Drainage System Guide for Essex and discharge surface water at the 1 in 1 greenfield rate. Rainwater harvesting should be considered.</p>
Policy PEP2 Knowledge Gateway	<p>Knowledge Gateway this area is not within a CDA and has some local ponding of surface water where development should be avoided.</p>
Policy UE1 University of Essex	<p>University of Essex is not within a CDA but has some areas of surface water ponding these areas should be avoided or managed in a way that does not increase of site flooding.</p>
Marks Tey PP17, PP18, PEP5, PEP6	<p>The text at paragraph 12:19 suggests that this could be an Opportunity Area but is shown as a full allocation on the Policies Map – clarity needs to be provided here.</p> <p>PP17 and PP18 both require masterplans for the “entire” area – clarity needs to be provided if that is for the Marks Tey Growth Area as a whole or the individual allocations. There is a significant difference on infrastructure requirements and the delivery of the measures if separate or combined. The A12, A120 strategic roads and the Great Eastern Main Line offer significant barriers and severance to active and sustainable movement. Far greater clarity is needed on the planning strategy for this area.</p>
	<p>ECC supports the opportunities offered by large-scale, Garden Village-type development that prioritises sustainable travel, environmental enhancements and employment creation.</p> <p>Marks Tey has a recent history of being considered as a location for such strategic residential and employment growth. Even though the context has changed, much of the evidence gathered at that time can inform how future development is considered. Critical to this consideration is an acknowledgement of the significant severance of the existing community by two trunk A-roads (and their complex junction arrangements) and the Great Eastern Mainline and Gainsborough Branch Line junction. The draft Local Plan rightly highlights this as a defining issue of the area.</p> <p>Despite the draft Local Plan highlighting the fragmented nature of Marks Tey, ECC consider Policies and PP17 and PP18 need to be significantly strengthened to provide a suitable framework for enabling sustainable development and addressing severance around Marks Tey. We raise these issues in a spirit of collaboration given the opportunity to deliver sustainable new housing at scale and address the identified local issues proactively.</p>

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>Our first concern is that the two policies, while very similar in their content and requirements, do not interrelate to each other. Given that the policies, in combination with the spatial designations in the Policies Map, allocate both parcels of land for c.2,500 homes a different approach could ensure that the developments (and new communities) complement and cohere to each other. Perhaps just as importantly it could also improve connectivity and coherence within the existing settlement of Marks Tey and its relationship with neighbouring areas such as Copford (and Copford Green). Collectively, these settlements have various retail and community facilities and improving alignment and connectivity between them would benefit those areas and their assets. We fully support the requirement for masterplans ahead of planning applications and this approach has been a constructive exercise at other strategic developments across the county.</p> <p>The requirements of PP17 and PP18 both set out the need for a masterplan of the two ('entire') sites. However, we believe that this masterplan requirement should instead be for the whole Mark Tey Growth Area, incorporating the four policy area allocations as well as the existing communities and facilities into one comprehensive masterplan. This approach would also enable the locally-prepared Neighbourhood Plan policies to be incorporated into the strategic growth of the area. A wider masterplan could be produced for the whole area and subsequent masterplans could be prepared for each development parcel that are in adherence to the wider masterplan.</p> <p>Without a single masterplan approach there is a considerable risk that severance and fragmentation will be exacerbated. For example, it is likely that given the scale of growth proposed around the wider area a secondary school will be required in this part of the county and these sites may offer a location for it. Without appropriate safe and direct linkages across the whole growth area the opportunity to maximise public transport connections and active travel links will be lost or extremely difficult to deliver. The same can be said for health and community facilities which ideally should complement each other so as to capture the opportunity to scale up facilities whilst avoiding the risk of any necessary duplication. A single masterplan also offers an opportunity to reduce infrastructure costs and make more effective use of land value capture; it could also provide an opportunity for infrastructure equalisation between promoters/developers. The employment areas (PEP5 and PEP6), whilst primarily facing onto the Strategic Road Network, would also benefit from masterplanning in order to connect them with the wider development. Furthermore, the proposed housing growth would not be physically well-related to the railway station which is particularly pertinent given the proposed changes to the NPPF. Are there opportunities for land near the station to be included within the Local Plan? Or land further to the west with good transport connections?</p> <p>Secondly, the shape and location of the spatial allocations across the two growth sites suggests that they follow land ownership boundaries rather than being based on comprehensive and coherent design. This is particularly evident in the southern parcel where two significant areas of 'grey land' cut into the main development area. It is also evident on the northern parcel where the allocation appears to unnecessarily push northwards, creating a significant distance from the northern most point of the allocation to the existing community of Marks Tey and amplifying severance caused by the Roman River Valley. Allocating the sites based on a sense of design coherence would ensure that the eventual masterplanning of the area is carried out on the best possible foundation.</p>

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>Thirdly, the northern site policy alludes to the potential growth of the wider area as a Garden Village, (PP18 is described as a Garden Village but PP17 is not), however, it is not clear how the policy relates to this wider growth and how the planning of the initial 1,000 homes relates to the wider growth potential, or even what the total capacity for the site will be. This is of particular concern given the importance of the first phase of the Garden Village setting the foundations for wider growth. In practice, this should not only mean avoiding development decisions that could prejudice proposals for long-term comprehensive development in the area, but also maximising the opportunity to design the 1,000 homes as part of a larger settlement delivered beyond the Local Plan period. The Reg 18 Plan provides a definition for a Garden Community in the glossary but not for a Garden Village – for the sake of clarity this should be addressed. The plan also states at Para 12.19 that the area is an ‘Opportunity Area; but this not reflected in the policies or the Policies Map.</p> <p>Lastly, we are concerned about the dependence on strategic infrastructure improvements on the A12 and A120. This dependence is rightly highlighted in the supporting text, but the policies themselves make no reference as to how these improvements will be accommodated, and how they will relate and impact the wider growth area. Perhaps more importantly, the policies do not mandate any improvements as a condition of largescale development in the area. We accept that the recent cancellation of the A12 Widening scheme has caused unfortunate uncertainty to strategic highways upgrades in the area, however there is now an opportunity for ECC and CCC to take a proactive approach as to how future improvements should be safeguarded and delivered so as to provide solutions to the historic severance issues already mentioned. We would welcome further discussions with CCC about how to go about this as part of the Local Plan’s preparation.</p> <p>PEP5 – this employment site was part of the previous Garden Community proposal originally contained in the Section 1 Reg 19 Local Plan and would have been served off a de-trunked A12 with the opportunity to create a quality active and sustainable travel corridor. With the cancellation of the A12 Widening Scheme this would not be possible, and the site would require extensive junction design to make it work safely from a road user perspective, and for it to be accessed safely for sustainable and active travel; access and egress would require lengthy journeys just to change direction.</p> <p>PEP5 – this employment site was part of the original Section 1 Regulation 19 Local Plan and would have been served off the detrunked A12 with the opportunity to create a quality active and sustainable travel corridor along what would have been the ‘old’ A12. With the cancellation of the A12 widening scheme this would not be possible and the site would require extensive junction work to make it work</p>

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>safely. Egress and Access may require lengthy journeys just to turn. It should also be noted that the PEP5 site is severed from the local community and the two new strategic residential allocations PP17 and PP18.</p> <p>To improve connectivity for PP17 and PP18, significant investment will be needed in both transport infrastructure and services and to reduce the need to travel to provide a wide range of facilities/amenities on site.</p> <p>The policy needs to be reworded as the site being within a Mineral Consultation Area and to comply with the Minerals Local Plan.</p> <p><u>“The site is within a Mineral Consultation Area (MCA). Non-mineral led applications made within MCAs are required to include a Minerals Infrastructure Impact Assessment (MIIA) as part of its evidence base. Please liaise with ECC as the Minerals and Waste Planning authority for further information with regards to the scope and content of MIIA.”</u></p>
Policy PP17 Land South of A12	<p>Note that this additional wording will apply to place policies PP17 and PP18.</p> <p>2.18ha of suitable land is required for a potential primary school and EYCC facility. The Plan must specifically allocate land for Education and Childcare use to set land values. The land must meet the criteria set out in the ECC Developers’ Guide to Infrastructure Contributions and facilitate delivery compliant with the Essex Design Guide School Design Guidance.</p>
Policy PP18: North of A120, Marks Tey Growth Area	<p>Note is made of this allocation expanding to become a Garden Village, beyond the Plan period. No on-site education or childcare provision has been identified for the first 1,000 homes, which are allocated in this Plan period. Although it is acknowledged that such requirements are included in the updated evidence (the IADP) and the Infrastructure Topic Paper, with the intention to include requirements and allocate land in the Pre-Submission Plan. Ongoing engagement with ECC is required to ensure this takes place.</p> <p>Allocating land for an all-through school on this site in the emerging Plan, in anticipation of longer-term growth, could address wider un-met secondary school need.</p>
Policy PP19 Land North of Oak Road Tiptree	<p>Land North of Oak Road Tiptree not within a CDA, development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.</p>

Document Reference	COMMENTS / CHANGE REQUIRED
Policy PP20 Land at Bonnie Blue Oak Blue Oak Tiptree	Land at Bonnie Blue Oak not within a CDA, development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.
Policy PP21 Highlands Kelvedon Road	Highland Kelvedon Road not within a CDA, development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.
Policy PP22 Telephone Exchange	Telephone Exchange not within a CDA, development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.
Policy PEP7 Highlands Nursery	Highlands Nursery, development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 Greenfield rate
Policy PEP8 Land South of Factory Hill	Land South of Factory Hill development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate
Policy PP23 Land East Dawes Lane	Land East of Dawes Lane development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate
Policy PP24 Land Northwest of Fire Station	Land North West of Fire Station development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.
Policy PP25 View Park	View Park development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 Greenfield rate
Policy PP26	North of Boxted Straight Road development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 Greenfield rate.

Document Reference	COMMENTS / CHANGE REQUIRED
Land North of Boxted Straight Road	
Policy PP27 Swan Grove	Swan Grove development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.
Policy PP28 Land West of Station Road	Land West of Station Road development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.
Policy PP29 Land East of School Road Copford	Land East of School Road Copford development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate. There appear to be some natural ponds on the site and any strategy should mimic natural flows.
Policy PP30 Land South of Long Road	Land South of Long Road development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.
Policy PP31 Land North of Halstead Road East of Wood Lane	Land North of Halstead Road East of Wood Lane development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.
Policy PP32 Land North of Halstead Road	Land North of Halstead Road development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.
Policy PEP 9 Bullbanks	Bullbanks development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.
Policy PP33	Land East of Plummers development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.

Document Reference	COMMENTS / CHANGE REQUIRED
Land East of Plummers Fordham	
Policy PP34 Land North of Coach Road	Land North of Coach Road, the site has some flows or ponding of surface water a drainage strategy should evidence how these flows will be managed, they should not increase the risk of off-site flooding. The development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.
Policy PP35 The Old School Great Horkesley	The Old School The development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.
Policy PP36 Land at Earls Colne	Land at Earls Colne The development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate.
Policy PP37 Land North of Park Lane	Land North of Park Lane The development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate. Where there are pockets of surface water the drainage strategy should evidence how these will be dealt with.
Policy PP38 Land Opposite Wick Road	Land opposite Wick Road The development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate. Where there are pockets of surface water the drainage strategy should evidence how these will be dealt with.
Policy PEP 10 Lodge Lane	Lodge Lane The development should follow the standards in the Sustainable Drainage Systems Guide for Essex, following the drainage hierarchy and discharging at the 1 in 1 greenfield rate. Where there are pockets of surface water the drainage strategy should evidence how these will be dealt with.
Policy PP37 North of Park Lane Langham	The Draft Plan proposes an allocation of 900 homes. The village school, Langham Primary, has insufficient site area to facilitate significant expansion. The smallest new school supported by ECC is two forms of entry, requiring 2.18ha of suitable land. However, the establishment of a new school would create excess capacity which may be to the detriment of other local schools. At this stage, significant concerns are raised on education terms and if the site is to be progressed as part of the Pre-Submission Plan then a clear plan to provide sufficient primary school places and a fully funded solution needs to be found. CCC will need to work with ECC following this consultation to discuss and work through possible options.

Document Reference	COMMENTS / CHANGE REQUIRED
Policy PP39 Land at The Furze	Land at The Furze this will potentially be a minor application in flood zone.
Policy PP40 Land West of The Folley	Land West of the Folley developer should adhere to the standards set out in the Sustainable Drainage Guide for Essex, discharge at the 1 in 1 greenfield rate and follow the drainage hierarchy.
Policy PP41 Rowhedge Business Park	Rowhedge Business Park the area is mainly in Flood Zone 1 with some ponding of surface water, the drainage strategy should evidence how this surface will be managed.
Policy PP42 Land at White Hart Lane	Land at White Hart Lane in Flood Zone 1 developer should adhere to the standards set out in the Sustainable Drainage Guide for Essex, discharge at the 1in1 greenfield rate and follow the drainage hierarchy.
Policy PP43 Land North of Colchester Rd	Land North of Colchester Road, developer should adhere to the standards set out in the Sustainable Drainage Guide for Essex, discharge at the 1 in 1 greenfield rate and follow the drainage hierarchy.
Policy PP44 Land off Colchester Road	Land off Colchester Road, developer should adhere to the standards set out in the Sustainable Drainage Guide for Essex, discharge at the 1 in 1 greenfield rate and follow the drainage hierarchy.
Policy PEP11 Land at Pattens Yard West Bergholt	Land at Pattens Yard, there are some areas of surface water ponding at the south of the site, if these are within the development area the drainage strategy should evidence how this surface water will be managed.
PP45 Land off Mew Road Aldham	Land off New Road Aldham, developer should adhere to the standards set out in the Sustainable Drainage Guide for Essex, discharge at the 1in1 greenfield rate and follow the drainage hierarchy.
Policy PP46	Land at Birch Green, developer should adhere to the standards set out in the Sustainable Drainage Guide for Essex, discharge at the 1 in 1 greenfield rate and follow the drainage hierarchy.

Document Reference	COMMENTS / CHANGE REQUIRED
Land at Birch Green	
Policy PP47 Land at Picketts Farm	Land at Picketts Farm, this will potentially be a minor application.
Policy PP48 Kelvedon Road Messing	Kelvedon Road Messing, developer should adhere to the standards set out in the Sustainable Drainage Guide for Essex, discharge at the 1 in 1 greenfield rate and follow the drainage hierarchy.
Policy PP49 Land at St Ives Road Peldon	Land at St Ives Road Peldon, developer should adhere to the standards set out in the Sustainable Drainage Guide for Essex, discharge at the 1 in 1 greenfield rate and follow the drainage hierarchy. Where there may be areas of surface water ponding the drainage strategy should evidence how these will be managed.
13 Monitoring	<p>For “11 Manage and Reduce Flood Risk” include “Will promote the use of SuDS” and encourage developers to look for ways to re-use rainwater where possible.”</p> <p>ECC notes the monitoring measures have been proposed in the Sustainability Appraisal (SA) report in relation to all of the SA objectives in the SA framework as a starting point for considering proposals to monitor the Plan. ECC recommend to ensure the policies ST1 Health and Wellbeing and Policy PC1 Healthier Food Environments are effective and defensible, the following indicators should be added to the Local Plan Monitoring Framework</p> <p>Strategic Policy ST1:</p> <ul style="list-style-type: none"> • % of applications submitting a Health Impact Assessment • % of application considered of good quality HIA <p>Policy PC1:</p> <ul style="list-style-type: none"> • No of new Hot Food Takeaways granted within 400m of a school/youth facility • % of appeals dismissed where Policy PC1 was a primary reason for refusal <p>This comment covers Item 4. Reduce the need to travel and promote sustainable and active transport options to reduce congestion.</p>

Document Reference	COMMENTS / CHANGE REQUIRED
	<p>All developments should undertake a level of monitoring of movements and at a basic level use “vivacity” multi modal sensors to monitor movement. Census does provide a quality data but is not timely enough to be able to react.</p> <p>For major/strategic sites the Travel Plan must include a comprehensive monitoring and reporting programme using a variety of techniques and the establishment of Transport Review Group. If the larger strategic developments wish to enter into a monitor and manage approach the Transport Assessment (TA) and Legal Agreement must include a “backstop” of measures that will need to be implemented if trigger points, targets, mode shares are not being met and impacts are greater than expected when compared to the TA. Future permission for later phases maybe not be given/delayed if transport targets are not being met.</p> <p>The above points may be better incorporated into a relevant policy in the Place and Connectivity chapter.</p>
Omission	<p>Transport Decarbonisation</p> <p>LTP4 and ECC’s Climate Action Plan use the “Avoid–Shift–Improve” framework to cut emissions from transport. Chapter 7 currently focuses on buildings and energy but does not link development design to reducing transport emissions. It is suggested that the following wording is included in the Local Plan in an appropriate section.</p> <p><u>“Development proposals must demonstrate how design and layout contribute to net zero objectives by reducing transport emissions. This includes integrating active travel and public transport infrastructure, providing EV charging facilities, and supporting shared mobility solutions. Streets and public realm should adopt multi-functional design to combine sustainable drainage with walking and cycling routes. Travel plans must set measurable mode share targets and report on carbon savings from transport interventions.”</u></p> <p>The Local Plan will also need to reference ECC’s Place & Movement hierarchy and LTP4 strategic principles. LTP4 will be delivered through Local Implementation Plans. The Local Plan does not yet show how these will be embedded in site-specific requirements or delivery mechanisms. This risks inconsistency with Essex-wide design standards and sustainable transport objectives. It is expected to become a mandatory design principle once LTP4 is adopted in February 2026. ECC will assist CC to address this issue as part of the Pre-Submission Plan.</p>

Comments on other documents

Document Reference	COMMENTS
<p>Colchester Local Plan - Evidence base – listed on webpage Evidence base and supporting documents Colchester City Council (omissions)</p>	<p>The Essex-wide evidence that underpins Policies NZ1 and NZ2 has been prepared collaboratively between all 15 Greater Essex authorities, led by the Climate and Planning Unit at Essex County Council, in response to the work of the Essex Climate Action Commission. The shared evidence is published on the Essex Planning Officers Association’s (EPOA) website - the Essex Design Guide - here Essex Energy & Carbon Evidence Essex Design Guide .</p> <p>It is recommended that, as a minimum, the following documents are specifically included in the Colchester Local Plan evidence base so that it is clear for the Inspector and public to understand the technical and legal justification of the relevant policies in the plan:</p> <p>Technical Feasibility & Costs evidence NZ1: Report 1: Essex Net Zero Policy – Technical Evidence Base (Introba, Etude and Currie & Brown, July 2023, updated September 2025) Report 2: Essex Net Zero Policy – Summary of Policy, Evidence and Validation Requirements (Introba, Etude and Currie & Brown, July 2023, updated September 2025) Update Report - Essex Energy Offsetting Tariff (Introba, Currie & Brown September 2025)</p> <p>Legal evidence: Addendum to Essex Open Legal Advice (October 2025) (Estelle Dehon KC, Cornerstone Barristers, 20th October 2025) Essex Open Legal Advice A (Updated May 2025) – Energy policy in plans and Building Regulations (Estelle Dehon KC, Cornerstone Barristers, 6th May 2025)</p> <p>Technical Feasibility & Costs evidence NZ2: Essex Embodied Carbon Policy Study - Technical Evidence Base (Levitt Bernstein, Etude, Introba, Hawkins/Brown, Currie & Brown, June 2024, Re-issued September 2025).</p> <p>It is also advised that a Topic Paper covering the policies NZ1 and NZ2 is prepared to assist the Inspector. The CaPU would be happy to advise on this at the appropriate stage.</p>

Document Reference	COMMENTS
<p>Colchester Local Plan - Evidence base – listed on webpage</p> <p>Evidence base and supporting documents</p> <p>Colchester City Council</p> <p>(omissions)</p>	<p>It is suggested that the following evidence be considered for inclusion to support the adoption of the water efficiency policies in Policy NZ3: Wastewater and Water Supply:</p> <p>Water Ready report (Future Homes Hub, 2024)</p> <p>Shared Standards in Water Efficiency for Local Plans (Natural England, the Environment Agency, Anglian Water, Cambridge Water, Essex and Suffolk Water and Affinity Water; 2025)</p> <p>Water Strategy for Essex (Essex County Council, 2024)</p>
<p>Sustainability Appraisal (SA)</p>	<p>The SA at this stage is considered robust and thorough. Its identification of notional Spatial Strategy options and the consideration of sites within those previously appraised is suitable and the findings adequately evidence base for the Regulation 18 Preferred options stage.</p> <p>ECC welcomes the inclusion of transport considerations within the Sustainability Appraisal, with the recommendations to enhance connectivity through improving sustainable links welcomed. It is noted that the current framework does not fully reflect Essex’s emerging transport priorities under LTP4. The draft Essex Local Transport Plan (LTP4) – <i>A Better Connected Essex</i> – is scheduled for adoption in early 2026 and will need to be reflected in the Regulation 19 stage, particularly policies on sustainable transport, dynamic traffic management, mode share targets & monitoring, and integration of land use and transport planning.</p>
<p>IADP</p> <p>TCBGC</p>	<p>The IADP only includes three schemes identified in the TCBGC IDPPF. There was a range of mitigation that TCBGC needs to fund/deliver – these have not been included. There are measures within the TCBGC IDPPF that are required within the LP plan period. The primary purpose of the A1331 Link Road is to unlock the development at TCBGC and this has been included in the LP IADP. The Local Plan evidence base demonstrates the need for the Link Road to support growth. Accepting that there could be duplication, or use of different names the plans need to be consistent.</p>

Document Reference	COMMENTS
Policies Map	It is recommended that the Policies Map clearly labels all site allocations, including Highlands Nursery, Tiptree (PEP7, 1.1 ha), which is currently not clear (only PEP8 4.7 ha is shown). It would also be useful if boundaries and site areas were shown beside the individual Place Policies.