

Our Ref: 50961

Planning Policy Department  
Colchester City Council  
Rowan House  
33 Sheepen Road  
Colchester  
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CO3 3WG

14<sup>th</sup> January 2026

Dear Colchester City Council,

**Preferred Options Local Plan: Regulation 18 Consultation 2025**

We appreciate the opportunity to provide feedback on the emerging Local Plan and recognise the Council's ambition to create a sustainable, inclusive, and well-designed future for Colchester. While the vision is clear and positive, our review of the draft policies has identified several areas where refinement is necessary to ensure the plan is justified, effective, and deliverable as it progresses toward Regulation 19.

A recurring concern is the duplication and layering of requirements across multiple policies. Mandatory Health Impact Assessments under ST1 largely replicate matters already addressed in Planning Statements and Design and Access Statements; GN4 and EN5 create overlapping tests for tree canopy and tree planting; and the requirement for standalone Green Network and Waterways Plans duplicates landscape and SuDS work. This cumulative approach risks a paperwork-heavy regime that adds cost and delay without clear additional benefit, contrary to national policy on proportionality and focused evidence.

Across the plan, there is a need for greater nuance and contextual flexibility. Policies such as PC7 adopt a prescriptive, one-size-fits-all approach that does not account for site-specific constraints or local character. For example, the requirement for centrally located open space may conflict with coalescence and landscape objectives on certain allocations. A more

context-led approach would deliver better outcomes and avoid unnecessary friction between policies.

We are also concerned about the deliverability of certain policies and the extent to which they represent vulnerable groups within the district. Policy H7 relies heavily on strategic allocations for Gypsy and Traveller provision without securing specific, deliverable sites in the early years of the plan or identifying contingency measures should these allocations slip. This approach risks failing national requirements for a five-year supply and could lead to continued unmet need across the city as with the 2017-2033 Plan. In addition, the Plan does not adequately address the needs of neurodiverse individuals. Policies relating to specialist housing and design, including H5, H6, PC6 and PC7, omit any reference to neuroinclusive principles, missing an opportunity to embed cognitive and sensory accessibility into new development. These omissions are particularly significant given that these groups often have limited socioeconomic capital to engage with consultations, making proactive policy inclusion essential.

In addition, we must urge that the Local Plan actively supports rural workers and their businesses. This means supporting growth and diversity across both allocated and non-allocated rural employment sites, enabling investment in modern, fit-for-purpose buildings, and providing a clear, workable route to secure essential rural workers' dwellings where there is a proven functional need. Policies E2 and H8 should give unambiguous definitions, evidence requirements and timeframes, so genuine rural workers, across agriculture, land-based and related rural industries, can live near their work and sustain viable rural businesses, rather than being held back by ambiguity and unnecessary policy hurdles.

Environmental policies, while well-intentioned, also require careful calibration to avoid unintended consequences. The blanket requirement for a minimum 10% tree canopy cover and tree-lined streets under GN4 is unrealistic on constrained sites and conflicts with highways, heritage, and density objectives. Similarly, the rigid wording on Biodiversity Net Gain, which demands that all opportunities be taken to maximise on-site provision and restricts the strategic significance of offsite measures to a narrow list of Council-preferred sites, risks distorting the emerging BNG market and undermining scheme viability. These policies need flexibility to balance environmental objectives with housing delivery and design quality.

We welcome the Council's intention to adopt a more balanced spatial strategy, but the allocations currently proposed in some areas, such as Peldon and West Bergholt, do not fully

reflect this ambition. Restricting growth to selected villages risks undermining the vitality of smaller communities and their ability to sustain local services. A proportionate level of growth across all villages would better support demographic change and economic resilience, aligning with the principles of sustainable development. It is also important that settlement boundaries genuinely reflect how settlements are experienced and understood on the ground, and that future growth patterns respect the historic form and evolution of each village rather than imposing arbitrary or overly rigid edges.

Finally, the omission of the B1025 as a key transport corridor represents a missed opportunity to support growth in South Colchester. This route plays a vital role in connecting Mersea Island and southern communities to the city centre and underpins access to employment, tourism, and leisure opportunities. Recognising its strategic importance would enable proportionate rural growth and help address the current imbalance in sports and recreation provision, which is concentrated in the north of the city.

Our recommendations are realistic, proportionate, and consistent with national policy. They aim to reduce duplication, embed inclusivity, ensure environmental objectives are balanced with viability, and deliver a spatial strategy that supports all communities while recognising strategic infrastructure. We urge the Council to incorporate these changes before Regulation 19 to ensure the Local Plan is sound, effective, and capable of delivering its vision.

Yours sincerely,

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For and on behalf of Stanfords

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| Stanfords Representations            |                                                                  |                         |
|--------------------------------------|------------------------------------------------------------------|-------------------------|
| Call for Sites/Preferred Allocations |                                                                  |                         |
| Call for Sites Reference             | Site Address                                                     | Regulation 18 Reference |
| 10179                                | Land northwest of Kemps Farm, Mersea Road, Peldon                | 13090                   |
| 10181                                | Land west of Malting Road, Peldon                                | 13089                   |
| 10615                                | Land off Colchester Road, West Bergholt                          | 13444                   |
| 10233                                | Land at Oxley House, Abberton                                    | 13280                   |
| 10183                                | School Road, Messing                                             | 13285                   |
| Draft Policies                       |                                                                  |                         |
| Section                              | Draft Policy                                                     | Regulation 18 Reference |
| 3                                    | ST1: Health and Wellbeing                                        | 13454                   |
| 3                                    | ST2: Environment and the Green Network and Waterways             | 13461                   |
| 3                                    | ST3: Spatial Strategy                                            | 13451                   |
| 3                                    | ST4: Development in the Countryside                              | 13452                   |
| 4                                    | EN2: Biodiversity Net Gain (BNG) and Environmental Net Gain      | 13465                   |
| 4                                    | EN5: New and Existing Trees                                      | 13456                   |
| 4                                    | EN6: Conserving and Enhancing the Historic Environment           | 13543                   |
| 4                                    | EN8: Flood Risk and Sustainable Drainage Systems (SuDS)          | 13480                   |
| 5                                    | GN1: Open Space and Green Network and Waterways Principles       | 13482                   |
| 5                                    | GN4: Tree Canopy Cover                                           | 13473                   |
| 8                                    | H2: Affordable Housing                                           | 13445                   |
| 8                                    | H5: Specialist Housing including Housing for an Aging Population | 13446                   |
| 8                                    | H6: Self and Custom Build                                        | 13483                   |
| 8                                    | H7: Gypsies, Travellers and Travelling Showpeople                | 13447                   |
| 8                                    | H8: Rural Workers Dwellings                                      | 13448                   |
| 9                                    | E1: Protection of Employment                                     | 13449                   |
| 9                                    | E2: Economic Development in Rural Areas and the Countryside      | 13450                   |
| 10                                   | CS4: Sports Provision                                            | 13453                   |
| 10                                   | PC6: Design and Amenity                                          | 13476                   |
| 11                                   | PC7: Residential Schemes on Greenfield Sites                     | 13478                   |
| 11                                   | PC8: Private Amenity Space                                       | 13479                   |